

3C IT's Policy on Prevention, Protection And Redressal Of Sexual Harassment Of Women At Workplace



This POSH Policy is an official document of 3C IT SOLUTIONS & TELECOMS (INDIA) LIMITED and has been framed in compliance with the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and its Rules. It reflects the Company's commitment to fostering a safe, inclusive, and respectful workplace for all women employees and stakeholders. The Policy is intended solely for awareness, guidance, and implementation within 3C IT and shall not be reproduced, circulated, or transmitted in any form outside the Company without prior written authorization. Employees and associates are expected to uphold the principles of this Policy in both letter and spirit, and any unauthorized use, disclosure, or misuse shall invite appropriate action under applicable law and Company policies.

TABLE OF CONTENTS

❖ INTRODUCTION AND OBJECTIVE	3
❖ APPLICABILITY	3
❖ POLICY INTERPRETATION.....	3
❖ POLICY PROHIBITIONS	5
❖ CONSEQUENCES OF BREACH	7
❖ EXPECTED BEHAVIOURS, VALUES AND CONDUCT	8
❖ REPORTING MECHANISM	8
❖ INTERIM RELIEF	9
❖ HANDLING MALICIOUS COMPLAINTS AND FALSE EVIDENCE.....	9
❖ CONFIDENTIALITY	9
❖ CULTURE BUILDING INITIATIVES.....	10
❖ INDEMNIFICATION	10
❖ CLOSING STATEMENT	10
ANNEXURES.....	11

❖ INTRODUCTION AND OBJECTIVE

At 3C IT SOLUTIONS & TELECOMS (INDIA) LIMITED (“3C IT”, “Company”, “We” or “Our”), we recognize that every individual has a right to work with dignity and to ensure the same, 3C IT has adopted the culture of zero tolerance towards any act of sexual harassment. Therefore, in compliance with the Sexual Harassment of Women at the Workplace (Prevention, Prohibition and Redressal) Act, 2013 (“POSH Act”) and its Rules (“Rules”), the present policy (“Policy”) aims to outline the rules and regulations towards the protection of women at workplace, prohibition of acts of sexual harassment and defining a redressal mechanism ensuring an environment where each employee can thrive with dignity, integrity, and mutual respect.

The Objective of this Policy is to make all the employees, partners, clients, vendors, contractors, visitors, and stakeholders of 3C IT fully aware of their rights, duties, and responsibilities under the POSH Act and Rules. The effectiveness of this Policy depends on the shared commitment of everyone at 3C IT, and therefore, it is intended to be implemented not just in form but also in spirit. The workplace culture at 3C IT is built on respect, dignity, and accountability, and every person associated with the Company is expected to comply with this Policy in letter, and to report any non-compliance to the Management immediately upon such occurrence or knowledge.

At 3C IT, any act of sexual harassment constitutes serious misconduct. We uphold a strict zero-tolerance approach towards such behavior against women employees at the workplace¹. Such acts will be dealt with in accordance with the POSH Act and Rules and any other laws in force. All employees, members, and persons connected with the Company are therefore expected to observe the prohibitions under this Policy and demonstrate their commitment to preventing sexual harassment in every aspect of workplace conduct. Such acts are punishable in accordance with the POSH Act and Rules, and persons associated with the Company are required to take heed of the prohibitions under this Policy and affirm their intent and actions to prevent sexual harassment at the workplace.

❖ APPLICABILITY

This Policy applies to all existing, past, or proposed employees of 3C IT, including permanent, temporary, probationary, trainees, apprentices, interns, and contractual staff, as well as members, clients, vendors, consultants, contractors, suppliers, agents, representatives, service providers, and persons engaged with the Company for any work, whether contractually or otherwise. It may further include such other persons visiting the workplace for purposes of delivery, supply, service, or discharge of any work assigned by or relating to the Company. Provided that, this Policy shall be made applicable only to such persons as are identified by the Aggrieved Party in accordance with the provisions of the POSH Act and its Rules.

