CHRYSALIS SERVICES · POLICY

Prevention of Sexual Harassment (POSH) Policy

Policy on prevention, prohibition and redressal of sexual harassment at the workplace

Legal entity	Chrysalisis Services Private Limited ("Chrysalis Services" or "the Company") CIN U74140TN2020PTC134552 · Registered office: Chennai, Tamil Nadu
Version	Version 1.0
Policy owner	Human Resources, with the Internal Committee
Review cycle	Annually, or earlier if the law or our operations change. Next review due by November 2027.
Applies to	All employees, interns, consultants, associates and field investigators, and protects clients, partners, donors, beneficiaries, research participants and visitors who interact with Company personnel.

1. Policy statement

Chrysalis Services is committed to a workplace in which every person is treated with dignity and respect, and in which no one is subjected to sexual harassment. Sexual harassment violates the fundamental rights of women to equality, to life and to live with dignity, and to practise any profession or carry on any occupation in a safe environment. The Company has zero tolerance for sexual harassment, whether it occurs in an office, in a virtual meeting, at a client or partner location, in a community during fieldwork, or during travel connected with work.

This Policy sets out what sexual harassment is, how a complaint can be made, how the Internal Committee will deal with it, and the protections available to everyone involved. It is the Company's policy on prevention, prohibition and redressal of sexual harassment at the workplace ("POSH Policy").

2. Legal framework

This Policy is framed in accordance with the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 ("the Act") and the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Rules, 2013 ("the Rules"). Where any provision of this Policy is inconsistent with the Act or the Rules, the Act and the Rules shall prevail.

This Policy supersedes the section titled "Prevention of Sexual Harassment at Workplace Policy (POSH)" in the Employee Handbook (2026), and the Complaints Committee constituted under that section stands replaced by the Internal Committee constituted under this Policy.

3. Scope and applicability

3.1 Who is protected

Under the Act, any woman, of any age, whether employed or not, who alleges that she has been subjected to sexual harassment at the workplace may make a complaint. Accordingly, this Policy protects:

- all employees of the Company, whether regular, temporary, contractual, probationary, part-time or ad hoc, and including trainees, apprentices and interns, whether paid or unpaid;
- consultants, associates, freelancers, field investigators and enumerators engaged by the Company;
- employees of clients, NGO partners, implementing agencies and vendors who interact with Company personnel; and
- donors, beneficiaries, community members, research participants and visitors who come into contact with Company personnel in the course of the Company's work.

3.2 Complaints by persons of any gender

The Act protects women. As a matter of Company policy, the Company will also receive and inquire into complaints of sexual harassment made by persons of any gender, and the Internal Committee will follow the same procedure, timelines and safeguards set out in this Policy. Remedies that arise only under the Act, such as those before the Local Committee or by way of statutory appeal, remain available as provided in the Act.

3.3 Who may be a respondent

A complaint may be made against any employee, director, consultant, associate, freelancer, field investigator or other person engaged by the Company. Where the person complained against is a third party, such as an employee of a client, partner or vendor, the Company will take all steps within its power, as described in Section 15.

4. Definitions

4.1 Sexual harassment

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

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

The following circumstances, among others, if they occur or are present in relation to or connected with such an act or behaviour, may also amount to sexual harassment: 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 about present or future employment status; interference with work or the creation of an intimidating, offensive or hostile work environment; and humiliating treatment likely to affect health or safety.

It is the impact of the conduct on the person receiving it, and not the intention of the person engaging in it, that determines whether the conduct was unwelcome. Illustrations of conduct that may amount to sexual harassment, including in remote and digital settings, are:

- sexually suggestive remarks, jokes, innuendo or comments about a person's body, appearance, clothing or sexual life, made in person, on calls, in meetings or in chats;
- sending sexually explicit or suggestive messages, images, videos, emojis or links by email, messaging applications or social media;

- inappropriate behaviour during video calls, or recording or circulating images of a person without consent;
- persistent unwelcome invitations, requests to meet outside work, or continued expressions of romantic or sexual interest after the person has indicated that they are unwelcome;
- stalking, persistent watching, following or contacting a person, whether physically or online; and
- threatening, intimidating or retaliating against a person who rejects advances or who speaks up about harassment.

