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PREVENTION OF SEXUAL HARASSMENT AT THE WORKPLACE POLICY (PoSH)

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1. Preamble and Purpose

Zentegra Advisors Private Limited (hereinafter referred to as "the Company") is committed to providing a safe, inclusive, healthy, dignified and harassment-free workplace for women. Every woman associated with the Company, irrespective of her age, designation, employment status or nature of engagement, has the right to work in an environment where she is treated with dignity, respect and courtesy.

This Policy is specifically framed to prevent, prohibit and redress sexual harassment of women at the workplace in accordance with the PoSH Act, 2013 and the Rules framed thereunder.

The Company has zero tolerance for sexual harassment and is committed to addressing every complaint promptly, fairly and in accordance with applicable law.

1.1 Objectives of This Policy

1. Raise awareness of the PoSH Act, 2013 among all employees, contractors and associated persons.
2. Provide a clearly defined, accessible and time-bound mechanism for filing and resolving complaints.
3. Ensure that complainants are protected from retaliation and that confidentiality is maintained throughout the process.
4. Cultivate a workplace culture of respect, inclusivity, dignity and gender sensitivity.
5. Comply with all applicable statutory obligations, including annual reporting requirements and awareness training mandates.

2. Applicability

This Policy applies to all women associated with the Company, including but not limited to:

1. Permanent, temporary, contractual, probationary, ad-hoc and daily-wage employees.
2. Trainees, interns and apprentices.
3. Consultants, freelancers and independent contractors.
4. Visitors, clients, suppliers and vendors while at or in connection with the workplace.

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5. Employees working from home, at client locations, co-working spaces or any remote location.

This Policy applies to conduct occurring:

1. Within the physical premises of the Company, including offices, branches, parking lots and guest houses.
2. During work-related travel, official events, conferences, team outings and off-site meetings.
3. Through digital and virtual channels used for work-related communication.
4. In any other context that has a reasonable nexus to employment.

3. Definitions

Sexual Harassment	Any unwelcome act or behaviour - whether physical, verbal, written, non-verbal, electronic or through gestures - of a sexual nature. It includes both Quid Pro Quo harassment (where a benefit or detriment is tied to sexual compliance) and Hostile Work Environment harassment (where conduct creates an intimidating, offensive or humiliating work environment). The list of specific acts is set out in Section 4 below.
Aggrieved Woman / Complainant	A woman of any age - whether an employee or not - who alleges to have been subjected to any act of sexual harassment by the respondent at the workplace. Where the aggrieved woman is unable to file a complaint due to physical or mental incapacity, her relative, friend, co-worker, psychologist, special educator or guardian may file on her behalf with written consent.
Respondent	Any person - employee or otherwise, against whom a complaint of sexual harassment has been filed by the aggrieved woman under this Policy.
Employee	Any person employed by the Company for any work on a regular, temporary, ad-hoc or daily-wage basis directly or through a contractor or agent - whether for remuneration or not. Includes co-workers, probationers, trainees and apprentices.
Employer	The person or persons responsible for the management, supervision and control of the workplace at the Company.

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Workplace	The physical premises, offices, branches and locations of the Company and extends to: any place visited by an employee in connection with work; official transport and accommodation; social gatherings, conferences or events organised by the employer; any digital or virtual environment used for work-related interaction; and any place from which an employee connects for work remotely. See also Section 8 (Remote Work).
Internal Committee (IC)	The Internal Committee constituted by the Company under Section 4 of the PoSH Act, 2013 to receive and inquire into complaints of sexual harassment made by an aggrieved woman in accordance with the Act and Rules.
Digital Sexual Harassment	Any act of sexual harassment committed through digital or electronic means, including email, messaging platforms, video calls, social media or any online channel used in the course of employment.
Conciliation	A process by which the IC, on the request of the aggrieved woman, attempts to resolve the complaint between the complainant and respondent - without monetary settlement as a basis.
Quid Pro Quo	A form of harassment where submission to or rejection of sexual advances is used as the basis for employment decisions, promotion, remuneration or any other benefit.
Hostile Work Environment	A form of harassment where conduct of a sexual nature creates an intimidating, hostile, offensive or humiliating work environment that unreasonably interferes with an individual's work.

4. What Constitutes Sexual Harassment

Sexual harassment includes, but is not limited to, the following categories of behaviour:

4.1 Physical Harassment

1. Unwelcome touching, patting, pinching, brushing or any physical contact of a sexual nature.
2. Stalking, physically cornering or following an individual.
3. Coerced sexual acts, assault or molestation.