❖ POLICY INTERPRETATION

For this Policy, unless the context otherwise requires, the following terms shall have the meanings set out below:

“**Aggrieved Person**” shall mean and include, in relation to a Workplace, any woman (“she” / “her”), of any age, whether employed at 3C IT or not, who alleges through a written complaint filed with the Internal Committee to have been subjected to any act of sexual harassment². The term shall further include, in case of physical and/or mental incapacity, her legal guardian, parent, relatives, friends, co-workers, an officer of the National or State Women’s Commission, a special educator, or any other person with knowledge of the incident, provided

¹ Section 3(i) of POSH Act, 2013.

² Sec. 2(a) (i), POSH Act, 2013

such representation is made with her consent or upon furnishing of written consent or a medical officer's certificate of incapacity³. In case of Aggrieved woman's fatality, it shall include her legal heirs, representatives, successors, administrators, and/or executors.

"Complaint" shall mean and include the complaint of sexual harassment filed by an Aggrieved Party comprising of the time, date, place of incident, details of incident, name of Respondent, name of witnesses, if any, and disclosing the working relationship between the Aggrieved Party and Respondent filed in writing with the IC in tenure in six copies along with supporting documents and addresses of the witnesses⁴.

"Employee" shall mean and include a person employed by the management of 3C IT at the workplace, for any work on regular, temporary, ad-hoc or daily wage basis, either directly or through an agent, including a contractor, whether for remuneration or not, or working voluntarily or otherwise, whether the terms of employment are express or implied and includes a coworker, contract worker, intern, probationer, trainee, apprentice or by any other such name⁵.

"Employer" shall mean and include any person(s) or any committee at 3C IT responsible for the formulation, implementation, and administration of work, service/s, policy/ies, activity/ies, and/or assignment/s in the Workplace that enables management, supervision, and control⁶ of the Workplace.

"Internal Committee" (hereinafter referred to as **"IC"**) shall mean and include the independent, unbiased committee, comprising the appointed Members, constituted by 3C IT under the POSH Act and Rules to receive, inquire into, and redress complaints filed by Aggrieved Party of sexual harassment at the workplace, ensuring a fair, transparent, and timely grievance resolution process for Aggrieved Women.⁷

"IC in tenure" shall mean and include the IC appointed by 3C IT for the period as defined under the POSH Act through the requisite documentation whose names are displayed at common workplace within 3C IT's premises and is in existence at the time of filing of the complaint. The composition of such an IC in tenure is attached in this Policy as **Annexure A**.

"Member/s" shall mean and include a present or previous Member/s of the IC⁸;

"Presiding Officer" shall mean and include the person⁹ presiding over the IC in tenure as the chairperson.

"Parties" shall mean and include Aggrieved Party and the Respondent involved in the POSH proceeding/inquiry.

"POSH Proceeding/ Inquiry" shall mean and include the formal inquiry process undertaken by IC under this Policy and under the POSH Act and Rules to receive, assess, investigate, and resolve complaints of sexual harassment at the workplace. This includes the submission of a written complaint, preliminary review, inquiry proceedings, evidence collection, hearing of parties and witnesses, documentation of findings, and issuance of recommendations or disciplinary actions as per applicable law and Company policy.

"Respondent" shall mean and include, in relation to the Workplace, any identified man, whether employed with the Company or not, against whom the Aggrieved Party has made a Complaint¹⁰.

"Sexual Favours" or "Sexual Manner" shall mean and include any demand of any unwanted or inappropriate act, conduct or any cooperation of a sexual nature, through the medium of any act or such attempt of sexual harassment; whether verbal, written which can be implied or expressed.

³ Clause (f) of Rule 2 of POSH Rules, 2013.

⁴ Rule 7, Sub-rule 1 of POSH Rules, 2013 and Section 9 of the POSH Act, 2013.

⁵ Section 2(f) of POSH Act, 2013.

⁶ Section 2(g) (ii) (iii) of POSH Act, 2013

⁷ Section 2(h) of POSH Act, 2013.

⁸ Section 2(j) of POSH Act, 2013.

⁹ Section 2(l) of POSH Act, 2013.

¹⁰ Section 2(m) of POSH Act, 2013.

“**Work**” shall mean and include any assignment, task, activity, workload, project, service, act, and/or deed either expressly or impliedly assigned by the Employer and/or reasonably required to be carried out in accordance with the post or designation held by the person or Employee associated with 3C IT.

