

Prevention of Sexual Harassment (POSH) Policy

Version 1.0 · Effective 21 October 2026

Purpose and scope

TrackMy Tech Private Limited (“the Company”) is committed to a workplace where everyone is treated with dignity and respect and is free from sexual harassment. This policy sets out how the Company prevents, prohibits and redresses sexual harassment, in line with the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (“the Act”) and the rules made under it (“the Rules”).

Who is covered. This policy applies to everyone who works with or for the Company, including directors, employees, consultants, contractors and, expressly, **interns and trainees, whether paid or unpaid, and whether remote, on-site or hybrid**. Under section 2(f) of the Act, an intern or trainee is an “employee” and has full protection under the Act. The policy also applies to conduct by or towards clients, vendors, visitors and others with whom the Company deals.

Our stance on everyone. The Act protects women. The Company goes further: it does not tolerate sexual harassment of anyone, regardless of gender, gender identity or sexual orientation. Complaints by women follow the statutory process in clauses 4 to 8. Complaints by anyone else follow the process in clause 9, which mirrors the statutory process as closely as possible.

This policy should be read with the Intern Code of Conduct, the Internship Policy and Terms of Engagement and the IT, Device and Acceptable Use Policy.

1. What is sexual harassment

1.1 Sexual harassment includes any one or more of the following unwelcome acts or behaviour, whether directly or by implication:

- (a) physical contact and advances;
- (b) a demand or request for sexual favours;
- (c) making sexually coloured remarks;
- (d) showing pornography; or
- (e) any other unwelcome physical, verbal or non-verbal conduct of a sexual nature.

1.2 The following circumstances, if connected with any such act, may also amount to sexual harassment:

- (a) an implied or explicit promise of preferential treatment (for example, a better project, a stipend, a full-time offer or a good certificate);
- (b) an implied or explicit threat of detrimental treatment (for example, a poor review or an early end to the internship);
- (c) an implied or explicit threat about present or future employment status;
- (d) interference with work, or creating an intimidating, offensive or hostile work environment; or
- (e) humiliating treatment likely to affect health or safety.

1.3 **Online conduct counts.** Sexual harassment can happen over chat, email, video calls, social media, code comments, shared documents or any other digital channel. For remote and hybrid interns, these are part of the workplace.

1.4 What matters is the effect of the behaviour on the person receiving it, not the intention behind it.

2. What is the workplace

2.1 “Workplace” includes the Company’s office at the VISTAS Incubation Centre, any client site, any place visited during or because of work (including travel and transport provided by the Company), off-site events and team outings, and any place from which work is done remotely, including a home, together with all online platforms used for work.

3. Prevention: what the Company will do

3.1 The Company will:

- (a) make this policy available to every intern and employee at onboarding, and as part of online offer signing;
- (b) display the details of the Internal Committee or the Local Committee, as applicable, and the consequences of sexual harassment at the office and on its internal channels;
- (c) hold awareness sessions, including for interns, at least once a year;
- (d) give the Committee the facilities it needs to deal with complaints and conduct inquiries;
- (e) help the aggrieved person file a criminal complaint if they choose to; and
- (f) treat sexual harassment as misconduct under its disciplinary rules.

4. Which committee handles complaints

4.1 **Internal Committee.** Where the Company has ten or more employees (interns and trainees are counted as employees), it constitutes an Internal Committee (“IC”) under section 4 of the Act. The names and contact details of the IC members are published on the office notice board and on the Company intranet.

4.2 The IC is made up of a Presiding Officer who is a senior woman employee, at least two employee members, and one external member from a non-governmental organisation or a person familiar with issues relating to sexual harassment. At least half of the IC members are women, and members serve for a term of not more than three years. A member who is a party to, or has a conflict of interest in, a complaint will step aside from it.

4.3 **Local Committee.** Until the Company constitutes an IC, complaints by women are made to the Local Committee constituted under section 6 of the Act by the District Officer for Chengalpattu district, Tamil Nadu.

4.4 **SHe-Box.** A complaint may also be filed online through the Government of India's SHe-Box portal, which forwards it to the appropriate committee.

4.5 **Support from the Company.** The Company will support the aggrieved person in reaching the appropriate committee and will cooperate fully with it. For help and support at any stage, contact admin@trackmytech.in.

4.6 In this policy, "the Committee" means the IC where one has been constituted, and otherwise the Local Committee.

5. How to make a complaint

5.1 **Who can complain.** Any woman who has experienced sexual harassment at the workplace (the "aggrieved woman") may complain. If she cannot complain because of physical or mental incapacity or death, or otherwise, a relative, friend, co-worker, legal heir or another person as allowed by the Rules may complain on her behalf.