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4. Indecent gestures or inappropriate physical conduct during in-person or virtual interactions.

4.2 Verbal Harassment

1. Sexually coloured remarks, innuendos, jokes or taunts.
2. Demand or request for sexual favours - explicit or implicit.
3. Comments about a person's body, appearance or private life in a sexual or degrading manner.
4. Unwelcome flirting, suggestive sounds or sexually charged language in person or on calls.

4.3 Written and Electronic Harassment

1. Sexually explicit or suggestive messages, emails, chats or letters.
2. Sharing or forwarding pornographic material, explicit images or offensive memes through any medium.
3. Display of sexually suggestive objects, posters or digital content in workspaces (physical or virtual).
4. Written communication - including emojis, GIFs or stickers - that carries sexual connotations.

4.4 Visual and Non-Verbal Harassment

1. Leering, staring or making sexually suggestive facial expressions or gestures.
2. Displaying pornographic or sexually explicit material - including during screen-sharing.
3. Recording video calls, meetings or interactions without consent for inappropriate purposes.
4. Sending unsolicited photographs, videos or screenshots of a sexual or offensive nature.

4.5 Emotional / Psychological Harassment

1. Demanding sexual favours in exchange for promotion, favourable appraisals or continued employment.
2. Implied or explicit threats of detrimental treatment for refusing sexual advances.
3. Persistently creating an intimidating, hostile or offensive work environment through repeated behaviour.
4. Monitoring, surveilling or tracking an employee in a manner intended to intimidate, harass or sexually target them.

The following circumstances, if present in relation to any of the above acts, may additionally amount to sexual harassment:

1. Implied or explicit promise of preferential treatment in employment.
2. Implied or explicit threat to present or future employment status.

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3. Humiliating treatment likely to affect physical or mental health or safety.
4. Interference with work or the creation of an intimidating, offensive or hostile work environment.

Note: The above list is illustrative and not exhaustive. A single serious incident, as well as a pattern of repeated behaviour, can both constitute sexual harassment. The fact that an interaction occurs through a digital or virtual medium does not reduce its severity or the protections available to the aggrieved woman. For avoidance of doubt, conduct shall ordinarily fall within this Policy where it has a sexual, gender-based or sexually coloured element.

5. Duties and Responsibilities

5.1 Responsibilities of All Employees

Every employee is responsible for maintaining a respectful and professional workplace. Each employee must:

1. Treat all colleagues, clients and visitors with dignity and respect in all interactions - verbal, written or virtual.
2. Refuse to participate in or encourage any behaviour that constitutes sexual harassment.
3. Report any incident of sexual harassment witnessed or experienced to the IC without delay.
4. Support and act as a witness for a colleague who has been harassed, if called upon.
5. Cooperate fully with any investigation or inquiry conducted by the IC.
6. Acknowledge receipt and understanding of this Policy (written or digital acknowledgment required).
7. Refrain from retaliating against any complainant, witness or IC member.
8. Reflect on one's own verbal and non-verbal behaviour and its potential impact on colleagues.

5.2 Responsibilities of Managers and Supervisors

In addition to the responsibilities above, all managers and supervisors must:

1. Actively foster a culture of respect, equality and inclusion within their teams.
2. Promptly escalate any complaint or incident of sexual harassment brought to their attention to the IC.
3. Avoid assigning work based on gender stereotypes where employees of equal designation and capability are involved.
4. Not take any adverse action - including reassignment, demotion or adverse review - against an employee for filing a complaint.

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5. Disclose any personal relationship (by blood, marriage or otherwise) with a direct report that could create a conflict of interest.
6. Attend all mandatory PoSH training and awareness sessions.

5.3 Responsibilities of the Employer / Management

1. Provide a safe working environment, including safety from persons who come into contact with employees at the workplace.
2. Constitute and maintain the IC as required under the PoSH Act.
3. Display details of the IC, the PoSH Policy and penal consequences in a conspicuous place - including on the Company intranet and official notice boards.
4. Organize and conduct mandatory PoSH awareness and training programmes - at induction and at least annually thereafter.
5. Obtain signed acknowledgements from all employees confirming they have read and understood this Policy.
6. Provide necessary facilities, including a private meeting space, to the IC for conducting inquiries.
7. Assist in securing the attendance of respondents and witnesses before the IC.
8. Implement IC recommendations within 60 days of receipt and report implementation to the IC.
9. File an annual report with the District Officer under the PoSH Act and submit details to the relevant authority.
10. Assist an aggrieved woman, if she so chooses, in filing a complaint under the applicable criminal law.
11. Include PoSH training in annual calendars and monitor and revise the Policy regularly.
12. Maintain records of all IC proceedings and reports in secure, confidential files.