“**Workplace**¹¹” shall mean and include the office premises of 3C IT, its client locations, official work sites, and/or any location or site where the Aggrieved Party, employee or person associated with 3C IT is permitted in writing to visit for any official work of 3C IT, including the parking areas, elevators, staircases, canteens, eateries, corridors, conference rooms, cabins, online chatrooms, email communication platforms, digital platforms, permitted to be utilized for official work of 3C IT and all such premises or online platforms where work of 3C IT is carried out by any prudent person in reasonable capacity; however, excludes homes and residential premises of the Aggrieved Party, employee or person associated with 3C IT who are working from remote locations and also any other location or site frequented by the Aggrieved Party, employee or person associated with 3C IT who are working from remote locations of which the Company may or may not have any knowledge, but which is not recommended, permitted or intimated by the management of 3C IT.

“**Sexual Harassment**” shall mean and include any or all the acts included as Policy Prohibitions under this Policy committed by the Respondent against such Aggrieved Party. It also includes any other acts not only specifically labelled as Policy Prohibition hereby but also any such implied or expressed acts to the extent of such effect which Aggrieved Party deems fit and which affects Aggrieved Party’s dignity, safety, and sense of a safe work environment; irrespective of the intent of the Respondent behind such act or conduct.

❖ POLICY PROHIBITIONS

3C IT strictly maintains **zero tolerance** towards any form of sexual harassment at the workplace or during any work-related interaction/s, event/s, or communication/s. The Company strictly prohibits the following behaviors, whether committed once or repeatedly, in-person or virtually, in writing, electronically/digitally, verbally, or non-verbally to any extent whatsoever and irrespective of intent.

<u>Unwelcome Sexual Behaviours¹²</u>	
We strictly prohibit any unwelcome sexual behaviour in the workplace. Such behaviours include, but are not limited to:	<ul style="list-style-type: none"> ▪ Physical contact of a sexual nature and unwelcome sexual advances. ▪ Demanding or requesting for sexual favours, whether verbal, implied, or explicit. ▪ Making sexually coloured or suggestive remarks, innuendos, or jokes. ▪ Displaying, showing, or sharing pornography or sexually explicit material in any form, including digital, print, or visual formats. ▪ Attempted or actual sexual harassment, physical assault, molestation, grievous hurt, rape, or any other form of bodily harm to woman employee. ▪ Any other unwelcome physical, verbal, non-verbal, or written conduct of a sexual nature.
<u>Quid Pro Quo Harassment</u>	
We strictly prohibit any form of Quid Pro Quo sexual harassment, where employment-related benefits or detriments are linked	<ul style="list-style-type: none"> ▪ Implied or explicit promise of preferential treatment, including but not limited to favourable reviews, salary increases, promotions, increased benefits, or continued employment in exchange for sexual favours.

¹¹ Section 2(o) of POSH Act, 2013.

¹² Section 2(n) of POSH Act, 2013.