5.2 **How.** Send a written complaint to the Committee, by email or on paper. Include, as far as possible, what happened, when and where, who was involved, any witnesses, and any evidence such as messages or screenshots. Six copies are required under the Rules for a paper complaint; the Committee can help with this. If you cannot write the complaint, any member of the Committee will help you put it in writing.

5.3 **When.** A complaint should be made within **3 months** of the incident, or of the last incident if there was a series. The Committee may extend this by a further 3 months if it is satisfied that circumstances prevented earlier filing.

5.4 **Informal help.** You may talk to the Presiding Officer or any member of the Committee informally first, or contact admin@trackmytech.in for support. Doing so does not commit you to filing a formal complaint.

6. What happens after a complaint

6.1 **Conciliation (optional).** Before inquiry, and only if the aggrieved woman asks for it, the Committee may try to settle the matter through conciliation. No monetary settlement may be the basis of conciliation. If a settlement is reached, no further inquiry is held, unless its terms are not complied with.

6.2 **Inquiry.** If there is no conciliation, the Committee will inquire into the complaint following the principles of natural justice:

(a) the Committee sends a copy of the complaint to the respondent within **7 working days** of receiving it;

- (b) the respondent replies, with documents and names of witnesses, within **10 working days** of receiving it;
- (c) both sides are given a fair hearing; legal practitioners may not represent either side at the inquiry; and
- (d) the Committee completes the inquiry within **90 days**.

6.3 Interim relief. During the inquiry, on the written request of the aggrieved woman, the Committee may recommend that the Company transfer either party, grant the aggrieved woman leave of up to 3 months (in addition to other leave), restrain the respondent from reporting on or assessing her work, or take other steps provided in the Rules. For interns, this may include changing supervisor, team or work mode (for example, remote instead of on-site).

6.4 Report and action. The Committee gives its findings to the Company and both parties within **10 days** of completing the inquiry. The Company acts on the recommendations within **60 days** of receiving them.

6.5 Outcomes. If the allegation is proved, action may include a written apology, warning, reprimand, withholding of promotion or increments, termination of internship or employment, counselling, community service, deduction from salary or stipend to compensate the aggrieved woman as determined under section 15 of the Act, and any other action under the Company's rules.

6.6 Appeal. Either party may appeal against the Committee's recommendations to the appellate authority provided for under section 18 of the Act and the Rules, within **90 days** of the recommendations.

7. False or malicious complaints

7.1 If the Committee finds that a complaint was knowingly false or malicious, or that evidence was forged or a witness misled, it may recommend action against the person responsible. Failing to prove a complaint, or not having enough evidence, is **not** by itself a false or malicious complaint. People should never be discouraged from complaining in good faith.

8. Confidentiality and no retaliation

8.1 Confidentiality. The contents of a complaint, the identities and addresses of the aggrieved woman, respondent and witnesses, information about conciliation and inquiry, and the recommendations and action taken must not be published or made known to the public, press or media in any way, as required by section 16 of the Act. Information about the justice secured may be shared without disclosing names or identifying details. Breach of confidentiality is misconduct and may attract a penalty under the Rules.

8.2 No retaliation. The Company will not tolerate any retaliation, victimisation or adverse treatment against anyone who makes a complaint in good faith, helps someone else complain, acts as a witness, or serves on a committee. For interns, this includes any threat or action affecting their stipend, assignments, certificate, reference or future offer. Retaliation is serious misconduct and will be dealt with under this policy and the Intern Code of Conduct.

8.3 Criminal complaint. Nothing in this policy stops any person from filing a police complaint. If the conduct amounts to an offence, the Company will help the aggrieved person file a complaint if they wish.

9. Complaints by anyone other than a woman

9.1 The Company does not tolerate sexual harassment of men, transgender persons, non-binary persons or anyone else. Because the Act's statutory process applies only to complaints by women, these complaints will be handled under the Company's own disciplinary process as follows:

- (a) the complaint is made to the IC where one has been constituted, or otherwise by email to admin@trackmytech.in, in which case the Company will set up a panel of at least three people, including at least one person from outside the Company where practicable;
- (b) the IC or panel follows the same steps, timelines, confidentiality rules and no-retaliation protections as in clauses 5 to 8, as far as they can apply; and
- (c) the outcomes are those in clause 6.5, applied under the Company's disciplinary rules.

10. Records and reporting

10.1 The IC (where constituted) prepares an annual report and submits it to the Company and the District Officer. The Company includes the number of cases and their disposal in its annual report or otherwise informs the District Officer, as required by sections 21 and 22 of the Act.

11. Review

11.1 The Company will review this policy at least once a year, and whenever the law or the number of employees changes (for example, when the Company reaches ten employees and constitutes an IC).

Acknowledgement

By accepting your offer online, you confirm that you have read, understood and agree to this Prevention of Sexual Harassment (POSH) Policy.