



Prevention Of Sexual Harassment Policy
For
Meta Infotech Limited

Meta Infotech Limited.

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Version Control

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1.1	22 nd January 2026	Ms. Ashwini Panchal	Board Of Directors
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Page of Contents

Scope.....	4
Definition Of Sexual Harassment.....	4
Reporting Of Complaint.....	4
Reporting Channels For Complaint.....	5
Complaint Procedure	5
Interim Reliefs During Inquiry	5
Inquiry Report And Action	5
Confidentiality	6
Protection Against Victimization.....	6
Outside Remedies.....	6
Sanctions And Disciplinary Measures	6
Implementation Of Policy	6
Monitoring And Annual Reporting	6
Effective Date	7
Policy Review	7



Meta Infotech Limited (“**Company**”) is committed to providing a safe working environment free from sexual harassment and discrimination. The Company adopts a zero-tolerance approach and shall address all complaints in a fair, confidential and time-bound manner.

This Prevention of Sexual Harassment Policy (“**Policy**”/ “**POSH**”) applies to employees, trainees, interns, consultants, contract staff, clients, vendors, visitors and any person interacting with the Company at the workplace, including virtual/online spaces and off-site locations connected with work.

1. **SCOPE**

This Policy applies to all employees, trainees, consultants, interns, contract staff, clients, vendors, visitors and any person interacting with the Company at the workplace.

2. **DEFINITION OF SEXUAL HARASSMENT**

“Sexual Harassment” includes any unwelcome act or behaviour (whether directly or by implication) such as:

- Physical contact and advances
- Demand or request for sexual favours
- Making sexually coloured remarks
- Showing pornography
- Any other unwelcome physical, verbal or non-verbal conduct of sexual nature

Sexual harassment may occur regardless of gender and includes conduct occurring at:

- Office premises
- Client locations
- Business travel
- Company events, training, conferences
- Virtual/online communication platforms

3. **REPORTING OF COMPLAINT**

- An aggrieved person may submit a complaint of sexual harassment in writing to any member of the Internal Committee or through the Human Resources Department, which shall promptly forward the same to the Internal Committee for necessary action.
- The details of the Internal Committee members, along with their contact information and reporting mechanism, shall be made available to all employees through the Company’s HRMS/official internal communication platform and shall be updated from time to time.
- A complaint shall ordinarily be made within three (3) months from the date of the incident. The Internal Committee may extend this **timeline** for reasons recorded in writing, in accordance with applicable law.



4. REPORTING CHANNELS FOR COMPLAINT

An aggrieved person may submit a complaint:

- By email to: posh@metainfotech.com
- In writing to any IC member
- Through HR, who shall immediately forward it to the IC
- Anonymous complaints may be examined at the discretion of the IC

The complaint must be made within 3 months from the date of incident (extendable by IC for valid reasons).

5. COMPLAINT PROCEDURE

A. Receipt of Complaint

Upon receipt of a complaint, the Internal Committee shall record the complaint, acknowledge its receipt to the complainant, and inform the complainant of the procedure and rights available under this Policy and applicable law.

B. Conciliation

Before inquiry, the IC may facilitate conciliation only at the request of the complainant. Monetary settlement shall not be a basis of conciliation.

C. Formal Inquiry

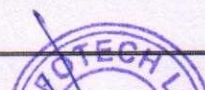
Where conciliation is not opted for or fails, the Internal Committee shall issue notice to the respondent within seven (7) days and conduct a formal inquiry to be completed within ninety (90) days. Both parties shall be given a fair opportunity to be heard and to present evidence and witnesses, and the inquiry shall be conducted in accordance with the principles of natural justice.

6. INTERIM RELIEFS DURING INQUIRY

During the pendency of the inquiry, and upon a written request by the complainant, the Internal Committee may recommend to the Company interim measures including transfer of either party, grant of leave to the complainant up to three (3) months, temporary change in reporting structure, or any other appropriate relief to ensure the safety and well-being of the complainant.

7. INQUIRY REPORT AND ACTION

- The Internal Committee shall submit its inquiry report to the Company within ten (10) days of completion of the inquiry.
- Where the allegations are proved, the Company shall take appropriate disciplinary action, which may include written apology, warning or reprimand, withholding of promotion or increment, transfer, suspension, or termination of employment.
- Where the Internal Committee concludes that the complaint was made with malicious intent, it may recommend appropriate action against the complainant in accordance with applicable law.



8. CONFIDENTIALITY

- All information relating to a complaint of sexual harassment, including but not limited to the contents of the complaint, identity and details of the complainant, respondent and witnesses, statements recorded, documents produced, inquiry proceedings, recommendations of the Internal Committee and the action taken by the Company, shall be treated as strictly confidential and shall not be disclosed, published or communicated to any person except where such disclosure is required for the purpose of conducting the inquiry or as mandated under applicable law.
- Any breach of confidentiality by any person involved in the process shall be viewed seriously and shall invite appropriate disciplinary action in accordance with the Company's policies and applicable law.

9. PROTECTION AGAINST VICTIMIZATION

No person shall be subjected to retaliation, discrimination or adverse action for filing or supporting a POSH complaint.

10. OUTSIDE REMEDIES

This Policy does not restrict the complainant from seeking remedies under applicable law before appropriate authorities or courts.

11. SANCTIONS AND DISCIPLINARY MEASURES

Depending on severity, actions may include:

- Warning (verbal/written)
- Adverse performance remarks
- Salary deduction
- Demotion/transfer
- Suspension
- Termination

Serious cases involving physical assault shall warrant immediate termination.

12. IMPLEMENTATION OF POLICY

This Policy shall form part of the Employee Handbook and shall be displayed on the Company's notice boards and website. POSH awareness training shall be conducted annually and managers shall be responsible for ensuring awareness and compliance within their teams.

13. MONITORING AND ANNUAL REPORTING

The Internal Committee shall prepare an annual report containing the number of complaints received, number of complaints disposed, details of pending cases, and awareness programs conducted during the year.



14. EFFECTIVE DATE

This Policy is effective from the date of approval by the Board.

15. POLICY REVIEW

The Board may amend this Policy in line with legal requirements.

