


POSH Policy
Version1.6

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2 Property Information

This document is the property information of Shiprocket Limited (hereinafter referred as “Shiprocket & group companies”). The content of this document is confidential and intended only for the valid recipients. This document is not to be distributed, disclosed, published, or copied further.

3 Document Control

3.1 Information

Title	Classification	Version	Status
POSH Policy	Confidential	1.6	Approved

3.2 Revision History

Author(s)	Date	Version	Summary of Changes
HR Team	09Dec2021	1.0	First version of the policy.
HR Team	04Apr2024	1.1	Changes in scope of the policy.
HR Team	04Apr2024	1.2	Legal entity name change.
HR Team	04Dec2024	1.3	IClist update
HR Team	22 Jan 2025	1.4	IClist update
HR Team	10 Mar 2025	1.5	IClist update
HR Team	19 Mar 2025	1.6	Legal entity name change

3.3 Review and Approval

Name	Designation	Approved on Date
Saumya Khati	CHRO	09Dec2021
Saumya Khati	CHRO	04Apr2024
Saumya Khati	CHRO	28Aug2024
Saumya Khati	CHRO	04Dec2024
Saumya Khati	CHRO	22 Jan 2025
Saumya Khati	CHRO	10 Mar 2025
Saumya Khati	CHRO	19 Mar 2025

3.4 Distribution list

Recipients	Location
AllUsers	Darwinbox

3.5 Change,ReviewandUpdate

This policy must be reviewed annually unless the owner considers an earlier review necessary to ensure that the policy remains current.

3.6 EffectiveDate

Effectivedateforthispolicywillbe09Dec2021.

4 Policy Overview

4.1 Purpose

Our Company is committed to providing a work environment that ensures every employee is treated with dignity and respect and afforded equitable treatment and that enables its employees to work without fear of prejudice, gender bias, or discrimination. The Company has a zero-tolerance policy towards any forms of sexual harassment at the workplace. sexual harassment is an offence and is therefore, punishable.

The Company is also committed to promoting a work environment that is conducive to the professional growth of its employees and encourages equality of opportunity.

The Company will not tolerate any form of sexual harassment and is committed to take all necessary steps to ensure that its employees are not subjected to any form of harassment. Any officer, director, manager, supervisor, or employee who engages in prohibited discrimination or sexual harassment will be subjected to appropriate and prompt disciplinary action.

4.2 Scope

This policy is eligible to all permanent employees joining across Shiprocket & Group company.

This policy has been framed by Shiprocket Limited (the “**Company**”) in accordance with the provisions of The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (as amended from time to time) and rules framed thereunder (“**Act**”). This policy applies to all categories of employees of the Company (including employees 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 by any other such name and an aggrieved person (which for avoidance of doubt includes an ‘aggrieved woman’ as defined under the Act) and such other persons as identified under this section II. While the Act is only intended to protect women, the Company is committed to providing a workplace free of sexual harassment, and so this policy is intended to be gender neutral and will apply uniformly in case of sexual harassment of any person, irrespective of the gender of the parties. The Company will not tolerate sexual harassment or prohibited discrimination, if engaged in by clients or by suppliers or any other business associates. Relationships between a reporting manager and a subordinate from any grade/level to anyone in his or her reporting hierarchy are prohibited, and any employee who can supervise or otherwise materially affect an employee’s terms and conditions of employment, should not be involved in a relationship. The workplace includes:

1. All offices or other premises where the Company’s or its’ affiliate’s business is conducted.
2. All Company-related activities are performed at any other site away from the Company’s premises.
3. Any social, business, or other functions where the conduct or comments may have an adverse impact on the workplace or workplace relations.
4. In addition to the place of work (including registered office and other offices), it shall also include any place where the aggrieved person or the respondent visits in connection with their work, during the course of and/or arising out of employment/ contract/ engagement with the Company, including transportation provided for undertaking such a journey.