<p>to sexual favours. Such behaviours include, but are not limited to:</p>	<ul style="list-style-type: none"> ▪ Implied or explicit threat of detrimental treatment in employment, including but not limited to termination, suspension, unfavorable performance reviews, withheld opportunities, salary deductions, linked to acceptance or rejection of sexual conduct. ▪ Implied or explicitly withholding a woman employee’s salaries, promotions, benefits, flexible working hours, leaves, assignments, work, clients, projects, or any other such work-related act, which is required for professional growth and is other accessible to all other employees of 3C IT, only for demanding, requesting, seeking, or entrapping the woman employee so subjected for sexual favors.
<p><u>Specific Acts Connoting Sexual Nature</u></p>	
<p>We strictly prohibit any act or behaviour of a sexual nature that creates an uncomfortable, hostile, or intimidating work environment for any employee. Such acts include, but are not limited to:</p>	<ul style="list-style-type: none"> ▪ Subjecting an employee to unwelcome physical contact or acts of intimacy, including hugging, grabbing, brushing, caressing, patting, molesting, or touching, or threatening to commit such acts. ▪ Making unwelcome sexual advances, flirtations, or propositions, even after repeated refusals. ▪ Making jokes, using implications, or hinting or any such sly remarks, making such backhanded comments or making sexist remarks with sexual connotations or of sexual nature. ▪ Showing, sharing, or possessing pornography or sexually explicit material, whether physical, digital, or visual. ▪ Staring, making suggestive facial expressions or gestures, or any conduct that creates discomfort or is perceived as unsafe. ▪ Sending or sharing sexually explicit or offensive content via email, messaging apps, any other electronic medium or any written communication channels. ▪ Persistently asking an employee out on a date after refusal, in any form of communication. ▪ Making unwelcome comments, gossip, or offensive remarks about an employee’s personal life, body, clothing, gender, or preferences. ▪ Using offensive or demeaning language based on gender, sexuality, or personal identity. ▪ Engaging in banter or jokes of sexual nature during meetings, training sessions, or informal work gatherings. ▪ Entering an employee’s personal space, home, vehicle, or private property with sexual intent, despite explicit instructions to stop. ▪ Repeatedly messaging, contacting, or following an employee digitally, ignoring clear signs of discomfort or disinterest. ▪ Any act or comment that contributes to sexual hostility, objectification, humiliation, or creates an intimidating, offensive, or hostile workplace.
<p><u>Abuse of Authority or Influence</u></p>	
<p>We maintain a strict zero-tolerance policy against the abuse of authority or power to subject any woman employee to sexual harassment. Such prohibited conduct includes, but is not</p>	<ul style="list-style-type: none"> ▪ Using a position of power, authority, or seniority to manipulate, coerce, or pressure a subordinate employee into situations with sexual intent. ▪ Intruding into an employee’s personal life under the pretext of mentorship, performance reviews, or professional guidance, causing or attempting to cause discomfort of a sexual nature.

limited to:	<ul style="list-style-type: none"> ▪ Indulging in acts of undue influence to target, intimidate, or coerce an employee to submit to acts of a sexual nature. ▪ Utilizing one’s authority, influence, or position or enticing others to use theirs to harass an employee in any form.
<u>Digital and Remote Work Contexts</u>	
We strictly prohibit any form of sexual harassment occurring through digital, remote, or virtual work platforms. Such prohibited conduct includes, but is not limited to:	<ul style="list-style-type: none"> ▪ Misusing Company-authorized platforms, collaboration tools, or digital spaces to send sexually explicit or suggestive content. ▪ Sharing inappropriate content, making comments, or displaying offensive visuals during virtual meetings or any platform of digital communication. ▪ Using phone calls, messages, or social media posts to harass women colleagues in connection with work.
<u>Retaliation and Victimization</u>	
We strictly prohibit any form of retaliation or victimization. Such prohibited conduct includes, but is not limited to:	<ul style="list-style-type: none"> ▪ Any act of victimization, intimidation, isolation, discrimination, or bias directed at the Aggrieved Party directly or indirectly, witnesses, ICC members, or any individual involved in the inquiry process.
<p><u>Note:</u></p> <p><i>Any act, behaviour, or conduct whether verbal, non-verbal, written, physical, or digital not specifically enumerated in this policy but which carries the essence of being sexually inappropriate, unwelcome, or offensive, and affects the dignity, safety, or mental well-being of a woman in the workplace, shall also be deemed as sexual harassment and is strictly prohibited under this policy.</i></p>	

❖ CONSEQUENCES OF BREACH

The above-mentioned Policy prohibitions are binding obligations under the Policy. Any breach, whether partial or complete, will be treated as a serious act of misconduct and considered a violation of the employment terms. Depending on the severity of the violation, strict disciplinary action¹³ shall be taken, including but not limited to:

Immediate termination of employment	Unpaid suspension	Withholding of promotion, salary increment, or demotion
Civil or criminal legal remedies	Filing of a police complaint or FIR	Censure, reprimand, warning, or disciplinary review
Mandatory remedial or corrective activities	Monetary compensation or withholding of full and final settlement, or deductions	Any other action deemed appropriate by 3C IT upon recommendation of the IC

¹³ Rule 9 of POSH Rules, 2013.

❖ EXPECTED BEHAVIOURS, VALUES AND CONDUCT

This Policy not only defines what is prohibited but also sets clear expectations for how employees should act. Each employee plays a vital role in creating and sustaining a workplace that is safe, respectful, and supportive.