4.2 Workplace

For the purposes of this Policy, the workplace includes every place where the Company's work is carried out or which a person visits arising out of or during the course of their work with the Company, including:

- the Company's registered office and any premises used by the Company;
- homes and other locations from which employees work remotely, and all virtual spaces used for work, including video calls, collaboration platforms, email and messaging groups;
- client offices, NGO and partner premises, programme sites, villages, schools, health facilities and other locations visited during fieldwork;
- travel undertaken for work, including transportation and accommodation arranged by the Company; and
- training programmes, workshops, conferences, team gatherings and social events connected with work.

4.3 Other terms

Term	Meaning
Aggrieved woman / complainant	The person who alleges that they have been subjected to sexual harassment at the workplace, including a person making a complaint under Section 3.2.
Respondent	The person against whom a complaint of sexual harassment has been made.
Internal Committee (IC)	The committee constituted by the Company under Section 4 of the Act, as set out in Section 5 of this Policy.
Local Committee (LC)	The committee constituted by the District Officer under Section 6 of the Act for the district in which the workplace is situated.
Employer	For the purposes of this Policy, the Managing Director of the Company.

5. The Internal Committee

The Company has constituted the following Internal Committee. In accordance with Section 4 of the Act, the Presiding Officer is a woman employed at a senior level, the Committee includes at least two members from among the employees and one external member from a non-governmental organisation familiar with issues relating to sexual harassment, and at least one-half of its members are women.

Role	Name	Designation / organisation
Presiding Officer	Ms. Apoorva Pandey	Lead, Consulting Services

Role	Name	Designation / organisation
Member	Ms. Kanmani Bharathi	Lead, Marketing and Design
Member	Ms. Kakoli Mishra	Lead, Corporate Partnerships
External Member	Ms. Parul Gupta	Prabhav Foundation

- Members will hold office for a period not exceeding three years from the date of their nomination. The external member will be paid fees and allowances as prescribed in the Rules.
- At least three members, including the Presiding Officer, must be present for any inquiry proceeding.
- A member who has a personal interest in a complaint, or who is the respondent or a witness, must recuse themselves, and the Company will nominate a replacement for that complaint in accordance with the Act.
- A member who publicises information in breach of Section 16 of the Act, who has been convicted of an offence or against whom an inquiry is pending, who has been found guilty in disciplinary proceedings, or who has abused their position, will be removed and the vacancy filled in accordance with the Act.

The Committee is responsible for receiving and inquiring into complaints, recommending interim relief and action, supporting awareness and prevention, maintaining confidential records, and submitting the annual report required by the Act.

6. Responsibilities

6.1 The Company

In line with Section 19 of the Act, the Company will:

- provide a safe working environment, including for remote work, fieldwork and travel;
- display the penal consequences of sexual harassment and the composition of the Internal Committee in a manner accessible to all, including on the intranet, by email to all staff and on the Company website;
- organise awareness programmes for employees and orientation programmes for members of the Internal Committee at regular intervals;
- provide the Internal Committee with the facilities and support necessary to deal with complaints and conduct inquiries;
- assist in securing the attendance of the respondent and witnesses, and make available information required by the Committee;
- assist the complainant, if she so chooses, in filing a complaint in relation to the offence under the Bharatiya Nyaya Sanhita, 2023 or any other law in force;
- treat sexual harassment as misconduct under its service rules and initiate action for such misconduct; and
- monitor the timely submission of reports by the Internal Committee.

6.2 Employees and managers

Every person covered by this Policy must refrain from sexual harassment, must not encourage or condone it, and is encouraged to support colleagues who experience it, including by acting as a witness.

Managers must take every concern seriously, must not attempt to investigate or settle a complaint themselves, must direct the person to the Internal Committee, and must ensure that no one who raises a concern is victimised.

7. How to make a complaint

7.1 Where to send a complaint

A complaint must be made in writing. It may be submitted through any of the following:

Channel	Details
Designated complaints mailbox	Sarutha Narayanan, Senior Executive – HR sarutha@chrysalis-services.in Complaints received will be forwarded to the Presiding Officer within one working day and will not be shared with anyone else. The designated contact is not a member of the Internal Committee and has no role in the inquiry.
Directly to the Internal Committee	In writing to the Presiding Officer or any member of the Internal Committee.
Complaints against the Managing Director	To the Local Committee constituted by the District Officer for the district concerned, as provided in Section 6 of the Act.

If the complaint concerns the designated complaints contact or a member of the Internal Committee, it should be sent directly to the Presiding Officer or, if it concerns the Presiding Officer, to any other member of the Committee.