This policy applies to any complaint of sexual harassment made by an aggrieved person in accordance with the Act. For the avoidance of doubt, this policy applies to any allegations of sexual harassment made by an employee, client, or visitor against an employee, if the conduct occurred on the premises of

the Company, or during the course of the employee's work for the Company.

4.3 Exclusions

None

4.4 Ownership

This document is owned and maintained by the Shiprocket HR Team.

4.5 Policy Location

This policy is easily accessible to all Shiprocket & group company's employees through Darwinbox.

4.6 Definition of Sexual Harassment and Aggrieved Person

Sexual harassment is unwelcome conduct of a sexual nature which makes a person feel offended, humiliated and/or intimidated. It includes situations where a person is asked to engage in sexual activity as a condition of that person's employment, as well as situations which create an environment which is hostile, intimidating or humiliating for the recipient. Sexual harassment can involve one or more incidents and actions constituting harassment which may be physical, verbal and non-verbal. Examples of conduct or behavior which constitute sexual harassment include, but are not limited to:

Sexual Harassment at the workplace includes: Physical

conduct:

- Unwelcome physical contact including patting, pinching, stroking, kissing, hugging, fondling, or inappropriate touching.
- Physical violence, including sexual assault.
- Physical contact and advances, e.g., touching, pinching.
- The use of job-related threats or rewards to solicit or demand sexual favors.

Verbal conduct:

- Comments on a worker's appearance, age, private life, etc.
- Sexual comments, stories and jokes
- Repeated and unwanted social invitations for dates or physical intimacy
- Insults based on the sex of the worker.
- Condescending or paternalistic remarks
- Sending sexually explicit messages (by phone/msg or by email)
- Any other verbal conduct of sexual nature
- When any such conduct is committed by a third party or outsider in relation to an employee of the Company, or vice versa during employment.

Non-verbal conduct:

- Display of sexually explicit, showing pornography or suggestive material
- Sexually suggestive gestures
- Whistling
- Leering

Any conduct that has the purpose or the effect of interfering with an individual's work performance or creating an intimidating, hostile or offensive work environment and/or submission to such conduct is either an explicit or implicit term or condition of employment, preferential or detrimental treatment in employment and/or submission or rejection of the conduct is used as a basis for making present or future employment decisions and/or is a humiliating treatment likely to affect the health or safety of an

employee.

Apart from the instances stated above, please note that the Company prohibits any and all conduct that may reasonably be interpreted as harassment whether or not such conduct is pervasive enough or severe enough to meet the technical legal requirements of harassment as defined above.

Aggrieved person: In relation to a workplace, a woman or a man, of any age, whether employed or not, who alleges to have been subjected to any act of sexual harassment by the respondent and includes contractual employees, part-time employees, temporary employees and visitors (which for avoidance of doubt includes an 'aggrieved woman' as defined under the Act).

4.7 Responsibilities regarding sexual harassment

All employees of the Company have a personal responsibility to ensure that their behavior is not contrary to this policy. All employees are encouraged to reinforce the maintenance of a work environment free from sexual harassment.

Responsibilities of Individual: It is the responsibility of all to respect the rights of others and to never encourage harassment. It can be done by:

1. Refusing to participate in any activity which constitutes sexual harassment.
2. Supporting the person to reject unwelcome behavior.
3. Acting as a witness if the person being harassed decides to lodge a complaint.

All are encouraged to advise others of behavior that is unwelcome. Often, some behaviors are not intentional. While this does not make it acceptable, it does give the person behaving inappropriately, the opportunity to modify or stop their offensive behavior.

Responsibilities of Managers: All key persons of the Company must ensure that nobody is subject to sexual harassment and there is equal treatment. They must also ensure that all employees understand that sexual harassment will not be tolerated; that complaints will be taken seriously; and that the complainant, respondent/s, or witnesses are not victimized in any way.

4.8 Complaint Mechanism

When an incident of sexual harassment occurs, the aggrieved person can bring their concern to the attention of the Internal Committee (IC) for redressal of their grievances.

In compliance with the Act, if an aggrieved person warrants formal intervention, the aggrieved person shall need to lodge a written complaint, which shall be followed by a formal redressal mechanism as described in this policy.

