

PREVENTION OF SEXUAL HARASSMENT (POSH) & SAFE WORKPLACE POLICY

Praktireva Saranam Foundation

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Approved By: Board of Directors, Praktireva Saranam Foundation

Policy Owner: Praktireva Saranam Foundation

Review Frequency: At least once every two years or earlier, if required by law or organisational circumstances.

1. PURPOSE AND COMMITMENT

Praktireva Saranam Foundation ("the Foundation") is committed to maintaining a safe, respectful, inclusive and professional environment for everyone who participates in, works with, or comes into contact with the Foundation.

The Foundation does not tolerate sexual harassment, sexual misconduct, harassment, intimidation, retaliation, discrimination, bullying, abuse of authority, or other inappropriate conduct in connection with its activities.

This Policy establishes the Foundation's framework for:

- preventing sexual harassment and inappropriate conduct;
- promoting dignity, respect and professional behaviour;
- providing appropriate mechanisms for raising concerns and complaints;
- ensuring that complaints are handled fairly, sensitively and, to the extent required by law and this Policy, confidentially;
- protecting individuals from retaliation for raising concerns in good faith or participating in a complaint process;
- establishing the role and responsibilities of the Internal Complaints Committee ("ICC") where applicable; and
- promoting awareness of expected standards of conduct.

The Foundation will take reasonable and appropriate steps to prevent sexual harassment and to respond to complaints in accordance with applicable law, including the **Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 ("POSH Act")**, wherever applicable.

The Foundation also seeks to maintain a broader safe and respectful environment beyond the minimum statutory requirements of the POSH Act.

2. SCOPE OF THE POLICY

This Policy applies to conduct connected with the Foundation's work, activities, programmes, events, communications or operations.

It is intended to cover, as appropriate to the circumstances:

- Employees and staff members;
- Volunteers;
- Interns and trainees;
- Consultants and professional associates;
- Directors and Board members;
- School partners, teachers and school representatives;
- Beneficiaries and community members participating in Foundation activities;
- Vendors, service providers and other persons engaged with the Foundation; and
- Visitors or other persons who come into contact with the Foundation in connection with its activities.

The Foundation's safe-workplace and conduct standards may apply to interactions between any of the above persons where the conduct is connected with the Foundation.

2.1 Work-Related Environments

For the purposes of this Policy, relevant work-related environments may include, depending on the circumstances:

- Foundation offices or meeting locations;
- School premises where Foundation activities are conducted;
- Plantation drives and environmental programmes;
- Community activities and field visits;
- Training sessions, workshops and awareness programmes;
- Foundation-organised events and meetings;
- Travel undertaken in connection with Foundation activities;
- Accommodation or other arrangements connected with Foundation activities;
- Online meetings and virtual events;
- Official WhatsApp groups, email communications and other digital platforms used for Foundation work; and
- Other locations or situations where individuals are interacting in connection with the Foundation.

The POSH Act contains a statutory definition of "workplace" that extends beyond a conventional office environment.

2.2 Relationship with the POSH Act

Where the POSH Act applies, complaints falling within its statutory scope will be dealt with in accordance with the requirements of that Act and applicable rules.

This Policy does not restrict or reduce any rights or remedies available to an individual under applicable law.

Where conduct falls outside the statutory scope of the POSH Act but nevertheless violates the Foundation's standards of conduct, the Foundation may address the matter under its broader organisational policies and procedures, as appropriate.

3. LEGAL AND POLICY FRAMEWORK

This Policy is guided primarily by the following legal and organisational framework:

3.1 Applicable Law

The Foundation will comply with applicable provisions of the:

Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013

and the rules made under the Act, as applicable.

The POSH Act establishes a framework for prevention and redressal of sexual harassment at the workplace and provides for Internal Committees, complaint procedures, inquiry mechanisms and duties of employers.

3.2 Internal Complaints Committee

Where the statutory requirements for constitution of an Internal Committee apply, the Foundation will constitute and maintain the Committee in accordance with applicable law.

The POSH Act specifies requirements concerning the composition of the Internal Committee, including a woman Presiding Officer, employee members and an external member, with at least one-half of the nominated members being women.

The Foundation will ensure that the Committee is provided with the facilities reasonably necessary for dealing with complaints and conducting inquiries, as required by applicable law.

3.3 Broader Organisational Standards

In addition to the statutory POSH framework, the Foundation expects all persons covered by this Policy to maintain standards of:

- dignity and respect;

- professional conduct;
- appropriate communication;
- non-discrimination;
- non-intimidation;
- non-retaliation; and
- responsible behaviour during Foundation activities.

The Foundation may take appropriate organisational action where conduct violates these standards, even where the conduct does not fall within the statutory definition of sexual harassment under the POSH Act.

3.4 No Restriction on Legal Remedies

Nothing in this Policy prevents an individual from exercising any right or seeking any remedy available under applicable law.

Where a matter may also constitute a criminal offence or otherwise require intervention by a competent authority, the Foundation will not treat this Policy as a substitute for legal remedies or statutory reporting obligations.

4. DEFINITIONS AND KEY TERMS

For the purpose of this Policy, the following terms shall have the meanings set out below. Where a term has a specific meaning under applicable law, including the POSH Act, the statutory meaning shall prevail to the extent applicable.

4.1 Sexual Harassment

“Sexual harassment” includes any unwelcome act or behaviour of a sexual nature, whether expressed directly or indirectly.

This may include, among other conduct:

- unwelcome physical contact or advances;
- a demand or request for sexual favours;
- sexually coloured remarks;
- showing or sharing pornography or sexually explicit material;
- any other unwelcome physical, verbal or non-verbal conduct of a sexual nature.

The determination of whether conduct constitutes sexual harassment will be made based on the facts and circumstances of the matter and the applicable legal framework.

4.2 Aggrieved Woman

For matters falling within the statutory scope of the POSH Act, an “aggrieved woman” means a woman, of any age and whether employed or not, who alleges that she has been subjected to sexual harassment at a workplace.

The statutory definition will apply to complaints handled under the POSH Act.

4.3 Complainant

“Complainant” means a person who submits a complaint or raises a concern under this Policy.

Where the complaint is being handled under the POSH Act, the applicable statutory terminology and requirements will apply.

4.4 Respondent

“Respondent” means the person against whom a complaint or allegation has been made.

A respondent shall be treated fairly and shall have an opportunity to respond to allegations in accordance with the applicable procedure.

4.5 Internal Complaints Committee (ICC)

“Internal Complaints Committee” or “ICC” means the committee constituted by the Foundation in accordance with applicable law for receiving and dealing with complaints of sexual harassment falling within the statutory scope of the POSH Act.

The ICC shall perform its functions independently and in accordance with applicable legal requirements and this Policy.

4.6 Workplace

“Workplace” shall have the meaning assigned under applicable law.

For the Foundation’s organisational purposes, work-related environments may also include Foundation activities, field visits, plantation drives, school programmes, meetings, events, travel, online meetings and official digital communication platforms, as applicable to the circumstances.

4.7 Unwelcome Conduct

Conduct may be considered unwelcome where it is not desired, invited or consented to by the person experiencing it.

The absence of an immediate objection does not by itself establish that conduct was welcomed.

4.8 Retaliation

“Retaliation” means adverse, threatening, intimidating or punitive conduct directed towards a person because they:

- raised a concern or complaint in good faith;

- participated in an inquiry or investigation;
- provided information or evidence;
- acted as a witness; or
- otherwise assisted in the complaint process.

