



ANTI-SEXUAL HARASSMENT POLICY (POSH POLICY)

VISION TIME INDIA LIMITED

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CIN: U74300TN2002PLC049150

Registered Office: 'SRINIVASA APARTMENTS', No. 6, Prakasam Street, T. Nagar, Chennai – 600017, Tamil Nadu

1.0. Objective

Vision Time India Limited (“Vision Time”) has a zero-tolerance policy for any act of sexual harassment of any kind, including retaliation, suppression or distortion of complaints or evidence. This policy is framed to create and maintain a safe work environment, free from sexual harassment and discrimination for all its employees.

This policy is established in accordance with the Sexual Harassment of Women at Workplace (Prevention, Prohibition & Redressal) Act, 2013 in the professional environment. While the Act specifically protects women, this policy extends protection to all employees irrespective of gender.

Through this policy, Vision Time is committed to taking all necessary steps to ensure that employees and all associated persons work in a safe and respectful environment conducive to professional growth and equality of opportunity.

2.0. Scope and Applicability

This policy is applicable to all employees in the organization, irrespective of gender, including part-time employees, contract staff, trainees, interns, and service providers deployed on the premises. The policy covers acts occurring within the premises of the organization or any place connected with employment, including virtual/digital platforms under the organization’s control.

3.0. Redressal:

3.1. Policy Statement

The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (the “Act”) states that no employee shall be subjected to sexual harassment at any workplace.

3.2. Internal Complaints Committee (ICC)

An Internal Complaints Committee (ICC) shall be constituted in accordance with the Act.

3.2.1. Task Force/Committee Members

- a. Presiding Officer – 1 Member (Senior Woman Employee – mandatory)
- b. Internal Members – At least 2 Members committed to women’s causes or having legal knowledge.

At least 50% of the members shall be women.

3.3. POSH Policy Guidelines:

Sexual Harassment shall include but not be limited to: -

- Physical contact and sexual advances
- Demand or request for sexual favours
- Sexually coloured remarks
- Showing pornography or any other indecent content, including digital media
- Any other unwelcome physical, verbal, non-verbal, or written conduct of a sexual nature
- Any of the following circumstances that occur or is present in relation to or connected with any act or behavior of Sexual Harassment (under (i) to (v) herein above):
 - i. implied or explicit promise of preferential treatment in the employee's employment;
 - ii. or implied or explicit threat of detrimental treatment in the employee's employment;
 - iii. or implied or explicit threat about the employee's present or future employment status;
 - iv. or interference with the employee's work or creating an intimidating or offensive;
 - v. or hostile work environment for the employee; or humiliating treatment likely to affect the employee's health or safety.

3.4. Responsibilities & Procedure:

3.4.1 Complaint Mechanism:

Any aggrieved employee may file a complaint in writing with the ICC within a period of three months from the date of the incident.

Where the complainant is unable to make a written complaint, the ICC shall provide necessary assistance.

Complaints may be submitted via email compliance@visiontime.in (Email ID).

The complainant may request conciliation before initiation of inquiry, provided that no monetary settlement is involved.

An amicable resolution is possible only with the written consent of the complainant.

If the respondent is a direct supervisor or influences the complainant's career, reporting structure may be modified during inquiry.

3.4.2. Appeal:

Any person aggrieved by the ICC report may prefer an appeal before the appropriate legal forum within ninety days.

3.5. Responsibilities of the ICC

The ICC shall ensure a fair and unbiased inquiry, providing reasonable opportunity to both parties.

The ICC shall complete the inquiry within ninety days.

The ICC shall initiate appropriate remedial measures to respond to any substantiated allegations of Sexual Harassment, such as;

- i. Informing the said complaint to the respondent;
- ii. Informing the respondent to not reach out to the complainant directly or indirectly until the investigation completes;
- iii. Instructing to cease the alleged act of sexual harassment immediately;
- iv. Gathering immediate explanation from the respondent for the same.

During the pendency of inquiry, interim relief such as transfer or leave up to three months may be recommended.

3.5.1. ICC Inquiry Process

The ICC will examine complaints in accordance with the Act and principles of natural justice.

3.5.2. Sanctions

The ICC may recommend actions based on gravity of the offence, including:

- Written apology
- Warning, reprimand, or censure
- Termination from service
- Withholding promotion or increments
- Salary deduction for compensation
- Counseling or community service
- Initiation of legal action

Annual report summarizing complaints and Redressal of Sexual harassment shall be prepared by designated person. The said Report as well as all documents regarding Sexual harassment complaints shall be in the custody of designated person and will be termed as **“Strictly Confidential”** and shall be strictly confidential.

3.5.3. Malicious or False Complaints:

Where the ICC arrives at a conclusion that the complaint was false and made with a malicious intent, the ICC shall take strict disciplinary action against the complainant, which action may be similar to the action taken for committing an act of Sexual Harassment. The ICC shall also take strict disciplinary action on any witness who submits false evidence or produces any forged or misleading document relating to the complaint. Mere inability to substantiate a complaint shall not attract action.

4.0. Definitions

4.1. What Constitutes as a Workplace

A Workplace includes any Vision Time office or premises, or any place visited by the Employee arising out of or during the course of employment, such as (including but not limited to): (i) transportation provided by or through Vision Time for undertaking a journey arising out of or during the course of employment, or (ii) meetings, conferences, seminars, training sessions, workshops, etc. organized by or through Vision Time.

4.2. Who is an Employee Under the Act?

An Employee means a person employed at a Workplace for any work on regular, temporary, ad hoc or daily wage basis, either directly or through an agent, including a contractor, with or, without the knowledge of the principal employer, whether for remuneration or not, or working on a voluntary basis or otherwise, whether the terms of employment are express or implied and includes a co-worker, a contract worker, probationer, trainee, apprentice or called by any other such name.

5.0. Miscellaneous:

Reference any other policies, documents or legislation that support the interpretation of this policy. Vision Time has the maximum discretion permitted by law to interpret, administer, change, modify or delete this policy at any time, with or without notice. This policy does not form part of any employee's contract of employment unless explicitly stated otherwise in such contract of employment, and this policy has not been adopted to encourage any person to commence or continue employment

with the Company. This policy is not intended to restrict communications or actions protected or required by local, state or federal law or a collective bargaining agreement.

5.1. Special Circumstance and Exception:

Any Deviation from this policy has to be approved by Human Resource (HR). Any changes to the policy have to be approved by Legal and Compliance.

5.2. Non-compliance and Consequence:

Any person (including the witness) known to the incident or who has any knowledge about the contents of the complaint shall ensure **strict confidentiality**. No such information shall be published or communicated in any manner whatsoever, including (but not limited to), publication in Vision Time Intranet portal or any internal messaging service, through email or any other social media or media. Vision Time shall take strict disciplinary action against any person who is found to have breached their duty of confidentiality, including imposition of a penalty as prescribed under the Act.

6.0. Monitoring and Review:

This policy and Procedure will be reviewed whenever required from the date of implementation. Reviews will be initiated by the HR Department. Where changes in employment legislation occur that directly affect this policy, these will be reflected with immediate effect and communicated through HR.