4.9 Internal Committee (IC)

The Company has instituted an IC for redressal of sexual harassment complaint (made by the aggrieved person) and for ensuring time bound treatment of such complaints. Initially, and till further notice, the IC will comprise of the following members.

Please refer to Annexure 1 for the details of the IC.

The IC is responsible for:

1. Receiving complaints of sexual harassment at the workplace
2. Initiating and conducting inquiry as per the established procedure
3. Submitting findings and recommendations of inquiries
4. Coordinating with the employer in implementing appropriate action
5. Maintaining strict confidentiality throughout the process as per established guidelines
6. Submitting annual reports in the prescribed format.

4.10 Procedures for resolution, settlement, or prosecution of acts of Sexual Harassment

The Company is committed to providing a supportive environment to resolve concerns of sexual harassment as under:

4.10.1 Lodging a Complaint

The complaint must be in writing and can be in the form of a letter or an email. The complainant is required to disclose their name and contact details, and where the complainant is an employee, the department, division and the location where the employee is working, in order to enable the IC to contact the complainant and take the matter forward. The supporting documents and the names and address of witnesses must also be submitted along with the complaint to any of the IC members at compliance.posh@shiprocket.com. The complainant may also contact the Presiding Officer or any member of the IC individually to make the formal complaint.

The complaint must be lodged within 3 months from the date of occurrence of the alleged incident and in case of series of incidents, within a period of 3 months from the date of the last incident. The IC may, at its sole discretion, extend the timeline by another 3 months for reasons recorded in writing, if satisfied that these reasons prevented the lodging of the complaint.

Provided that where such a complaint cannot be made in writing, the Presiding Officer or any member of the IC shall render all reasonable assistance to the aggrieved person for making the complaint in writing. If the aggrieved person is unable to lodge the complaint in account of their incapacity, the following may do so on their behalf:

1. In case of physical incapacity – legal heir, relative, friend, co-worker, an officer of Commission for Women or State Women's Commission; or any person who has knowledge of the incident, with the written consent of the aggrieved person;
2. In case of mental incapacity – legal heirs, relative, friend, special educator, a qualified psychiatrist or psychologist; or the guardian or authority under whose care they are receiving treatment or care; or any person who has knowledge of the incident jointly with their legal heir, relative or friend or a special educator or qualified psychiatrist or psychologist, or guardian or authority under whose care they are receiving treatment or care; and
3. In case of death – any person who has knowledge of the incident, with the written consent of legal heir.

In case of any other reason – any person having knowledge of the incident, with the written consent of legal heir. If the initial complaint is made to a person other than an IC member, upon receiving such a complaint, it will be the responsibility of the complaint receiver to report the same to the IC immediately.

The aggrieved person must be asked to prepare a detailed statement of incidents; a reasonable assistance shall be provided by the Presiding Officer or member(s) of IC for writing the complaint, in the event that the aggrieved person is not in a position to do so. Wherever possible the Company ensures that all the complaints of harassment are dealt with speedily, discreetly and as close as possible to the point of origin.

4.10.2 Receiving a Complaint

Dealing with incidents of sexual harassment is not like any other type of dispute. Complainants may be embarrassed and distressed and it requires tact and discretion while receiving the complaint. Associates are duty bound to assist in investigative steps, associates' wholehearted participation shall be mandatory in this regard. Whistle-blowers shall be protected from exposure, retaliation or hostility.

Care is taken to prevent any disadvantage to or victimization of either the complainant or the respondent. On receiving the complaint, the IC will normally hold a meeting with the complainant, within [three working days] of the receipt of the complaint, or within such time period as it may deem reasonable. At this meeting, the IC shall hear the complainant and record their allegations. Thereafter, the IC shall send 1 (one) of the copy of complaints received from the complainant to the respondent within a period of 7 (seven) working days or within such time period as it may deem reasonable and give him an opportunity to submit a written explanation if they so desire.