Aspect	Particulars
Respect and Dignity	<ul style="list-style-type: none"> ▪ Treat all employees, regardless of gender, background, or seniority, with fairness, dignity, and empathy. ▪ Abstain from any conduct, verbal, non-verbal, or physical, that could be demeaning, objectifying, or discriminatory.
Commitment to Inclusion	<ul style="list-style-type: none"> ▪ Promote an inclusive culture by ensuring equal participation and respect for diverse perspectives ▪ Avoid exclusionary behaviour, stereotyping, or microaggressions in any form.
Professional Integrity	<ul style="list-style-type: none"> ▪ Demonstrate professionalism in tone, language, and conduct in every workplace interaction. ▪ Refrain from gossip, personal judgments, or casual behaviour that infringes on personal or professional boundaries. ▪ Listen to any complaints or suggestions raised by your team and adhere to change your behavior accordingly.
Boundaries and Consent	<ul style="list-style-type: none"> ▪ Acknowledge personal space, autonomy, and an individual's right to decline. ▪ Avoid unsolicited physical contact, intrusive personal questions, or flirtatious behavior which causes discomfort.
Responsible Communication	<ul style="list-style-type: none"> ▪ Exercise discretion and empathy in verbal, written, and digital communication. ▪ Choose words, tone, language and content carefully, both in spoken and written form, to ensure respect and psychological safety.
Digital and Virtual Conduct	<ul style="list-style-type: none"> ▪ Use professional decorum in emails, chats, video calls, and collaborative platforms. ▪ Sharing inappropriate content, personal remarks, or misuse of digital platforms constitutes misconduct.
Bystanders Responsibility	<ul style="list-style-type: none"> ▪ Employees who witness harassment or inappropriate conduct must act responsibly by reporting or offering support through designated channels.
Confidentiality and Privacy	<ul style="list-style-type: none"> ▪ Safeguard the privacy of all individuals involved in complaints or inquiries. ▪ Avoid any disclosure or informal discussion of ongoing grievance matters to anyone within the Company or any third party.
Supportive Environment	<ul style="list-style-type: none"> ▪ Offer non-judgmental support to colleagues who raise concerns or discomfort. ▪ Respect their autonomy while guiding them to formal redressal channels.
Non-Retaliation	<ul style="list-style-type: none"> ▪ Not indulging in act, direct or indirect, that could be seen as retaliation against Aggrieved Party or someone who has reported misconduct or supported the inquiry process or witness of the harassment or any member of IC.
Leadership Obligations	<ul style="list-style-type: none"> ▪ Managers and senior employees must act as role models in ethical leadership and inclusive decision-making. ▪ They are accountable for proactively reinforcing a culture of respect and zero tolerance towards sexual harassment.
Compliance Beyond Minimums	<ul style="list-style-type: none"> ▪ Employees must not only follow the legal requirements but also embody the broader values of equity, care, and respect. ▪ Upholding these principles is integral to 3C IT's identity and culture.

❖ REPORTING MECHANISM

In an unfortunate event that an upon being subjected to any act or form of sexual harassment, an Aggrieved Party shall file a written complaint within three (03) months from the date of the incident, or the last in a series of incidents, with the Internal Committee ("IC"), any of its Members, or through the official IC email address i.e. internalcomplaintscommittee@3citsolutions.com.

The Complaint must clearly state the name of the Aggrieved Person, the name of the Respondent, the working relationship between them, the exact date, time, and place of the incident, a detailed description of the incident(s), names and designations of witnesses in respect of the workplace, and supporting documents or evidence relevant to the incident of sexual harassment.¹⁴

Any complaint filed beyond the period of 90 days from last incident of sexual harassment shall be required to be filed along with the reason for delay in filing, and the IC may first decide upon the delay and pass its order in respect of the same prior to accepting and/or rejecting the complaint.

Upon receipt of a complaint, the IC shall serve a copy to the Respondent within Seven (07) working days. The Respondent shall be required to submit a written reply, along with supporting evidence and a list of witnesses, within Ten (10) working days; failing which no extension shall be granted to the Respondent. The IC shall conduct the Proceedings in accordance with the provisions of the POSH Act and its Rules. Upon receiving a written complaint, the IC may, at the Aggrieved Party's written request and after confirming it is voluntary, attempt conciliation within Two (02) weeks¹⁵. The IC aims to complete the inquiry within Ninety (90) days and submit its report, including findings and recommendations, to the employer and both parties within Ten (10) days of completion of such inquiry. If either party misses Three (03) consecutive hearings without any valid reason, the IC may proceed ex-parte or close the ongoing case after Fifteen (15) days' notice¹⁶.