5.4 Responsibilities of the IC

1. Receive and acknowledge complaints within 7 working days of receipt.
2. Conduct all proceedings in accordance with the principles of natural justice.
3. Complete the inquiry within 90 days of receiving the complaint.
4. Maintain strict confidentiality at every stage - complaint, inquiry, findings and recommendations.
5. Protect the complainant and witnesses from further victimisation or discrimination during the inquiry.
6. Submit its findings and recommendations to the employer within 10 days of completing the inquiry.
7. Submit an annual report to the employer and the District Officer in the prescribed format.
8. Conduct regular gender-sensitisation programmes for IC members and employees.
9. Assist an aggrieved woman in filing a complaint with the police, if she so chooses.

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10. Maintain complete and accurate documentation of every complaint, inquiry and resolution.

6. Internal Committee (IC)

6.1 Constitution

Every workplace having ten or more employees is required to constitute an Internal Committee under the PoSH Act. In compliance with Section 4 of the PoSH Act, 2013, the Company has constituted an Internal Committee (IC) to receive and inquire into complaints of sexual harassment.

1. The IC is constituted in accordance with the following statutory requirements:
2. The Presiding Officer must be a woman employed at a senior level at the workplace.
3. At least half of the total IC members must be women.
4. At least two members must be from among employees preferably committed to the cause of women or with experience in social work or legal knowledge.
5. One external member must be from an NGO or association committed to the cause of women or a person familiar with issues relating to sexual harassment and the law.
6. The term of each member shall not exceed three (3) years from the date of nomination.

6.2 Removal or Replacement of IC Members

A Presiding Officer or member of the IC may be removed if they:

1. Contravene any provision of this Policy or the PoSH Act.
2. Are convicted for an offence or have a pending inquiry under any law.
3. Are found guilty in any disciplinary proceedings or have a disciplinary proceeding pending against them.
4. Have abused their position in a manner prejudicial to public interest.
5. Any IC member having an actual or perceived conflict of interest shall disclose the conflict and recuse themselves from the proceedings relating to that matter.

Any vacancy arising from cessation of employment, resignation, death, disability or removal shall be filled by fresh nomination by the Company.

The IC may be contacted at:

Email: poshcommittee@zentegra.com

7. Complaint and Redressal Mechanism

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The following flowchart summarises the complaint process. Each step is detailed below.

Step 1: Filing of Complaint - *Within 3 months of the incident*
Step 2: IC Acknowledges & Sends Notice to Respondent - *Within 7 working days*
Step 3: Conciliation (if requested by aggrieved woman) - *Within 2 weeks*
Step 4: Formal Inquiry - *Within 90 days of receipt*
Step 5: Findings & Recommendations to Employer - *Within 10 days of inquiry completion*
Step 6: Employer Acts on Recommendations - *Within 60 days of receipt*
Step 7: Right of Appeal - *Within 90 days of recommendations*

7.1 Filing of Complaint

An aggrieved woman may file a complaint in writing to any member of the IC within three (3) months of the date of the incident or within three (3) months of the last incident in a series. The IC may extend this period by up to three (3) months if it is satisfied that circumstances prevented timely filing.

The complaint must include:

1. Name and contact details of the complainant.
2. Name and designation of the respondent.
3. A clear description of the incident(s), including dates, times and location.
4. Names and details of any witnesses, if known.
5. Any supporting documentary evidence available.

Sufficient copies (physical or electronic) of the complaint along with all supporting documents must be submitted. Complaints may be filed:

6. In writing, delivered to any IC member.
7. By email to: poshcommittee@zentegra.com
8. Through the Government of India's SHe-Box Portal: shebox.wcd.gov.in

Where a complaint cannot be made in writing, the Presiding Officer or any IC member shall render all reasonable assistance. Where the aggrieved woman is unable to file due to

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physical or mental incapacity, a relative, friend, co-worker, psychologist, special educator or guardian may file on her behalf with written consent.