The respondent shall file their reply to the complaint along with its list of documents, and names and addresses of witnesses, within a period not exceeding 10 (ten) working days from the date of receipt of copy of complaint from the IC or such other period that the IC may specify.

4.10.3 Resolution procedure through conciliation

Once the complaint is received, before initiating the inquiry the IC may take steps to conciliate the complaint between the complainant and the respondent. This is only if requested by the aggrieved person. No monetary settlements shall be made as a basis of conciliation.

It is made clear to all parties that conciliation in itself doesn't necessarily mean acceptance of complaint by the respondent. It is a practical mechanism through which issues are resolved or misunderstandings cleared. In case a settlement is arrived at, the IC shall record and report the same to the employer for taking appropriate action. Resolution through conciliation happens within **2 weeks** of receipt of complaint.

The IC shall provide copies of the settlement to complainant and respondent. Once the settlement is arrived at as above and action is implemented, no further inquiry is conducted.

4.10.4 Resolution procedure through formal inquiry

Conducting Inquiry: The IC initiates inquiry in the following cases:

1. No conciliation is requested by aggrieved employees.
2. Conciliation has not resulted in any settlement.
3. Complainant informs the IC that any term or condition of the settlement arrived through conciliation, has not been complied with by respondent.

The IC proceeds to make an inquiry into the complaint within a period of **1 week** of its receipt of the original complaint/closure of conciliation/repeat complaint.

5. Manner of inquiry into complaint:

1. Subject to the above provisions of conciliation and settlement, IC shall, where the respondent is an employee, proceed to make an inquiry into the complaint in accordance with this policy. Where the respondent is a contract worker, the Company will work with the direct employer of the alleged offender to decide how the matter should be dealt with.
2. No legal practitioner can represent any party at any stage of the inquiry procedure.
3. The IC makes inquiry into the complaint in accordance with the principles of natural justice.
4. In conducting the inquiry, the Presiding Officer and the external member of the IC shall always be present.
5. For the purpose of making an inquiry, the IC shall have same powers as are vested into a Civil Court under the Code of Civil Procedures, 1908 when trying a suit in respect of the following manners:
 - a. Summoning and enforcing the attendance of any person and examining on oath.
 - b. Requiring the discovery and production of documents; and
 - c. Any other matter as prescribed under the Act/Rules.

6. Interim relief

During pendency of the inquiry, on a written request made by the aggrieved person, the IC may recommend to the employer to:

1. Transfer the aggrieved person or the respondent to any other workplace.
2. Grant leave to the aggrieved person of maximum 3 months, in addition to the leave they would be otherwise entitled to under the Company's policies and/or law.
3. Prevent the respondent from assessing complainant's work performance or writing the complainant's appraisal.
4. Suspend the respondent [with full pay] during the pendency of the inquiry if the circumstances so merit.
5. Grant such other relief as may be appropriate.

The leave granted to the aggrieved person as above shall be in addition to the leave they would be otherwise entitled to. On the recommendation of IC, the employer shall implement the recommendations. Once the recommendations of interim relief are implemented, the employer will send report to the IC regarding the same.

7. Termination of Inquiry

IC set up by the Company may terminate the inquiry or give ex-parte decision, if either party i.e., complainant or respondent respectively is absent for 3 consecutive hearings, without sufficient reason. 15 day written notice to be given to the party, before termination or ex-parte order.

8. Inquiry procedure

All proceedings of the inquiry are documented and maintained by the Company. The IC interviews the respondent separately and impartially. The IC states exactly what the allegation is and who has made the allegation. The respondent is given full opportunity to respond and provide any evidence etc. Detailed notes of the meetings are prepared which may be shared with the respondent and complainant upon request. Any witnesses produced by the respondent are also interviewed and statements are taken.

If the complainant or respondent desires to cross examine any witnesses, the IC facilitates the same and records the statements. In case a complainant or respondent seeks to ask questions to the other party, they may give them to the IC which asks them and records the statement of the other party.