Retaliation is prohibited under this Policy.

4.9 Confidential Information

“Confidential Information” includes information relating to a complaint, the identity of the complainant, respondent and witnesses, statements, evidence, inquiry proceedings, recommendations and other information that is required to be kept confidential under applicable law.

Such information shall only be disclosed to persons who are authorised or legally entitled to receive it.

4.10 Good-Faith Complaint

A “good-faith complaint” is a complaint made honestly and without knowingly providing false information or intentionally misleading the Foundation or the ICC.

A complaint that cannot ultimately be substantiated shall **not, by itself, be treated as a false or malicious complaint.**

4.11 Foundation

“Foundation” means **Praktireva Saranam Foundation**, including its authorised representatives, programmes, activities and associated operations.

4.12 Policy

“Policy” means this **Prevention of Sexual Harassment (POSH) & Safe Workplace Policy** of Praktireva Saranam Foundation, as amended from time to time in accordance with applicable law and the Foundation’s governance procedures.

5. WHAT CONSTITUTES SEXUAL HARASSMENT

The Foundation recognises that sexual harassment may occur through physical, verbal, non-verbal, written, visual or digital conduct. Conduct may constitute sexual harassment where it is unwelcome and falls within the applicable legal definition.

Under the POSH Act, sexual harassment includes one or more unwelcome acts or behaviour of a sexual nature, whether directly or by implication. These include physical contact and advances, demands or requests for sexual favours, sexually coloured remarks,

showing pornography, and other unwelcome physical, verbal or non-verbal conduct of a sexual nature.

5.1 Examples of Prohibited Conduct

Depending on the facts and circumstances, prohibited conduct may include:

- Unwelcome physical contact, touching or advances of a sexual nature.
- Unwanted requests or demands for sexual favours.
- Sexually coloured jokes, comments, remarks or conversations.
- Unwanted comments about a person's body, appearance, clothing or sexual life.
- Sharing, displaying or sending pornographic or sexually explicit material.
- Unwanted sexual messages, images, videos, voice messages, emails or other communications.
- Unwelcome sexual advances through social media, messaging applications or other digital platforms used in connection with Foundation activities.
- Repeated unwanted requests for dates, romantic involvement or sexual interaction after a person has indicated that such attention is unwelcome.
- Sexual gestures, staring, suggestive expressions or other unwelcome non-verbal conduct of a sexual nature.
- Any other unwelcome physical, verbal or non-verbal conduct of a sexual nature covered by applicable law.

5.2 Circumstances That May Also Amount to Sexual Harassment

Under the POSH Act, circumstances connected with an act or behaviour of sexual harassment may also be relevant, including:

- An implied or explicit promise of preferential treatment in employment.
- An implied or explicit threat of detrimental treatment in employment.
- An implied or explicit threat concerning present or future employment status.
- Interference with work or creation of an intimidating, offensive or hostile work environment.
- Humiliating treatment that may affect a person's health or safety.

5.3 Foundation Activities and Field Situations

The Foundation recognises that its work may take place outside a conventional office environment.

Accordingly, inappropriate conduct connected with Foundation activities may be addressed under this Policy when it occurs during or in connection with activities such as:

- School plantation drives;
- Environmental education programmes;
- Community activities;
- Field visits and site surveys;
- Foundation meetings and events;

- Training and awareness sessions;
- Foundation-related travel;
- Online meetings;
- Official communication groups; or
- Other Foundation-related interactions.

The POSH Act's definition of workplace includes certain places visited during the course of employment and transportation provided for such journeys.

5.4 Consent and Personal Boundaries

Everyone associated with the Foundation is expected to respect personal boundaries.

A person's participation in a Foundation activity, professional relationship, friendship, prior interaction or communication does not by itself constitute consent to sexual or other unwelcome conduct.

Individuals should respect a clear request to stop unwanted communication, contact or behaviour.

5.5 Other Harassment and Inappropriate Conduct

The Foundation's commitment to a safe and respectful environment extends beyond sexual harassment.

Conduct such as bullying, intimidation, discriminatory behaviour, abusive use of authority, threats, serious verbal abuse, retaliation or other inappropriate conduct may also be addressed under the Foundation's broader organisational standards, even where the conduct does not fall within the statutory definition of sexual harassment.

5.6 Assessment of Complaints

No single example in this section should be interpreted as automatically determining the outcome of a complaint.

Each complaint will be considered based on the facts and circumstances, the information and evidence available, the applicable law, and principles of fairness and natural justice.

COMPLAINT AND REDRESSAL PROCEDURE

6.1 Purpose

Praktireva Saranam Foundation is committed to providing a safe, respectful and harassment-free environment. Any person who experiences or witnesses sexual harassment or other prohibited conduct covered under this Policy may report the concern through the Foundation's designated complaint mechanism.

The Foundation will handle complaints fairly, sensitively and, to the extent permitted by law, confidentially.

6.2 How to Submit a Complaint

A person covered by this Policy may report a concern or complaint through the Foundation's designated reporting mechanism, including the Foundation's online ICC/Workplace Complaint Form.

ICC/Workplace Complaint Form:

<https://forms.gle/EAKSLK6V9bggvWeg7>

The online form provides an accessible channel for submitting information relating to a concern or complaint. Submission through the form does not, by itself, determine the statutory or organisational procedure applicable to the matter.

Where a complaint falls within the statutory scope of the POSH Act, the Foundation shall ensure that it is dealt with through the appropriate statutory mechanism in accordance with applicable law.

A complaint or concern may also be communicated through another authorised reporting channel made available by the Foundation.

Where reasonably possible, the person making a complaint should provide relevant details such as:

- Date and approximate time of the incident;
- Location or context in which it occurred;
- Description of the conduct or concern;
- Name of the person against whom the complaint is made, if known;
- Names of witnesses, if any;
- Relevant documents or other supporting material, if available; and
- Any immediate safety or support concerns.

A person should not delay reporting solely because they do not have complete evidence or all the requested information.

6.3 Statutory POSH Complaints

Where a complaint falls within the scope of the **Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013**, the complaint shall be dealt with in accordance with the applicable provisions of the Act and Rules.

Under the Act, a complaint of sexual harassment should ordinarily be made in writing within **three months from the date of the incident**, or, in the case of a series of incidents, within three months from the date of the last incident. The applicable Committee may extend this period by a further period of up to three months where permitted by law and where reasons are recorded in writing.

6.4 Initial Review

Upon receiving a complaint or concern, the Foundation shall ensure that it is reviewed by the appropriate authorised person, committee or statutory mechanism, as applicable.

The initial review may include:

1. Acknowledging receipt of the complaint, where appropriate.
2. Reviewing the information provided and determining the appropriate process.
3. Assessing whether any immediate safety or protection measures are required.
4. Maintaining appropriate confidentiality of the complaint and related information.
5. Contacting the complainant for clarification or additional information where necessary.
6. Determining the next appropriate step in accordance with applicable law and this Policy.

Submission of a complaint does not by itself establish that the alleged conduct has occurred. The matter shall be assessed through a fair and appropriate process.

Where the complaint falls within the statutory scope of the POSH Act, the applicable statutory mechanism shall be followed.

6.5 Inquiry

Where a formal inquiry is required under the POSH Act, the ICC shall conduct the inquiry in accordance with the applicable statutory procedure.