❖ INTERIM RELIEF

During the inquiry, the IC may permit any measures needed to provide the Aggrieved Party with a safe, supportive, and non-hostile work environment¹⁷. The Employer shall ensure prompt implementation of these measures and confirming compliance to the IC to ensure that the Aggrieved Party receives timely and effective support¹⁸.

❖ HANDLING MALICIOUS COMPLAINTS AND FALSE EVIDENCE

Where the IC finds that a complaint was made maliciously, with knowledge of its falsity, or supported by forged or misleading evidence, it may recommend disciplinary action against the complainant or any involved witness¹⁹.

❖ CONFIDENTIALITY

We recognize that confidentiality is central to protecting the Aggrieved Party and is a core tenet of this policy. All details of the complaint, parties involved, witness statements, evidence, proceedings, IC recommendations, and employer actions are strictly confidential. Unauthorized disclosure in any form directly or indirectly is prohibited and employee indulging in such acts will be required to pay the penalty of Rupees 5,000/- (INR Five Thousand Rupees Only) for every unauthorized disclosure, and 3C IT and/or the IC shall take the appropriate legal or disciplinary action²⁰.

¹⁴ Section 9 (1) of the POSH Act.

¹⁵ Section 10 of POSH Act, 2013.

¹⁶ Sub-rule 5 of Rule 7 of POSH Rules, 2013.

¹⁷ Section 12(1), (2) of POSH Act, 2013 and Rule 8 of POSH Rules, 2013.

¹⁸ Section 12(3) of POSH Act, 2013.

¹⁹ Section 14 of POSH Act, 2013

²⁰ Section 16 of POSH Act, 2013, Section 16 and 17 of POSH, Act, 2013 and Rule 12 of POSH Rules, 2013.

❖ CULTURE BUILDING INITIATIVES

At 3C IT, we prioritize prevention of sexual harassment through proactive, culture-driven efforts and not merely by formulating policies²¹. All employees must attend mandatory POSH awareness and sensitization programs twice a year. Non-compliance shall be treated as a breach of employment obligations. In addition, specialized training is mandatory for IC members and senior leadership to ensure fair, sensitive, and legally sound handling of complaints, while reinforcing leadership's role in modelling respectful workplace conduct.

❖ INDEMNIFICATION

Any person committing acts of a sexual nature or indulging in acts of sexual harassment, hereby undertakes to indemnify and hold harmless 3C IT, its management, IC and affiliates from and against any loss, claim, penalty, legal liability, cost, or damage (whether present, future, or contingent) arising out of or in connection with any breach of this Policy, POSH Act and its Rules, including but not limited to breaches of confidentiality, false complaints made with malicious intent, non-compliance with IC recommendations, or any unlawful conduct under the policy. This indemnity shall also apply in cases where 3C IT is made to bear any fine, penalty, or legal consequence due to the employee's actions or omissions in violation of this policy.

❖ CLOSING STATEMENT

At 3C IT, we believe that a truly safe and inclusive environment is not just created through policies and procedures, but creating and sustaining such a culture is a shared responsibility - one that transcends roles, titles, and hierarchies. We call upon every employee and each person associated with 3C IT to uphold this commitment, not just in compliance, but in spirit. Together, let us continue to shape 3C IT into a workplace where everyone feels safe, respected, valued, and empowered to contribute and thrive free from fear, bias, or prejudice.

Regards,

Team 3C IT SOLUTIONS & TELECOMS (INDIA) LIMITED.

²¹ Rule 13 of POSH Rules, 2013.

ANNEXURES

ANNEXURE A

Details of IC in Tenure for the year 2026

Sr. No.	Name	Committee Designation	Department	Contact details
1	Gangarani Mayengbam	Presiding Officer	Admin-Director	8605018792
2	Mayuri Mahadik	Member	Key Accounts Manager	9209189167
3	Ashwini Patil	Member	Sr. Tender Executive	9923921155
4	Pakasana Thounaojam	Member	Head-Human Resources	7057476707
5	Adv. Prem Shankar Jha	External Member	External Member	9922382177