Any such inquiry is completed, including the submission of the inquiry report, within **90 days** of the date on which the inquiry commenced. The inquiry procedure ensures absolute fairness to all parties.

9. Action to be taken after inquiry.

Post the inquiry the IC submits its report containing the findings and recommendations to the employer, within **10 days** of completion of the inquiry. The findings and recommendations are reached from the facts established and are recorded accurately.

10. Complaint unsubstantiated

Where the IC arrives at the conclusion that the allegation against the respondent has not been proven, it recommends to the employer that no action is required to be taken in this matter. Further, the IC ensures that both parties understand that the matter has been fully investigated, that the matter is now concluded, and neither will be disadvantaged within the Company.

11. Complaint substantiated

Where the IC arrives at the conclusion that the allegation against the respondent has been proved, depending upon the gravity of the offence and without prejudice to any legal right(s), it recommends to the employer to take necessary action for sexual harassment as misconduct, in accordance with the applicable service rules and policies, and this may include:

1. Counselling or training to address any specific issues.
2. Censure or reprimand.
3. Written apology to be tendered by respondent to the complainant clearly indicating that such behavior will not be repeated and that no retaliatory steps will be taken by him or other on his behalf against the complainant.
4. Written or verbal warning which will also be noted in the respondent's record.
5. Withholding promotion, bonus and/or increments
6. Suspension
7. Termination
8. Change of work assignment or transfer
9. Deduction, from salary of the respondent such sum as it may consider appropriate to be paid to the aggrieved person or their legal heirs, as it may determine in accordance with applicable law, including without limitation the Act. Provided that in case the Company is unable to make such deduction from the salary of the respondent due to their absence from the duty or cessation of employment it may direct to the respondent to pay such sum to the aggrieved person
10. Or any other action that the management may deem fit.

Provided further that in case the respondent fails to pay the sum referred to above, the IC may forward the order for recovery of the sum as an arrear of land revenue to the concerned District Officer.

If the complainant desires to take criminal action against the respondent, there shall be no objection by the IC and the Company. In such an event, the Company will attempt to provide all reasonable assistance to the complainant. The Company may also choose to take criminal action against the respondent.

The employer at the Company acts upon the recommendations within **60 days** and confirms to the IC. Post implementation of the actions, follow up with the complainant occurs to ascertain whether the behavior has in fact stopped, the solution is working satisfactorily and if no victimization of either party is occurring. This follow-up may be undertaken by the complainant's Manager supported by the Compliance Officer of the Company.

4.10.5 Malicious Allegations

Where the IC arrives at the conclusion that the allegation against the respondent is malicious or the aggrieved person or any other person making the complaint has made the complaint knowing it to be false or the aggrieved person or any other person making the complaint has produced any forged or misleading document, it may recommend to the employer to take action against the complainant or the person making the complaint. The IC may also recommend to the employer to take appropriate disciplinary action if it arrives at a conclusion that any witness has given false evidence or produced any forged or misleading document.

The action recommended should be similar to the ones proposed for the respondent in case of substantiated complaints. While deciding malicious intent, the IC should consider that mere inability to substantiate a complaint need not mean malicious intent. Malicious intent must be clearly established through a separate inquiry.

4.10.6 Confidentiality

The identity of the complainant, respondent, witnesses, statements and other evidence obtained in the course of inquiry process, recommendations of the IC, action taken by the employer is considered as confidential materials, and not published or made known to public or media by the IC, the Company, the complainant, the respondent and the witnesses. However, provided that information may be disseminated regarding justice secured to any victim of sexual harassment without disclosing the name, address, identity or any other particulars calculated to lead to the identification of the aggrieved person and witnesses.

To protect the interests of the victim, the accused person and others who may report incidents of sexual harassment, confidentiality will be maintained throughout the investigatory process to the extent practicable and appropriate under the circumstances.

Any person including complainant, respondent, witnesses, and members of the IC who are employees of the Company, contravening the confidentiality clauses is subject to disciplinary action in accordance with Company policies.