The ICC shall provide the concerned parties a reasonable opportunity to present their respective information and respond to the matters relevant to the complaint.

The inquiry under the POSH Act is required to be completed within **90 days**.

The ICC may consider relevant documents, communications, records, witness statements and other material that may assist in determining the facts of the matter.

6.6 Interim Protection and Support

Where appropriate and permitted by applicable law, the Foundation may take reasonable interim measures to protect the complainant or other persons involved in the complaint from further harassment, retaliation or undue interference during the review or inquiry.

Any such measure shall not be treated as a finding that the allegations have been established.

6.7 Inquiry Report and Action

Upon completion of a statutory inquiry, the ICC shall prepare its findings and recommendations in accordance with applicable law.

Under the POSH Act, the ICC is required to provide its inquiry report to the employer/District Officer within **10 days of completion of the inquiry**, and the report is to be made available to the concerned parties as provided by law. The employer is required to act upon the recommendations within **60 days** of receiving them.

Where allegations are established, appropriate action may be taken in accordance with applicable law, this Policy and the Foundation's applicable rules or procedures.

6.8 Malicious or False Complaints

The Foundation recognises that a complaint may sometimes not be substantiated. **Failure to substantiate an allegation does not, by itself, mean that the complaint was false or malicious.**

Where an inquiry establishes that a complaint was knowingly false, malicious, or supported by forged or misleading evidence, appropriate action may be considered in accordance with applicable law.

Any such determination shall be made only after following the appropriate process.

6.9 Confidentiality

All persons involved in handling a complaint, including ICC members, complainants, respondents and witnesses, are expected to maintain confidentiality.

The identity and details of the complainant, respondent and witnesses, as well as information relating to the complaint, inquiry and recommendations, shall not be disclosed or published except where disclosure is permitted or required by applicable law.

The POSH Act specifically restricts publication or communication of such information.

6.10 Protection Against Retaliation

Prakrtireva Saranam Foundation does not tolerate retaliation, intimidation, threats or adverse treatment against a person for:

- Making a complaint in good faith;
- Participating in an inquiry;
- Providing information or evidence;
- Acting as a witness; or
- Seeking assistance under this Policy.

Any concern regarding retaliation may be reported to the authorised ICC or Foundation management and may be addressed separately.

6.11 Appeal

Where an appeal is available under the POSH Act or other applicable law, the concerned person may exercise the applicable legal remedy within the prescribed period.

Under the POSH Act, an appeal may generally be preferred within **90 days** of the relevant recommendation/order, subject to the applicable legal provisions.

7. INTERNAL COMPLAINTS COMMITTEE (ICC)

Praktireva Saranam Foundation shall maintain an Internal Complaints Committee (“ICC”) in accordance with the requirements of the POSH Act, wherever the statutory provisions relating to constitution of an Internal Committee apply.

The ICC shall serve as the designated body for receiving and dealing with complaints of sexual harassment falling within the statutory scope of the POSH Act.

7.1 Constitution of the ICC

Where the statutory provisions of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (“POSH Act”) require constitution of an Internal Committee, the Foundation shall take appropriate steps to comply with the applicable statutory requirements.

The constitution, composition, appointment, tenure and functioning of the Internal Committee shall be governed by the POSH Act and the applicable Rules, as amended from time to time.

The Foundation shall maintain appropriate written documentation relating to the constitution and appointment of the Committee where such statutory requirements apply.

Where a statutory Internal Committee is not required or cannot be constituted in the manner prescribed by law, the Foundation shall follow the applicable statutory mechanism, including the Local Committee mechanism where applicable, and shall maintain its broader internal safe-workplace and reporting mechanism in accordance with this Policy.

The Foundation shall not represent any internal reporting or grievance mechanism as a statutory Internal Committee unless it has been formally constituted in accordance with applicable law.

7.2 Tenure

The Presiding Officer and ICC members shall hold office for the period specified in their appointment order, subject to the maximum period permitted under applicable law.

Under the POSH Act, the term of the Presiding Officer and every ICC member shall not exceed **three years** from the date of nomination.

7.3 Responsibilities of the ICC

The ICC shall, as applicable:

- Receive complaints of sexual harassment;
- Assess complaints and determine the appropriate statutory process;
- Conduct inquiries in accordance with applicable law;
- Provide the concerned parties a fair opportunity to present relevant information;
- Maintain appropriate confidentiality;
- Consider relevant evidence and witness information;
- Recommend appropriate action where allegations are established;
- Recommend interim measures where permitted and appropriate;
- Maintain appropriate records of complaints and proceedings;
- Support awareness and prevention initiatives; and
- Perform such other functions as may be required under applicable law.

7.4 Independence and Conflict of Interest

ICC members shall perform their responsibilities impartially and without undue influence.

An ICC member who has a personal, professional or other conflict of interest in a particular matter should disclose the conflict and, where appropriate, recuse themselves from handling that matter in accordance with applicable law and the Foundation's procedures.

No person involved in a complaint should attempt to improperly influence the ICC or interfere with its proceedings.

7.5 Fairness and Natural Justice

The ICC shall conduct proceedings fairly and in accordance with the principles of natural justice.

The complainant and respondent shall be given an appropriate opportunity to present relevant information and respond to matters raised during the inquiry, subject to the requirements and limitations of applicable law.

7.6 Facilities and Support

The Foundation shall provide the ICC with reasonable facilities and support necessary for performing its functions.

This may include access to relevant records, communication facilities, meeting arrangements and other reasonable administrative support required for handling complaints and conducting inquiries.

7.7 ICC Members and Contact Details

The Foundation shall maintain an updated record of the constitution of its ICC, including the names and roles of the members and appropriate contact information.

Where required or appropriate under applicable law, the constitution of the ICC shall be communicated or displayed through the Foundation's website, office, notices or other suitable means.

Current ICC Members:

To be inserted after the Foundation formally finalises/appoints the ICC.

ICC Reporting Channel:

The Foundation's designated **ICC Complaint Form** may be used to submit a complaint or concern.

8. DUTIES AND RESPONSIBILITIES OF THE FOUNDATION

Praktireva Saranam Foundation ("the Foundation") shall take reasonable and appropriate steps to prevent sexual harassment, promote a safe working environment and support the effective implementation of this Policy.

Where the POSH Act applies, the Foundation shall comply with the duties imposed on an employer under applicable law. Section 19 of the POSH Act sets out specific duties including providing a safe working environment, conducting awareness programmes, supporting the Internal Committee, assisting with inquiries and monitoring timely submission of reports.

8.1 Safe and Respectful Environment

The Foundation shall make reasonable efforts to provide a safe environment for persons participating in its work and activities.

This includes taking appropriate preventive measures against sexual harassment and responding appropriately when concerns are brought to the Foundation's attention.

8.2 Awareness and Sensitisation

The Foundation shall promote awareness of:

- The standards of behaviour expected under this Policy;
- The prohibition of sexual harassment;
- Available complaint and reporting mechanisms;
- The role of the ICC, where applicable;
- Confidentiality requirements; and

- Protection against retaliation.

Where required under the POSH Act, the Foundation shall organise appropriate awareness programmes and orientation for ICC members.

8.3 Support to the ICC

The Foundation shall provide the ICC with reasonable administrative and operational support necessary for handling complaints and conducting inquiries.