7.2 Rights of the Complainant

1. An empathetic, safe and supportive environment in which to state the grievance.
2. Confidentiality of identity throughout the process.
3. Access to copies of all evidence and witness statements submitted by the respondent.
4. Option to have her statement recorded in the absence of the respondent if there is a risk of intimidation.
5. Interim relief as may be appropriate (see Section 7.5).
6. Assistance in lodging a First Information Report (FIR), if she chooses to pursue criminal proceedings.
7. Right to appeal against the recommendations of the IC.

7.3 Rights of the Respondent

1. A patient, impartial hearing to present their case.
2. Access to copies of all evidence and witness statements submitted by the complainant.
3. Confidentiality of identity throughout the process.
4. Right to appeal against the recommendations of the IC.

7.4 Conciliation

Before initiating a formal inquiry, the IC may, at the request of the aggrieved woman, take steps to settle the matter through conciliation. The following conditions apply:

1. Conciliation may only be initiated at the express request of the complainant -the IC shall not initiate conciliation on its own.
2. No monetary settlement shall form the basis of conciliation.
3. If a settlement is reached, the IC shall record the terms and provide copies to both parties and shall report the settlement to the employer.
4. The aggrieved woman may approach the IC again if the terms of settlement are not honoured by the respondent - the IC shall then proceed with a formal inquiry.
5. Conciliation shall be completed within two (2) weeks of receipt of the complaint.

7.5 Interim Relief

During the pendency of the inquiry, the IC may, on written request by the complainant, recommend to the employer:

1. Transfer of the complainant or respondent to another department, team or workplace.
2. Grant of additional paid leave to the aggrieved woman - up to three (3) months, over and above any other leave entitlement.

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3. Restructuring the reporting relationship so that the respondent does not assess the complainant's work performance.
4. Any other relief deemed appropriate in the circumstances.

The employer shall implement interim relief recommendations promptly and report implementation to the IC.

7.6 Formal Inquiry

Initiation

A formal inquiry shall be initiated where:

1. No conciliation is requested by the aggrieved woman.
2. Conciliation has been requested but has not resulted in a settlement.
3. The aggrieved woman informs the IC that the terms of a conciliation settlement have not been honoured by the respondent.

Conduct of Inquiry

1. The IC shall send a copy of the complaint to the respondent within seven (7) working days of receipt.
2. The respondent shall file a written reply with all supporting documents within ten (10) working days of receiving the complaint.
3. No legal practitioner shall represent either party at any stage of the IC proceedings.
4. As a matter of good governance, the inquiry shall ordinarily be conducted in the presence of at least three IC members, including the Presiding Officer, wherever practicable.
5. The IC shall follow the principles of natural justice - both parties shall have a fair opportunity to present their case and respond to evidence.
6. The IC shall call upon all witnesses named by both parties.
7. Neither party shall directly cross-examine the other. Questions relevant to the proceedings may be submitted to the IC, which may put such questions to the concerned party or witness as it considers appropriate.
8. If either party fails to attend three consecutive hearings without sufficient cause, the IC may issue an ex-parte decision after giving fifteen (15) days' written notice.
9. The inquiry shall be completed within ninety (90) days of receipt of the complaint.
10. Stereotype-based assumptions about gender, conduct or credibility are expressly prohibited during inquiry proceedings, in line with the Supreme Court of India's handbook on combating gender stereotypes.

Powers of the IC

The IC has the powers of a civil court to:

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1. Summon and enforce attendance of any person.
2. Require the discovery and production of documents.
3. Take evidence on oath.
4. Issue directions to parties as necessary for the inquiry.

7.7 Findings and Disciplinary Action

Outcome	Action
Allegations NOT proved	IC recommends no action against the respondent. Both parties are informed that the matter is fully investigated and concluded and neither shall be disadvantaged in the organisation.
Allegations PROVED	IC recommends appropriate disciplinary action proportionate to the severity of the misconduct (see below).
Malicious or False Complaint	IC recommends action against the complainant similar to that applicable to the respondent in proven cases. A complaint shall not be treated as malicious merely because the allegation could not be proved. A finding of malicious or knowingly false complaint shall require a separate determination based on evidence and shall not be inferred solely from dismissal of the complaint.

Where the allegations are proved, the IC may recommend one or more of the following disciplinary actions:

9. Written warning or letter of censure placed on record.
10. Written apology from the respondent.
11. Withholding of increment, promotion or any other benefit.
12. Suspension - with or without pay.
13. Counselling or mandatory sensitisation training.
14. Payment of appropriate compensation to the aggrieved woman or her legal heir, to be deducted from the respondent's salary.
15. Termination of employment.
16. Any other action the Management deems fit.

