

POLICY ON PREVENTION OF SEXUAL HARASSMENT AT THE WORKPLACE

1. OBJECTIVE

Masoom is committed to providing a safe and healthy work environment and does not permit any form of sexual harassment in the workplace. Everyone working have a shared responsibility in contributing to a safe work environment. In accordance with the provisions of Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal Act, 2013 (Act), Tri-legal has provided a framework to specifically deal with acts of sexual harassment at the workplace. This policy is intended to be gender neutral and will apply to case of sexual harassment of any person, irrespective of the gender of the parties.

2. SCOPE AND APPLICABILITY

This policy applies to all employees including trainees, teachers, staff at different school locations. This policy is applicable not only on Masoom premises, but in instances where the resources have occasion to interact on work. Masoom will not tolerate any form of sexual harassment.

3. WHAT CONSTITUTES SEXUAL HARASSMENT

Sexual harassment includes any one or more of the following acts or behavior (whether directly or by implication).

- (a) Physical contact or advances;
- (b) A demand or request for sexual favor;
- (c) Sexually colored;
- (d) Showing pornography; or
- (e) Any other unwelcome physical, verbal or non-verbal conduct of sexual nature.

Examples of sexual harassment include but are not limited

Verbal: Repeated requests for dates, sexual innuendoes, sexual epithets, derogatory slurs, foul or obscene language, inappropriate jokes/propositions, questions about another's sexual experiences or sexually suggestive or insulting remarks or sounds.

Visual/Non –Verbal: Inappropriate written materials (including email and online content), derogatory posters, cartoons or drawings, suggestive objects and pictures, graphic commentaries, leering or obscene gestures; and

Physical: Assault of a sexual nature, such as rape, molestation or attempts to commit these assaults. Any other physical conduct that is sexual in nature, such as touching, pinching, patting, grabbing, brushing against another's body.

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| Darshan H. Chaudhari | Nikita Ketkar | 01.04.2023 | 01 |



If any of the following circumstances exist in relation to or connected with any act or behavior of sexual harassment (as set out above), such conduct would amount to sexual harassment at the workplace:

- (a) Implied or explicit promise of preferential treatment at work;
- (b) Implied or explicit threat of detrimental treatment at work;
- (c) Implied or explicit threat about present or futures employment/engagement status;
- (d) Interference with work or creating intimidating or offensive or hostile working environment; or
- (e) Humiliating treatment likely to affect a Resource's health or safely.

4. THE INTERNAL COMMITTEE

An Internal- Committee has been constituted at Head Office. The names and contact details of the members of the Internal Committee is set out in the annexure. Any changes will be committed through notice.

5. REPORTING A COMPLAINT

Any person who has been subject to sexual harassment (Complainant), must make a written complaint to the location specific committee email id (POSHHO@masoomedu.com.org) or to any member of the Internal Committee for the location at the earliest (in any case within 90 days) of the incident of sexual harassment, or if in a series of incidents, at the earliest (and in any case within 90 days) after the last incident of sexual harassment. The Internal Committee may, for the reasons to be recorded in writing, extend the time limit, not exceeding another 90 days, if it is satisfied that the circumstances were such which prevented the Resources from filing a complaint within the initial 90 days period.

If a Complainant is unable to make the complaint, a relative, friend, co-worker or another third party (referred to as authorized person) may make the complaint on behalf of the Complainant in accordance with applicable law.

Once a complaint is received, the Internal Committee will initiate an inquiry in accordance with applicable law. Additional information on the procedure is available here. During the pendency of the inquiry, the Internal Committee may, at its discretion, recommend any interim measures as it deems necessary (including a recommendation that the accused be placed on suspension).

6. DISCIPLINARY ACTION

In the event employee is found to be guilty of sexual harassment, or of filing a false and malicious complaint, or giving false evidence during the inquiry, he/she will be subject to disciplinary action as recommended by the Internal Committee. Such disciplinary action may include, training/ counseling, written or verbal warning, withholding increment, bonus or promotion, suspension of services without pay, termination of the services with Masoom or such other action as the Internal Committee may deem appropriate.

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7. THIRD PARTY HARASSMENT

If any Resource has been subject to sexual harassment during the course of work for Masoom by any third party, including visitors, clients etc, Masoom will take appropriate remedial measures, including assisting the employee to raise a complaint.

8. RESPONSIBILITIES:

- All employees must read and abide by the policy, attend trainings and speak to the Human Resources Department or the Internal Committee, when they have questions.
- Everyone is responsible for reporting concerns about sexual harassment in a timely fashion. Please note that a formal complaint and the related process will commence only when the complaint is filed with the Internal Committee by the aggrieved person or the aggrieved person has provided his/her consent to initiate a formal investigation.
- Complaints of sexual harassment and any resolution of the same will be kept confidential, to the extent possible. Violation of confidentiality can result in disciplinary action, up to and including termination.

9. Confidentiality:

All concerns will be treated in confidence and every effort will be made not to reveal your identity if you so wish. At the appropriate time, however, you may need to come forward as a witness.

POSH

Internal Complaint Committee

| Sr. No | Name | Designation | Contact Number | Email ID |
|--------|--------------------------|-----------------|----------------|-------------------------------------|
| 1 | Ms. Kunda Shelar | President | 91675 77131 | kunda@masoomeducation.org |
| 2 | Ms. Anjali Gokarn | External Member | 99691 94291 | gokarnanjali@gmail.com |
| 3 | Ms. Maya Jadhav | External Member | 88795 37560 | stci.maya567@gmail.com |
| 4 | Mr. Ganesh Naik | Member | 75066 41045 | communications2@masoomeducation.org |
| 5 | Mr. Darshan H. Chaudhari | Member | 9167709828 | hr@masoomeducation.org |
| 6 | Mr. Nilesh Thombre | Member | 98702 27296 | nilesh.t@masoomeducation.org |

For Masoom



Nikita Ketkar
CEO



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