This may include:

- Appropriate meeting arrangements;
- Access to relevant organisational information;
- Assistance in communicating with relevant persons;
- Reasonable facilities required for inquiry proceedings; and
- Other support required under applicable law.

8.4 Cooperation During Inquiry

Persons associated with the Foundation are expected to cooperate with a lawful inquiry and provide relevant information when appropriately requested.

The Foundation shall, where required and legally permissible, assist the ICC in securing the participation of relevant persons and accessing information necessary for the inquiry.

8.5 Protection Against Retaliation

The Foundation shall not tolerate retaliation, intimidation or adverse treatment directed against a person for making a complaint in good faith, participating in an inquiry, providing relevant information or otherwise assisting in the complaint process.

Any such concern may itself be reported and may be addressed appropriately.

8.6 Appropriate Action

Where sexual harassment or other prohibited conduct is established through the applicable process, the Foundation shall take appropriate action in accordance with applicable law, this Policy and the Foundation's applicable rules.

Where conduct may constitute an offence under other applicable law, the Foundation shall provide appropriate assistance and take such steps as may be required or permitted by law.

8.7 Records and Reporting

The Foundation shall maintain appropriate records relating to complaints, inquiries, actions and other matters required under applicable law.

Where statutory reporting requirements apply, the Foundation shall ensure that the relevant reports are prepared and submitted within the prescribed timelines.

The POSH Act specifically provides for annual reporting by the Internal Committee and corresponding information to be included by the employer in its annual report, where applicable.

8.8 Public Information

The Foundation shall make relevant information about its POSH framework and complaint mechanism reasonably accessible to persons covered by this Policy.

Where required under applicable law, information concerning the ICC and the order constituting the Committee shall be made available through appropriate channels, including the Foundation's website.

8.9 Continuous Improvement

The Foundation shall periodically review this Policy and its implementation to ensure that its procedures remain appropriate, effective and aligned with applicable legal requirements.

9. PREVENTION, AWARENESS AND TRAINING

Praktireva Saranam Foundation recognises that prevention and awareness are essential to maintaining a safe, respectful and inclusive environment.

The Foundation shall take reasonable steps to promote awareness of this Policy, expected standards of conduct and available reporting mechanisms.

Where the POSH Act applies, the Foundation shall comply with the statutory requirements relating to awareness programmes and orientation of Internal Committee members. Section 19(c) specifically requires employers to organise regular workshops and awareness programmes and orientation programmes for Internal Committee members in the prescribed manner.

9.1 Policy Awareness

The Foundation shall make this Policy reasonably accessible to persons covered by it.

Awareness may be provided through:

- The Foundation's website;
- Volunteer onboarding and orientation;
- Internal communication channels;
- Training sessions and workshops;
- Policy acknowledgements;
- Awareness materials; and
- Other appropriate communication methods.

9.2 Volunteer and Team Orientation

Persons joining or working with the Foundation may be informed about:

- The Foundation's commitment to a safe and respectful environment;
- Prohibited conduct under this Policy;
- Appropriate professional boundaries;
- The Foundation's ICC and complaint mechanism;

- How and where a complaint or concern may be submitted;
- Confidentiality requirements; and
- Protection against retaliation.

Particular attention may be given to volunteers participating in **school visits, plantation drives, field activities, travel, community programmes and other activities involving interaction with external stakeholders.**

9.3 ICC Orientation and Capacity Building

Members of the ICC shall receive appropriate orientation regarding their responsibilities and the applicable legal framework.

Such orientation may include:

- Understanding the POSH Act and applicable Rules;
- Receiving and handling complaints;
- Maintaining confidentiality;
- Principles of natural justice and fair inquiry;
- Avoiding conflicts of interest;
- Handling evidence and witness information;
- Appropriate communication with complainants and respondents;
- Protection against retaliation; and
- Documentation and reporting requirements.

9.4 Awareness of Reporting Mechanism

The Foundation shall ensure that persons covered by this Policy are made reasonably aware of the available complaint mechanism.

The Foundation's designated **ICC Complaint Form** may be used to submit a complaint or concern.

The reporting mechanism shall be communicated through appropriate channels, including the Foundation website and volunteer/team communications.

9.5 Prevention Through Responsible Conduct

All persons covered by this Policy are expected to contribute to prevention by:

- Respecting personal and professional boundaries;
- Avoiding unwelcome sexual or inappropriate conduct;
- Maintaining appropriate communication;
- Respecting confidentiality;
- Not tolerating or encouraging harassment;
- Raising concerns through appropriate channels where necessary; and
- Cooperating with authorised complaint-handling processes.

9.6 Review of Awareness Measures

The Foundation may periodically review its awareness and training activities to determine whether additional orientation, communication or training is required.

The Foundation shall update its awareness and training measures when there are significant changes in applicable law, organisational activities or identified risks.

9.7 Documentation

Where awareness sessions, training or orientation programmes are conducted, the Foundation may maintain appropriate records such as:

- Date of the programme;
- Subject covered;
- Participants;
- Trainer/facilitator details; and
- Relevant supporting material.

Such records shall be maintained in accordance with applicable law and the Foundation's record-keeping practices.

10. CONFIDENTIALITY, PRIVACY AND PROTECTION OF INFORMATION

Praktireva Saranam Foundation recognises that complaints of sexual harassment may involve highly sensitive personal information. The Foundation is committed to handling such information carefully and limiting access to persons who are authorised or have a legitimate need to know.

Where the POSH Act applies, the confidentiality requirements under the Act shall be followed. Section 16 prohibits publication or communication of the contents of a complaint, identities and addresses of the aggrieved woman, respondent and witnesses, information relating to conciliation and inquiry proceedings, recommendations of the Committee, and action taken under the Act.

10.1 Information Covered by Confidentiality

Confidential information may include:

- The identity and contact details of the complainant;
- The identity and contact details of the respondent;
- The identity of witnesses;
- The contents of the complaint;
- Statements and information provided during an inquiry;
- Documents, photographs, messages, recordings or other evidence;
- Information relating to conciliation, where applicable;
- ICC findings and recommendations; and
- Information concerning action taken in relation to the complaint.

10.2 Access to Complaint Information

Information relating to a complaint shall be accessible only to the ICC, authorised Foundation representatives, legal or professional advisers where appropriately engaged, or other persons where disclosure is required or permitted by applicable law.

The Foundation shall take reasonable steps to prevent unauthorised access, sharing, forwarding, publication or discussion of complaint-related information.

10.3 Confidentiality of the Complaint & Reporting Form

The Foundation's designated **ICC Complaint Form** is intended to collect information required for the appropriate handling and assessment of a complaint.

Access to submitted responses shall be restricted to authorised persons responsible for handling the complaint.

The Foundation shall take reasonable administrative and technical measures to protect information submitted through the form and associated records.

10.4 Communication with the Complainant

The Foundation may communicate with the complainant when necessary to:

- Acknowledge receipt of a complaint;
- Request clarification or additional information;
- Discuss available support or interim measures;
- Communicate relevant procedural information; or
- Provide information required under applicable law.

Communication shall be limited to information reasonably necessary for the relevant purpose.

10.5 Confidentiality by Persons Involved in the Process

ICC members, Foundation representatives, witnesses and other persons who receive confidential information in connection with a complaint shall be expected to maintain confidentiality and shall not share such information with unauthorised persons.