In determining compensation, the IC shall consider the mental trauma, emotional distress, physical suffering, career loss and financial impact on the aggrieved woman, as well as the respondent's income and ability to pay.

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The employer shall act upon the IC's recommendations within sixty (60) days of receipt and confirm implementation to the IC.

7.8 Appeal

Any party aggrieved by the recommendations of the IC or by the employer's implementation (or non-implementation) of such recommendations, may file an appeal to the appropriate authority under applicable law of appropriate jurisdiction within ninety (90) days of the recommendations being communicated, in accordance with the PoSH Act and Rules.

8. Sexual Harassment in Remote and Virtual Work Environments

The growth of remote work, hybrid arrangements and virtual collaboration has extended the boundaries of the workplace well beyond physical premises. The PoSH Act, 2013 applies to the workplace in its broadest sense and its protections extend fully to employees working from home, remotely or through virtual channels in the course of their employment.

This section is an integral part of this Policy - not a separate addendum - and must be read together with all other sections.

8.1 Scope: Who and What Is Covered

This section applies to all individuals covered under Section 2 (Applicability) of this Policy, regardless of work location. The term 'workplace' for remote contexts includes:

1. The employee's home or any other location from which work duties are performed.
2. Virtual meeting platforms (e.g., Microsoft Teams, Zoom, Google Meet, Webex).
3. Official messaging and email platforms (e.g., Slack, WhatsApp for Business, Google Chat).
4. Project management and collaboration tools (e.g., Jira, Asana, Trello, Notion).
5. Social media platforms used for professional or work-related communication.
6. Video calls, audio calls and voice messages made in the course of employment.
7. Any other digital space where work-related interactions between employees take place.

8.2 Prohibited Conduct in Remote and Virtual Environments

The following behaviours are expressly prohibited in any virtual or digital work-related context:

Verbal and Written Harassment

1. Sending sexually suggestive, offensive or unwelcome messages, emails or chats.
2. Making inappropriate or sexual comments during video calls or virtual meetings.
3. Sharing sexually explicit jokes, memes, images, videos or links through work

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communication channels.

4. Using derogatory or gender-based language in any work-related communication.

Visual and Audio Harassment

1. Displaying sexually explicit or offensive material during video calls or screen-sharing.
2. Recording video calls, meetings or conversations without consent for inappropriate purposes.
3. Making unwanted sexual gestures during virtual interactions.
4. Sending unsolicited photographs, screenshots or videos of a sexual or offensive nature.

Behavioural and Psychological Harassment

1. Persistently contacting an employee outside working hours for unwelcome personal, sexual, intimidating or inappropriate interactions.
2. Making quid pro quo demands or unwelcome advances through digital means.
3. Monitoring or tracking an employee's personal online activity without consent.
4. Pressuring an employee to appear on video or in a specific manner when they are uncomfortable, particularly in a home setting.
5. Creating a hostile, intimidating or offensive virtual work environment through repeated behaviour.
6. Insisting on unnecessary late-night calls, isolated one-on-one virtual interactions or communication patterns that are intimidating, sexually inappropriate or exploitative.
7. Making unwelcome sexual or sexually coloured comments through social media or digital channels where the interaction has a work-related connection or involves colleagues/other persons covered by this Policy.

8.3 Employer Responsibilities (Remote Context)

1. Communicate this Policy and any updates to all remote and work-from-home employees at onboarding and annually thereafter.
2. Include remote work scenarios and digital harassment in all PoSH training programmes.
3. Train IC members to receive and handle complaints arising from remote and virtual environments.
4. Ensure remote employees have clear, accessible information on IC members' names, contact details and the complaint process.
5. Facilitate filing of complaints via email and through the SHe-Box Portal (shebox.wcd.gov.in).
6. Take disciplinary action against digital sexual harassment, irrespective of the respondent's seniority or work location.
7. Protect complainants and witnesses from retaliation whether in person or through

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digital channels.

8.

8.4 Employee Responsibilities (Remote Context)

1. Maintain professional conduct during all video calls, virtual meetings and digital interactions.
2. Refrain from sending, sharing or displaying any sexual, offensive or derogatory material through any work communication channel.
3. Treat all colleagues with dignity and respect in every form of digital communication.
4. Report any experienced or witnessed digital sexual harassment to the IC without delay.
5. Maintain strict confidentiality about any complaint or inquiry they become aware of.