7.2 What a complaint should contain

The complaint should describe what happened, when and where it happened, the name of the respondent, and the names of any witnesses, together with any supporting documents, messages or screenshots. A suggested format is provided in **Annexure A**. Where the complaint is submitted on paper, it should be accompanied by six copies, as required under the Rules. Where a person is unable to make a complaint in writing, the Presiding Officer or any member of the Committee will provide all reasonable assistance to put it in writing.

7.3 Time limit

A complaint should be made within **three months** from the date of the incident and, in the case of a series of incidents, within three months from the date of the last incident. The Internal Committee may extend this time limit by up to a further three months, for reasons to be recorded in writing, if it is satisfied that circumstances prevented the person from making the complaint within the original period. People are encouraged to come forward as early as possible.

7.4 Complaint made on behalf of the aggrieved person

Where the aggrieved person is unable to make a complaint on account of physical or mental incapacity or death, or for any other reason, a complaint may be made on her behalf by the persons specified in the Act and the Rules, such as a relative, friend, co-worker or any other person who has knowledge of the incident, with the written consent of the aggrieved person where required.

> Making a complaint under this Policy does not affect any person's right to file a complaint with the police or to pursue any other remedy available under law. The Company will support a complainant who chooses to do so.

8. Conciliation

Before initiating an inquiry, and only at the request of the aggrieved woman, the Internal Committee may take steps to settle the matter between her and the respondent through conciliation. No monetary settlement may be made the basis of conciliation. Where a settlement is arrived at, the Committee will record it and forward it to the Company for action, and will provide copies to both parties; no further inquiry will then be conducted. If the terms of the settlement are not complied with by the respondent, the aggrieved woman may inform the Committee, which will proceed with an inquiry.

9. Inquiry procedure

The Internal Committee will conduct every inquiry in a fair, impartial and sensitive manner, in accordance with the principles of natural justice and the procedure in the Act and the Rules. In particular:

1. The Committee will send a copy of the complaint to the respondent within seven working days of receiving it.
2. The respondent will file a reply, along with any documents and the names and addresses of witnesses, within ten working days of receiving the complaint.
3. Both parties will be given a fair opportunity to be heard and to present evidence, and each will be given a copy of the findings. Hearings may be held in person or by video, and the Committee may hear the parties separately to protect the complainant from intimidation.
4. The parties may not be represented by a legal practitioner at any stage of the proceedings before the Committee.
5. The Committee has the powers of a civil court, as provided in the Act, for summoning and examining any person on oath and requiring the discovery and production of documents.
6. If either party fails, without sufficient cause, to appear for three consecutive hearings, the Committee may terminate the proceedings or give an ex parte decision, after giving fifteen days' written notice to the party concerned.
7. The Committee will complete the inquiry within **ninety days** of receipt of the complaint.

10. Interim relief during the inquiry

During the pendency of an inquiry, on a written request from the aggrieved woman, the Internal Committee may recommend that the Company:

- transfer the aggrieved woman or the respondent to another team, project or workplace;
- grant the aggrieved woman leave of up to three months, which will be in addition to the leave to which she is otherwise entitled; or
- restrain the respondent from reporting on the work performance of the aggrieved woman or from supervising her work, and assign that responsibility to another person.

The Company will implement the Committee's recommendations for interim relief and inform the Committee accordingly.

11. Findings and action

The Internal Committee will provide its inquiry report, with findings and recommendations, to the Company within **ten days** of completing the inquiry, and will make the report available to both parties.

- If the allegation is not proved, the Committee will recommend that no action is required in the matter.
- If the allegation is proved, the Committee will recommend action for sexual harassment as misconduct. Depending on the seriousness of the conduct, such action may include a written apology, warning, reprimand or censure, withholding of promotion, pay rise or increments, counselling, community service, or termination of employment or engagement.
- The Committee may also recommend that an appropriate sum be deducted from the respondent's salary or wages, or be paid by the respondent, as compensation to the aggrieved woman, having regard to the factors set out in Section 15 of the Act, including mental trauma, loss of career opportunity, medical expenses and the financial status of the respondent.

The Company will act on the recommendations of the Committee within **sixty days** of receiving the report.

12. Malicious or false complaints

The Company recognises that the fear of being disbelieved prevents many people from coming forward. A complaint that cannot be substantiated, or for which adequate proof cannot be provided, will not attract any action against the complainant. However, where the Committee concludes, after inquiry, that a complaint was made with malicious intent or with the knowledge that it was false, or that a complainant produced a forged or misleading document, it may recommend action against the complainant in accordance with Section 14 of the Act. The same applies to a witness who gives false evidence or produces a forged or misleading document. Malicious intent must be established through the inquiry before any such action is recommended.