Unauthorised disclosure may result in appropriate action in accordance with applicable law and the Foundation's applicable policies.

The POSH Act also provides for consequences where a person entrusted with handling a complaint or inquiry contravenes the statutory confidentiality requirements.

10.6 Public Disclosure

The Foundation shall not publish or publicly disclose complaint-related information in a manner that identifies the complainant, respondent or witnesses, except where disclosure is legally permitted or required.

Any public communication concerning a matter, where legally permissible, shall avoid information that could identify the individuals involved.

10.7 Records and Secure Storage

Complaint-related records shall be maintained securely and for the period required under applicable law or the Foundation's record-retention requirements.

Access to physical and electronic records shall be restricted to authorised persons.

The Foundation shall take reasonable measures to prevent accidental loss, unauthorised access, alteration or disclosure of complaint-related information.

10.8 Privacy Does Not Prevent Necessary Legal Disclosure

Confidentiality does not prevent disclosure where such disclosure is:

- Required by applicable law;
- Required by a competent court, authority or statutory body;
- Necessary for carrying out a lawful inquiry or proceeding; or
- Otherwise legally permitted.

Where disclosure is necessary, the Foundation shall seek to limit disclosure to the information reasonably required for the relevant purpose.

10.9 No Promise of Absolute Confidentiality

The Foundation will make reasonable efforts to protect confidentiality, but it shall **not promise absolute confidentiality where disclosure is required by law or necessary for a lawful process.**

Individuals submitting complaints should therefore provide information through the designated reporting mechanism with an understanding that relevant information may need to be shared with authorised persons for proper handling of the matter.

11. NON-RETALIATION, PROTECTION AND SUPPORT

Praktireva Saranam Foundation is committed to ensuring that a person who raises a concern or participates in a complaint process is not subjected to retaliation, intimidation or adverse treatment because of their participation.

Where the POSH Act applies, the Foundation and the ICC shall follow the protections and interim measures available under applicable law. The Act specifically provides for certain interim measures during the pendency of an inquiry, including transfer, leave, or restrictions on interaction where recommended by the ICC.

11.1 Protection Against Retaliation

Retaliation is prohibited against any person who, in good faith:

- Makes or assists with a complaint;
- Provides information or evidence;
- Participates as a witness;
- Cooperates with an ICC inquiry;
- Requests support or protection; or
- Exercises a right available under this Policy or applicable law.

Retaliation may include threats, intimidation, harassment, exclusion, adverse treatment, deliberate interference with Foundation-related activities, or other conduct intended to punish or discourage a person because of their participation in the complaint process.

11.2 Reporting Retaliation

A person who believes they are experiencing retaliation may report the concern to the ICC or another authorised Foundation representative.

Such a concern may be considered separately from the original complaint where appropriate.

11.3 Interim Measures

Where appropriate and legally permissible, the ICC may recommend reasonable interim measures during the pendency of an inquiry to protect the complainant or prevent further harassment or interference.

Depending on the circumstances and applicable law, such measures may include:

- Changes to work or activity arrangements;
- Temporary separation of the persons involved;
- Changes to reporting or supervisory arrangements;
- Leave or other appropriate temporary arrangements;
- Restrictions on direct communication or interaction; or
- Other reasonable protective measures.

Interim measures are precautionary and **shall not be treated as a finding that the allegations have been established.**

11.4 Support to the Complainant

The Foundation shall make reasonable efforts to provide appropriate support and information to a person who raises a concern.

Depending on the circumstances, this may include:

- Explaining the available complaint process;
- Providing information about the ICC;
- Facilitating appropriate communication;
- Considering reasonable safety measures;
- Providing information about external legal or statutory remedies where appropriate; and
- Assisting the individual in accessing appropriate support where reasonably possible.

11.5 Right to Seek External Remedies

Nothing in this Policy prevents an individual from approaching a competent government authority, law-enforcement agency, court, tribunal, Local Committee or other appropriate authority where a legal remedy is available.

The Foundation shall not require an individual to use its internal complaint mechanism as a condition for exercising any statutory or legal right.

11.6 Emergency or Immediate Safety Concerns

If a person believes that there is an immediate threat to their physical safety, they should prioritise their immediate safety and seek appropriate emergency or law-enforcement assistance.

The ICC complaint mechanism is intended for handling complaints under this Policy and applicable POSH procedures; it is **not a substitute for emergency assistance.**

11.7 No Retaliatory Settlement

No person should be pressured, threatened or otherwise improperly influenced to withdraw a genuine complaint or concern.

Where conciliation is legally available under the POSH Act, it shall be undertaken only in accordance with the applicable statutory requirements. The POSH Act specifically provides that **monetary settlement shall not be the basis of conciliation**.

11.8 Fair Treatment of All Parties

Protection against retaliation applies to all persons involved in the complaint process.

At the same time, a complaint shall not automatically be treated as proof of wrongdoing. The complainant and respondent shall be treated fairly, and any statutory inquiry shall follow the applicable procedure and principles of natural justice.

12. CONCILIATION, INQUIRY FINDINGS AND ACTION

The Foundation shall handle complaints in accordance with applicable law, this Policy and principles of fairness and natural justice. Where the POSH Act applies, the statutory procedure under Sections 10–15 shall be followed.

12.1 Conciliation

Where permitted under the POSH Act, the complainant may request conciliation before the ICC proceeds with a formal inquiry.

Conciliation shall be considered only where the complainant makes the request voluntarily. The ICC shall not impose or compel conciliation upon the complainant.

No monetary settlement shall be made the basis of conciliation.

Where a settlement is reached:

- The terms shall be recorded by the ICC.
- The settlement shall be forwarded to the appropriate authority for implementation.
- Copies shall be provided to the concerned parties as required by law.
- No further inquiry shall be conducted into the complaint where the settlement has been duly reached and recorded, subject to the applicable statutory provisions.
- If the complainant informs the ICC that the terms of the settlement have not been complied with, the ICC shall take the steps required under applicable law.

12.2 Formal Inquiry

Where conciliation is not requested, is unsuccessful, or cannot appropriately be used, the ICC shall proceed with an inquiry where required under the POSH Act.

The inquiry shall be conducted fairly and in accordance with applicable law and principles of natural justice.

The concerned parties shall be given an appropriate opportunity to present relevant information, evidence and their respective responses.

The POSH Act requires the inquiry to be completed within **90 days**.

12.3 Evidence and Witnesses

The ICC may consider relevant material including:

- Written statements;
- Documents and records;
- Emails and official communications;
- Messages or other digital communications;
- Photographs, videos or other relevant material;
- Witness statements; and
- Other information relevant to determining the facts.

The ICC shall assess the material available to it in accordance with the applicable legal framework and principles of natural justice.

12.4 Inquiry Findings

At the conclusion of the inquiry, the ICC shall prepare its findings and recommendations in accordance with applicable law.

Where the allegations are **not proved**, the ICC may recommend that no action be taken against the respondent, subject to the applicable statutory framework.

Where the allegations are **proved**, the ICC may recommend appropriate action in accordance with the POSH Act and applicable organisational rules or procedures.

12.5 Inquiry Report

The ICC shall provide its inquiry report to the employer or other appropriate authority within the period prescribed by applicable law.

Under the POSH Act, the report is to be provided within **10 days from completion of the inquiry**, and it is to be made available to the concerned parties as provided by law.