9. Confidentiality

All information related to a complaint under this Policy is strictly confidential. No person - including IC members, the employer, HR personnel or any party to the complaint - shall publish, communicate or disclose, in any manner, to the public, press or media:

1. The contents of the complaint.
2. The identity and contact details of the complainant, respondent or witnesses.
3. Any information relating to conciliation or inquiry proceedings.
4. The recommendations of the IC or action taken by the employer.

Any breach of confidentiality shall invite disciplinary action in accordance with the applicable service rules and the provisions of the PoSH Act, 2013.

> Exception:
> Information that is required to be disclosed for the purpose of taking action under this Policy (e.g., notifying the respondent or relevant IC members) shall not be considered a breach of confidentiality.

10. Protection Against Retaliation

The Company strictly prohibits any form of retaliation against an aggrieved woman who raises a complaint of sexual harassment and against any person who cooperates with an IC inquiry or acts as a witness. Retaliation includes, but is not limited to:

1. Termination, demotion or adverse changes to work assignments or reporting structure.
2. Exclusion from meetings, communications or work groups - physical or virtual.

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3. Hostile, dismissive or intimidating behaviour through any channel.
4. Poor performance reviews linked directly or indirectly to the filing of a complaint.
5. Pressure - direct or indirect - to withdraw a complaint.

Retaliation shall be treated as a separate and serious misconduct and will attract disciplinary action, including termination. Employees who experience or are threatened with retaliation must report it immediately to the IC. Such reports will be treated with the same seriousness as a primary harassment complaint.

11. Awareness, Training and Sensitisation

The Company is committed to building a culture of respect through ongoing education and awareness. The following initiatives shall be undertaken:

1. Induction Training: All new employees must complete a mandatory PoSH awareness module as part of their induction programme within the first 30 days of joining.
2. Annual Refresher: A mandatory PoSH refresher programme shall be conducted at least once every calendar year for all employees, including managers and IC members.
3. IC Training: IC members shall receive specialised training on inquiry procedures, principles of natural justice, gender sensitisation and handling of digital/remote harassment complaints.
4. Awareness Materials: PoSH posters, the IC contact details and the key provisions of this Policy shall be displayed in all offices and on the Company intranet. Remote employees shall receive the same materials digitally.
5. Manager Sensitisation: Dedicated workshops shall be held for managers and supervisors to address unconscious bias, gender stereotyping and bystander responsibility.
6. Policy Acknowledgement: All employees must sign or digitally confirm their acknowledgement of this Policy annually.

12. Relationship Disclosure

To prevent conflicts of interest and ensure impartiality in complaint handling, employees must disclose to HR or the designated authority any relationship or circumstance that creates or may reasonably be perceived to create, a conflict of interest in the handling of a PoSH complaint, inquiry, investigation, appraisal, reporting relationship or related decision. The Company will use such disclosures solely to manage potential conflicts in the context of PoSH-related matters and will handle them with sensitivity and discretion.

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13. Annual Reporting

The Internal Committee shall prepare the annual report for each calendar year and submit it to the Employer and the concerned District Officer within the prescribed statutory timeline ordinarily by 31 January of the following year or such other date/manner as may be prescribed by the applicable authority. The report shall include:

1. Number of complaints of sexual harassment received during the year.
2. Number of complaints disposed of during the year.
3. Number of cases pending for more than ninety (90) days.
4. Number of awareness and sensitisation programmes conducted.
5. Nature of action taken by the employer on IC recommendations.

The employer shall include the details of the annual report in its annual report (if applicable) or submit it to the relevant authority as required by law.

14. Amendments, Savings and Governing Law

14.1 Amendments

The Company reserves the right to amend, update or revise any provision of this Policy from time to time, to reflect changes in applicable law, regulatory guidance or organisational requirements. All amendments shall be communicated to employees and shall take effect from the date of communication.

14.2 Savings Clause

In the event of any inconsistency or conflict between the provisions of this Policy and the PoSH Act, 2013 (or any Rules or guidelines framed thereunder), the provisions of the Act shall prevail. Where an advance ruling or judicial decision is directly applicable, it shall take precedence over this Policy.

14.3 Governing Law

This Policy is governed by and construed in accordance with the laws of India, including the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, the Bharatiya Nyaya Sanhita, 2023 and any other applicable legislation.

IC Email: poshcommittee@zentegra.com

Complaints may also be filed at: shebox.wcd.gov.in (Government of India SHe-Box Portal)