4.10.7 Protection against Retaliation

The Company prohibits any form of retaliation against anyone who has raised a complaint of sexual harassment or has cooperated in any inquiry involving a complaint of sexual harassment.

Any individual who believes that they are experiencing retaliation, by way of intimidation, pressure to withdraw the case or threats for reporting, testifying or otherwise participating in the proceedings, should report this to the IC or [Human Resources], and the Company will then address the concerns raised. Any person who is found to be guilty of retaliation may be subject to appropriate disciplinary action. Anyone who abuses this procedure (for example, by maliciously putting an allegation knowing it to be untrue) would also be subject to disciplinary action.

4.10.8 Appeal

Any party not satisfied or further aggrieved by the implementation or non-implementation of recommendations made, may appeal to the appellate authority in accordance with the Act and rules, within 90 days of the recommendations being communicated.

4.11 ThirdPartyHarassment

Where sexual harassment occurs as a result of an act or omission by any third party or outsider, the Company shall take all steps necessary and reasonable to assist the affected person in terms of support and remedial and preventive action.

4.12 Mechanisms to Strengthen Implementation of the Policy:

1. The employees are required, at all times, to abide by the guidelines provided in this policy.
2. The Company will ensure that the IC functions in a free and fair manner.
3. The Company will display at any conspicuous place in the workplace, the penal consequences of sexual harassment and details of the members constituting the IC.
4. Please contact the Human Resources Department if the employees have any questions or clarifications regarding this policy.

4.13 Conclusion

In conclusion, the Company reiterates its commitment to providing its employees with a workplace free from harassment/ discrimination and where every employee is treated with dignity and respect. The Company reserves the right to amend, suspend or withdraw this policy, guidance, and procedure at any time without notice. Further, the Company reserves the right to administer discipline in such a manner as it deems appropriate to the circumstances, and may, in its sole discretion, eliminate any or all the steps.

This Policy is adopted by a resolution passed by the board of directors of the Company at its meeting held on December 09, 2021.

12. Annexure I

Entity	S No	E Code	Name	Gender	Designation	Department
Shiprocket	1	BFRS01285	Praful Poddar	Male	Chief Product Officer	Product Development
	2	BFRS01535	Pooja Bhatt Singhania (Presiding Officer)	Female	Vice President	Engineering
	3	BFRS01578	Sumeet Jain	Male	Vice President	Enterprise KAM
	4	BFRS01937	Deepa Kapoor	Female	Director	Finance
	5	BFRS01566	Charu Chandna	Female	Senior Manager	Human Resources
SRF	6	BFRS00131	Jisha Bawa (Presiding Officer)	Female	Director	Human Resources
	7	BFRS00850	Nikita Bisht	Female	Associate Director	FinOps
	8	BFRS02326	Rajan Singh Bora	Male	Senior Manager	SRF (North)
	9	BFRS02330	Ramesh Babu	Male	Senior Manager	SRF (South)
	10	BFRS02032	Prachi Maheshwari	Female	Associate Manager	SRF (North)

Entity	S No	E Code	Name	Gender	Designation	Department
Pickrr	1	PTPL0330	Heena Bhatia (Presiding Officer)	Female	Senior Manager	Operations
	2	BFRS01747	Pradeep Panghal	Male	Senior Manager	Human Resources

Entity	S No	E Code	Name	Gender	Designation	Department
Omuni	1	BFRS02431	Suruchi Relhan (Presiding Officer)	Female	Associate Director	Human Resources
	2	117483	Prasanjit Das	Male	Associate Director	Quality, Tech Support & DevOps

External NGO Member:

Entity	S No	Name	Gender	Designation
ExternalNGO Memberforall entities	1	Jyotica Bhasin (External Member)	Female	–

For any concerns the employees can reach out to respective HRBP

Disclaimer: The Company reserves the right to amend, suspend or withdraw this policy, guidance and procedure at any time without notice. Further, the Company reserves the right to administer discipline in such a manner as it deems appropriate to the circumstances, and may, in its sole discretion, eliminate any or all of the steps

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