12.6 Corrective and Disciplinary Action

Where allegations are established, the Foundation shall take or implement appropriate action in accordance with the ICC's lawful recommendations, applicable law and the status of the person concerned.

Depending on the circumstances and applicable rules, action may include:

- Written warning or reprimand;
- Removal from a Foundation activity or role;

- Suspension or termination of engagement, where applicable;
- Restriction or withdrawal of responsibilities or access;
- Mandatory counselling, training or sensitisation, where appropriate;
- Other corrective measures permitted by applicable rules; or
- Any other action permitted or required under applicable law.

Where the respondent is a volunteer, consultant, vendor, partner or other non-employee, the Foundation shall take action appropriate to that person's relationship with the Foundation and the circumstances of the matter.

12.7 Compensation

Where applicable under the POSH Act, compensation may be determined in accordance with the statutory framework and relevant factors prescribed by law.

The Foundation shall not independently impose or promise compensation outside the applicable legal process.

12.8 Non-Substantiation Is Not Automatically Misconduct

If an allegation is not proved, this shall not automatically mean that the complainant made a false or malicious complaint.

Action for a false or malicious complaint shall only be considered where the applicable process establishes the circumstances contemplated by law.

12.9 Implementation of Recommendations

The Foundation shall take appropriate steps to implement lawful ICC recommendations within the timelines prescribed by applicable law.

Under the POSH Act, the employer is required to act upon the ICC's recommendations within **60 days** of receiving the recommendation/report, as applicable.

12.10 Right of Appeal

Where an appeal is available under the POSH Act or other applicable law, the concerned person may exercise that right within the prescribed period and in accordance with the applicable procedure.

13. COMPLAINTS INVOLVING EXTERNAL PERSONS AND THIRD PARTIES

Praktireva Saranam Foundation recognises that persons associated with its activities may interact with individuals who are not employees, volunteers or members of the Foundation.

This may include school authorities, teachers, students, community members, partner organisations, vendors, service providers, contractors, visitors and other external stakeholders.

The Foundation will take reasonable steps to maintain a safe environment and respond appropriately to sexual harassment or other prohibited conduct connected with Foundation activities. The POSH Act specifically requires an employer to provide a safe working environment, including safety from persons coming into contact at the workplace.

13.1 External Person as Respondent

Where a complaint concerns an external person who is not an employee or volunteer of the Foundation, the Foundation shall assess the circumstances and determine the appropriate course of action.

Depending on the situation, the Foundation may:

- **Take reasonable steps to protect the complainant or affected person;**
- **Restrict or discontinue the person's participation in Foundation activities;**
- **Restrict access to Foundation activities, premises or programmes where appropriate;**
- **Inform the relevant school, partner organisation, vendor or other responsible authority;**
- **Assist the affected person in accessing appropriate legal or statutory remedies;**
- **Cooperate with competent authorities where required or appropriate; and**
- **Take any other lawful and reasonable action within the Foundation's authority.**

Where the statutory POSH framework applies and the alleged respondent is not an employee, the applicable statutory procedure shall be followed. The POSH Rules provide for inquiry in cases involving a non-employee where the alleged incident occurred at the relevant workplace and the statutory conditions are satisfied.

13.2 Foundation Volunteer or Representative as Respondent

Where a volunteer, director, consultant, representative or other person associated with the Foundation is accused of inappropriate conduct, the Foundation may take appropriate organisational measures in accordance with this Policy, the person's role and applicable law.

Such measures may include temporary restriction from activities while a matter is being considered, where appropriate and lawful.

Any action shall be taken fairly and shall not be treated as a finding of guilt merely because a complaint has been submitted.

13.3 Incidents at Schools and Partner Locations

Because the Foundation conducts activities at schools and other external locations, concerns arising during such activities may involve people who are not part of the Foundation.

The Foundation shall cooperate, where appropriate and legally permissible, with the relevant school or partner organisation while maintaining the confidentiality requirements applicable to the complaint.

Where the incident may constitute an offence under applicable criminal law, the Foundation shall not prevent or discourage the affected person from approaching the appropriate law-enforcement or statutory authority.

13.4 Vendors, Contractors and Service Providers

The Foundation expects vendors, contractors and service providers engaged in connection with Foundation activities to maintain appropriate standards of professional and respectful conduct.

Where a vendor, contractor or service provider is alleged to have engaged in prohibited conduct, the Foundation may review the person's engagement and take appropriate contractual or organisational action, subject to applicable law and the terms of the relevant engagement.

13.5 Partner Organisations

Where a concern involves a person belonging to a partner organisation, the Foundation may coordinate with the relevant organisation to address the matter appropriately, while respecting confidentiality and the rights of the persons involved.

Such coordination shall not prevent an affected person from exercising any independent legal or statutory remedy available to them.

13.6 Children and Other Vulnerable Persons

Where a concern involves a child or another vulnerable person participating in or affected by a Foundation activity, the Foundation shall prioritise their safety and follow applicable child-protection, safeguarding and legal requirements.

Where the circumstances indicate a possible offence against a child or another person requiring mandatory reporting, the Foundation shall follow the applicable legal reporting requirements.

13.7 Limits of Foundation Authority

The Foundation may not have disciplinary authority over an external person who is not engaged by or controlled by the Foundation.

In such cases, the Foundation shall take reasonable steps within its authority and, where appropriate, assist the affected person in identifying the relevant external reporting or legal mechanism.

Nothing in this Policy prevents any person from approaching a competent authority or seeking an independent legal remedy.

14. FALSE OR MALICIOUS COMPLAINTS AND FALSE EVIDENCE

Praktireva Saranam Foundation recognises that complaints under this Policy must be made responsibly and in good faith. At the same time, a person who makes a genuine complaint should not be discouraged merely because the allegation cannot ultimately be proved.

Where the POSH Act applies, Section 14 provides a specific framework for action where the Internal Committee concludes that an allegation was malicious, that a complaint was knowingly false, or that forged or misleading documents were knowingly produced.

14.1 Good-Faith Complaints

A person may raise a complaint or concern in good faith even where:

- They do not have complete evidence at the time of making the complaint;
- They are uncertain about the appropriate legal classification of the conduct; or
- The complaint is ultimately not substantiated after inquiry.

A complaint that cannot be proved shall not, by itself, be treated as a false or malicious complaint.

The POSH Act expressly provides that mere inability to substantiate a complaint or provide adequate proof need not attract action against the complainant.

14.2 Knowingly False or Malicious Complaints

Where an applicable inquiry establishes that:

- an allegation was malicious;
- a person knowingly made a false complaint; or
- a person knowingly produced forged or misleading documents,

the ICC may recommend appropriate action in accordance with the POSH Act, applicable service or organisational rules, and the circumstances of the case.

Malicious intent must be established through the appropriate inquiry process before action is recommended.

14.3 False Evidence

Where an inquiry establishes that a witness or other person knowingly provided false evidence or produced forged or misleading documents, the ICC may recommend appropriate action in accordance with applicable law and organisational rules.

14.4 No Automatic Action for an Unsuccessful Complaint

The Foundation shall not take action against a complainant merely because:

- The allegation could not be established;
- There was insufficient evidence to reach a finding against the respondent; or
- The inquiry resulted in no finding of sexual harassment.

Any action concerning an allegedly false or malicious complaint shall require the specific circumstances and intent contemplated under applicable law to be established through the appropriate process.