13. Appeal

Any person aggrieved by the recommendations of the Internal Committee, or by the non-implementation of those recommendations, may prefer an appeal to the appropriate appellate authority in accordance with Section 18 of the Act and the Rules, within ninety days of the recommendations.

14. Confidentiality and protection from retaliation

In accordance with Section 16 of the Act, the contents of a complaint, the identity and addresses of the aggrieved woman, the respondent and the witnesses, any information relating to conciliation and inquiry proceedings, the recommendations of the Committee and the action taken by the Company shall not be published, communicated or made known to the public, the press or the media in any manner. Information about the justice secured to a victim may be shared without disclosing names or any particulars that could lead to identification. Any person who breaches confidentiality will be liable to penalty in accordance with Section 17 of the Act and the Rules, and to disciplinary action.

No person who makes a complaint in good faith, assists in an inquiry or appears as a witness shall be victimised, intimidated or discriminated against in any manner. Retaliation will be treated as serious misconduct.

15. Harassment involving third parties

The Company's work takes its people into client offices, partner organisations and communities, and brings clients, partners, donors and beneficiaries into contact with its people. Accordingly:

- Where a Company employee, associate or field investigator is sexually harassed by a third party, such as a client or partner employee, a vendor, a donor or a community member, the Company will take all steps within its power to support them. This may include raising the matter with the third party's organisation and its Internal Committee, withdrawing or reassigning staff from the engagement, and assisting them to file a complaint with the police or other authority if they so choose.
- Where a client or partner employee, donor, beneficiary, community member or research participant alleges sexual harassment by a person engaged by the Company, the complaint will be dealt with by the Company's Internal Committee under this Policy, and the Company will cooperate fully with any process of the third party's organisation.
- Where an allegation involves a child, it must also be reported immediately under the Company's Child Protection Policy, and the Company will comply with its legal obligation to report it to the police or the Special Juvenile Police Unit.

The Company will include obligations on the prevention of sexual harassment in its contracts with field agencies, associates and vendors, and will consider the existence of a functioning complaints mechanism when it carries out due diligence on NGO partners.

16. Awareness, training and records

- Every new employee, intern and associate will be briefed on this Policy within thirty days of joining, and field investigators will be briefed before deployment.
- All employees will attend an awareness session at least once a year, and members of the Internal Committee will receive orientation and skill-building at least once a year.
- The names of the Internal Committee members and the complaint channels will be circulated to all staff, published on the intranet and on the Company website, and updated whenever they change.
- The Internal Committee will prepare an annual report, in the form prescribed in the Rules, and submit it to the Company and to the District Officer. The report will set out the number of complaints received, disposed of and pending, and the workshops and awareness programmes carried out.
- The Company will disclose the constitution of the Internal Committee and the number of complaints in its Board's report, as required under the Companies Act, 2013 and the rules made under it.
- All records of complaints and proceedings will be maintained securely by the Presiding Officer, with access limited to members of the Committee.

17. Review

Human Resources, in consultation with the Internal Committee, will review this Policy annually and recommend changes to the Managing Director. The composition of the Internal Committee will be reviewed whenever a member leaves the Company or completes their term.

Annexure A: Suggested complaint format

A complaint does not need to follow this format to be accepted. It is provided only to help a complainant include the information that the Internal Committee will need.

Name of the complainant	
Designation, team or organisation	
Contact details (phone and email)	
Name and designation of the respondent	
Date(s), time(s) and place(s) of the incident(s), including the platform if online	
Description of what happened	
Names and contact details of any witnesses	
Supporting documents, messages or screenshots attached (list)	
Interim relief requested, if any	
Signature and date	

Annexure B: Summary of timelines

Step	Timeline
Filing of complaint	Within 3 months of the incident or the last of a series of incidents; extendable by up to 3 months for recorded reasons
Forwarding by the designated complaints contact	Within 1 working day of receipt
Copy of complaint to respondent	Within 7 working days of receipt by the Committee
Reply by respondent	Within 10 working days of receiving the complaint
Completion of inquiry	Within 90 days of receipt of the complaint
Inquiry report to the Company and the parties	Within 10 days of completion of the inquiry
Action by the Company	Within 60 days of receiving the report

Step	Timeline
Appeal	Within 90 days of the recommendations