14.5 Fairness to All Parties

This provision is intended to protect the integrity of the complaint process while ensuring that genuine complainants are not discouraged from reporting concerns.

The Foundation shall seek to maintain a balance between:

- protecting individuals who raise genuine concerns;
- protecting respondents from knowingly false or malicious allegations; and
- maintaining the integrity and fairness of the ICC process.

15. RECORDS, DOCUMENTATION AND ANNUAL REPORTING

Prakrtireva Saranam Foundation shall maintain appropriate records relating to the implementation of this Policy and complaints handled under the applicable POSH framework.

Records shall be maintained securely and with due regard to confidentiality and applicable legal requirements.

15.1 Complaint Records

For complaints received through the Foundation's designated Complaint & Reporting Form or any other authorised reporting channel, the Foundation may maintain appropriate records of:

- Date of receipt of the complaint;
- Nature of the complaint;
- Relevant procedural steps;
- Inquiry status, where applicable;
- Findings and recommendations;
- Action taken; and
- Closure or disposal of the matter.

Complaint records shall contain only information reasonably necessary for the relevant purpose.

15.2 Secure Record Keeping

Complaint-related records shall be stored securely, whether maintained electronically or in physical form.

Access shall be restricted to authorised persons.

The Foundation shall take reasonable measures to prevent:

- Unauthorised access;
- Unauthorised copying or sharing;
- Accidental loss;
- Unauthorised alteration; or
- Unauthorised disclosure.

The Foundation's ICC Google Form and associated response records shall be treated as confidential records, and access should be limited to persons authorised to handle ICC matters.

15.3 Evidence and Supporting Documents

Where a complainant, respondent or witness provides documents, photographs, messages, recordings or other relevant material, such material shall be handled appropriately and retained only as necessary for the complaint process and applicable legal requirements.

Persons handling such material shall not unnecessarily forward, download, publish or otherwise share it.

15.4 Annual ICC Report

Where the statutory POSH framework applies, the ICC shall prepare an annual report in accordance with Section 21 of the POSH Act and the applicable Rules. The Act

requires the Internal Committee to prepare an annual report each calendar year and submit it to the employer and the District Officer.

The annual report prescribed under Rule 14 includes information such as:

- Number of sexual-harassment complaints received during the year;
- Number of complaints disposed of during the year;
- Number of cases pending for more than 90 days;
- Number of workshops or awareness programmes conducted; and
- Nature of action taken by the employer or District Officer.

15.5 Confidentiality in Annual Reporting

Annual reporting shall not disclose confidential information prohibited from publication or disclosure under the POSH Act.

The Foundation shall ensure that individual complainants, respondents and witnesses are not unnecessarily identified in publicly accessible reports.

15.6 Organisational Reporting

Where applicable, the Foundation shall include or communicate the information required under Section 22 of the POSH Act in the manner prescribed by law. Section 22 addresses the inclusion of the number of cases filed and their disposal in the organisation's annual report, or communication of such information to the District Officer where no such report is required.

15.7 Retention and Disposal of Records

Complaint and inquiry records shall be retained for the period required by applicable law or for as long as reasonably necessary for legitimate organisational, legal or compliance purposes.

When records are no longer required to be retained, they may be securely disposed of in accordance with the Foundation's record-management practices and applicable law.

15.8 Internal Monitoring

The Foundation may periodically review the implementation of this Policy, including:

- Awareness and training activities;
- Accessibility of the complaint mechanism;
- Functioning of the ICC;
- Timeliness of complaint handling;
- Compliance with applicable reporting requirements; and
- Any improvements required to strengthen prevention and redressal mechanisms.

15.9 No Public Disclosure of Complaint Details

The Foundation shall not publish individual complaint forms, complaint responses, evidence, inquiry proceedings or other confidential complaint material on its website or social-media channels.

Any information published publicly shall be limited to information that may lawfully be disclosed and shall respect the confidentiality requirements applicable to POSH matters.

16. POLICY GOVERNANCE, REVIEW AND AMENDMENTS

Praktireva Saranam Foundation shall periodically review this Policy to ensure that it remains appropriate, effective and aligned with applicable law and the Foundation's activities.

16.1 Policy Ownership

The Internal Complaints Committee (ICC) shall be the designated policy owner for matters relating to the implementation of the POSH framework, subject to the oversight and governance authority of the Foundation's Board of Directors.

The Board of Directors shall retain overall responsibility for approving and authorising this Policy and any material amendments to it.

16.2 Effective Date

This Policy shall come into effect from the date approved by the Board of Directors.

Effective Date: _____

The Policy shall remain in force until amended, replaced or withdrawn by the Foundation through the appropriate approval process.

16.3 Review

The Policy shall be reviewed:

- Periodically;
- When there is a material change in applicable law;
- When there is a significant change in the Foundation's organisational structure or activities;
- When the Foundation identifies a need to strengthen its prevention or complaint-handling mechanisms; or
- Following any other circumstance that reasonably requires a policy review.

The Foundation may review the Policy earlier than the scheduled review date whenever necessary.

16.4 Amendments

Any amendment to this Policy shall be appropriately reviewed and approved by the authorised governance body of the Foundation.

Where an amendment affects the statutory functioning or responsibilities of the ICC, the Foundation shall ensure that the amended provisions remain consistent with applicable law.

16.5 Version Control

Each approved version of this Policy shall be assigned a version number and maintained with appropriate records of:

- **Version number;**
- **Effective date;**
- **Approval date;**
- **Summary of material changes;**
- **Approved by; and**
- **Next scheduled review date.**

16.6 Communication of Changes

Material changes to this Policy shall be communicated to persons covered by the Policy through appropriate channels.

The updated Policy may be made available through the Foundation's website and other relevant communication channels.

16.7 Conflict with Applicable Law

If any provision of this Policy is inconsistent with a mandatory requirement of applicable law, the applicable legal requirement shall prevail to the extent of the inconsistency.

The Foundation shall review and amend the affected provision as appropriate.

16.8 Severability

If any provision of this Policy is determined to be invalid, unlawful or unenforceable, the remaining provisions shall continue to operate to the extent permitted by applicable law.

16.9 Board Approval

This Policy shall be formally approved by the Board of Directors of Praktireva Saranam Foundation before being published as the Foundation's official POSH & Safe Workplace Policy.

Approved By: Board of Directors

Approval Date: 23 August 2026

Policy Version: 1.0

Next Review Date: _____

17. CONTACT AND REPORTING MECHANISM

Praktireva Saranam Foundation provides a designated mechanism through which concerns or complaints covered by this Policy may be reported.

17.1 Designated Complaint and Reporting Form

The Foundation provides an online reporting mechanism through which a person covered by this Policy may submit a complaint or concern relating to sexual harassment or other conduct covered by this Policy.

Complaint & Reporting Form:

<https://forms.gle/EAKSLK6V9bggvWeg7>

The form provides an accessible channel for submitting information regarding:

- **The incident or concern;**
- **Persons involved;**
- **Witnesses, where applicable;**
- **Supporting evidence, where available;**
- **Immediate safety concerns; and**
- **Assistance or action requested.**

Submission through the form does not, by itself, determine whether the matter is to be handled through the Foundation's internal process or an applicable statutory mechanism.

Where the POSH Act applies, the Foundation shall ensure that the complaint is dealt with through the appropriate statutory mechanism in accordance with applicable law.

17.2 Information to Include in a Complaint

Where reasonably possible, a complaint should provide relevant details such as:

- **Date and approximate time of the incident;**
- **Location or context in which it occurred;**
- **Description of the conduct or concern;**
- **Identity of the person against whom the complaint is made, if known;**

- Names of witnesses, if any;
- Relevant documents or other evidence, if available; and
- Any immediate safety or support concerns.

A person should not delay reporting merely because they do not have complete evidence or all the requested information.

17.3 Alternative Reporting

If a person is unable or unwilling to use the online ICC Complaint Form, they may contact the designated ICC or another authorised Foundation representative through the official reporting channel communicated by the Foundation.

Where a complaint is required to be dealt with under the POSH Act, the Foundation shall follow the applicable statutory requirements regarding the manner and timing of complaints.

17.4 Confidentiality

Information submitted through the ICC Complaint Form shall be treated as confidential and handled in accordance with Section 10 — Confidentiality, Privacy and Protection of Information of this Policy and applicable law.

The Google Form link shall therefore be shared only through appropriate official channels and shall not provide public access to the underlying responses or response spreadsheet.

17.5 Emergency Situations

The ICC Complaint Form should not be relied upon as an emergency-response mechanism.

Where a person faces an immediate threat to their safety or believes that an offence requiring urgent intervention has occurred, they should seek appropriate emergency, medical, law-enforcement or other competent assistance.

17.6 Website Reporting

The Foundation's website may provide a clearly visible "Report a Concern" or "Complaint & Reporting Form" button linking to the designated Google Form.

The website shall not display:

- Complaint submissions;
- Individual case information;
- Evidence submitted by complainants;
- ICC inquiry records; or
- Private contact information of complainants, respondents or witnesses.

The website may also provide access to this Policy and general information regarding the Foundation's commitment to prevention, protection and appropriate redressal.

17.7 Updating the Reporting Channel

If the Foundation changes its ICC reporting mechanism, the Policy, website and relevant communication materials shall be updated so that persons covered by the Policy have access to the current reporting channel.

18. POLICY ACKNOWLEDGEMENT AND COMPLIANCE

Prakrtireva Saranam Foundation expects all persons covered by this Policy to familiarise themselves with the standards and procedures contained in it and to conduct themselves accordingly.

18.1 Access to the Policy

The Foundation shall make this Policy reasonably accessible to persons covered by it, including through:

- The Foundation's website;
- Volunteer onboarding and orientation;
- Internal communication channels; and
- Other appropriate organisational channels.

18.2 Understanding of the Policy

Persons associated with the Foundation are expected to read and understand:

- The Foundation's commitment to a safe and respectful environment;
- Conduct prohibited under this Policy;
- Available complaint and reporting mechanisms;
- Confidentiality requirements;
- Protection against retaliation; and
- Their responsibilities when participating in Foundation activities.

18.3 Volunteer and Team Compliance

Volunteers, interns, trainees, consultants, directors, representatives and other persons associated with the Foundation are expected to comply with the behavioural standards and requirements applicable to their role under this Policy.

Failure to comply with applicable organisational requirements may result in appropriate action in accordance with the person's role, applicable policies, contractual or engagement terms, and applicable law.

18.4 Policy Acknowledgement

Where the Foundation requires an acknowledgement, a person may be asked to confirm that they:

- Have been provided access to the Policy;
- Have read or been given an opportunity to understand the Policy;
- Understand the expected standards of conduct; and
- Understand the available mechanism for raising concerns or complaints.

Such acknowledgement is intended to confirm awareness of the Policy and does not waive or restrict any statutory or legal rights available to the individual.

18.5 No Separate Declaration Required

The Foundation does not require a separate declaration form solely for the purpose of submitting a complaint under this Policy.

A person making a complaint may use the Foundation's designated Complaint & Reporting Form or another authorised reporting mechanism.

Any declaration or confirmation incorporated into the Complaint & Reporting Form shall be treated as part of that reporting process.

18.6 Continuing Responsibility

Awareness of this Policy does not replace the responsibility to behave respectfully.

All persons covered by the Policy are expected to:

- Maintain appropriate professional boundaries;
- Respect the dignity and privacy of others;
- Avoid prohibited conduct;
- Raise genuine concerns through appropriate channels; and
- Cooperate with authorised processes where required.

18.7 No Waiver of Legal Rights

Nothing in this Policy, or in any acknowledgement of the Policy, shall be interpreted as requiring an individual to give up, limit or waive any right or remedy available under applicable law.

19. ANNEXURES AND SUPPORTING DOCUMENTS

The following documents and resources may support the implementation of this Policy. They shall be maintained separately from the main Policy document and updated as required.

19.1 ICC Constitution / Appointment Order

The Foundation shall maintain a formal written order or appointment document constituting the Internal Complaints Committee, where required under applicable law.

The document may specify:

- Name of the Presiding Officer;
- Names and roles of ICC members;
- External member details;
- Date of constitution;
- Tenure of members; and
- Other information required under applicable law.

The current ICC constitution/order shall be maintained as an official organisational record.

19.2 Complaint & Reporting Form

The Foundation's designated Complaint & Reporting Form is the primary online reporting mechanism referred to in this Policy.

Complaint & Reporting Form:

<https://forms.gle/EAKSLK6V9bggvWeg7>

The form shall be maintained separately from this Policy and may be updated when necessary, provided that changes remain consistent with this Policy and applicable law.

19.3 Awareness and Training Records

The Foundation may maintain records of POSH-related awareness, orientation and training programmes conducted for relevant persons.

Such records may include:

- Date of programme;
- Topic covered;
- Facilitator/trainer;
- Participants; and
- Relevant supporting material.

19.4 Annual ICC Report

Where applicable under the POSH Act, the ICC shall maintain and submit the required annual report in accordance with applicable law.

The annual report shall be maintained as a confidential organisational record except for information that is lawfully required or permitted to be disclosed.

19.5 Supporting Legal and Organisational Documents

The Foundation may maintain additional documents required for effective implementation of this Policy, including:

- Applicable POSH legislation and Rules;
- ICC orientation or training material;
- Complaint-handling procedures;
- Internal administrative procedures;
- Relevant Board resolutions or approvals; and
- Other documents required for compliance.

19.6 Website Publication

The public website may provide access to:

- This Policy;
- A brief explanation of the Foundation's POSH and safe-workplace commitment;
- The ICC complaint/reporting mechanism; and
- Other information that is legally required or appropriate for public disclosure.

Confidential documents, complaint records, evidence, inquiry proceedings and personally identifiable complaint information shall not be published on the public website.

19.7 Document Control

The Policy and its supporting documents shall be maintained under appropriate document-control practices.

Where a supporting document is revised, the Foundation shall ensure that the relevant version is clearly identifiable and that obsolete versions are appropriately archived.

POLICY APPROVAL

Policy Name: Prevention of Sexual Harassment (POSH) & Safe Workplace Policy

Organisation: Prakrtireva Saranam Foundation

Policy Version: 1.0

Effective Date: _____

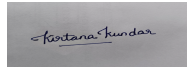
Approved By: Board of Directors

Approval Date: 23 August 2026

Policy Owner: Board of Directors / Internal Complaints Committee, as applicable

Next Review Date: _____

Authorised Signature:

A small rectangular box containing a handwritten signature in cursive script that reads "Kirtana Kunder".

Name & Designation: Kirtana Kunder - Director
