

Policy for Prevention of Sexual Harassment @ Workplace
for
DroneAcharya Aerial Innovations Ltd
under
The Sexual Harassment of Women at Workplace (Prevention, Prohibition and
Redressal) Act, 2013

Trigger Warning: This document contains information on physical violence, sexual violence, abuse, and slurs which some readers may find disturbing. However, the Nobel objective of this document is to educate the employee to empower & make aware them to protect themselves and others against discrimination and harassment based on sex of the person

Revision History

Sr.	Date	Ver #	Changes made
1.	29 Aug 22	1.0	Initial Version. Policy adopted and implemented
2.	28 Sep 22	1.1	Change in name of company and registered office address
3.	15 Nov 22	1.2	Company Logo with TM is replaced by company logo with [®] Change in name of Presiding Officer of IC Contact details of IC team added (email and phone number)
4.	31 Aug 23	1.3	Internal committee updated for new members
5	10 Oct 23	1.4	Committee member Ms. Mukula's name has been replaced by new member Ms. Suvarna
6.	14 Oct 24	1.5	Presiding officer Ms. Sapna Sharma is replaced by Ms. Alina Usmani
7.	01 Sep 25	1.6	Presiding officer Ms. Alina Usmani is changed by Ms. Shubhangi Yeole.

Introduction

DroneAacharya Aerial Innovations Ltd. (hereinafter "Company" / "Employer") is an equal employment opportunity company and is committed to create a healthy working environment that enables employees to work without fear of prejudice, gender bias and harassment free workplace to all employees without regard to race, caste, religion, colour, ancestry, marital status, gender, age, nationality, ethnic origin, or disability. The Company also believes that all employees have the right to be treated with dignity.

Sexual harassment at the workplace is a grave offence and is therefore punishable. This Policy extends to all employees of DroneAacharya Aerial Innovations Ltd. at all locations and group companies (current or future). This version of the policy is effective from 29 Aug 2022 and supersedes all prior policies and communication (if any) on this or related subject.

Sexual harassment at the workplace results in violation of the fundamental rights of a person;

- to equality under Articles 14 and 15 of the Constitution of India
- to life and to live with dignity under article 21 of the Constitution
- to practice any profession or to carry on any occupation, trade or business which includes a right to a safe environment free from sexual harassment.

Protection against sexual harassment and the right to work with dignity are universally recognised human rights by international conventions and instruments such as Convention on the Elimination of all Forms of Discrimination against Women, which has been ratified on 25 June 1993 by the Government of India.

Objective of this policy, drafted and adopted under The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (also commonly called as POSH) is to help survivors of sexual harassment and to secure a safe work environment for everyone and enable all employees to act against sexual harassment by a colleague, visitor, or anyone else at a workplace.

This policy document focusses mainly on the POSH Act and other relevant laws in India pertaining to workplace sexual harassment. Further, the objective is to create more awareness on the issue and simultaneously equip employer in providing women a safe and secure working environment.

This policy document also discusses the importance of 'prevention' as the best tool for elimination of this menace in a multi-cultural society as ours.

This policy document helps those who have faced sexual harassment at the workplace to navigate the legal process in such situations. The document clarifies legal aspects including what constitutes sexual harassment, remedies, or safeguards available to the survivor, investigation procedure, punishments, etc.

While the Act is not gender neutral, companies may extend the policy to

cover all employees, irrespective of their gender, under their POSH Policies. Thus, DroneAacharya Aerial Innovations Ltd. has extended this policy to any gender. This will ensure protection of all the employees from such instances. Thus, at DroneAacharya Aerial Innovations Ltd., this policy is applicable for all the male, female and trans employee who identifies himself/herself with male/female gender.

Further, no employee should have reasonable grounds to believe that he/she is disadvantaged in connection with his/her employment.

1. What amounts to Sexual Harassment?

The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 defines 'sexual harassment' in line with the Supreme Court's definition of 'sexual harassment' in the Vishaka Judgment (<https://main.sci.gov.in/jonew/judis/13856.pdf>). As per the POSH Act, 'sexual harassment' includes unwelcome sexually tinted behaviour, whether directly or by implication, such as;

- (i) physical contact and advances
- (ii) demand or request for sexual favours
- (iii) making sexually coloured remarks
- (iv) showing pornography
- (v) any other unwelcome physical, verbal, or non-verbal conduct of a sexual nature.

The following circumstances, among other circumstances, if they occur or are present in relation to or connected with any act or behaviour of sexual harassment may amount to sexual harassment:

- A. Physical Contact & Advances
 - 1. Forceful or unwanted, unnecessary physical touch, physical assault, or molestation
 - 2. Forceful and repeated invitations for dates
 - 3. Forceful or unwanted kisses or hugs
 - 4. Unwanted, unwarranted touching of any body part
 - 5. Stopping or blocking movements within a workspace
 - 6. Sitting too closely and making you feel uncomfortable (if you move away the person moves closer to you again).
- B. Sexual Favours
 - 1. A demand or request for sexual favours
 - 2. Any favour or advantage granted in return for a sexual favour from you Note: Sexual favours could mean requests for lewd conversations, interactions, engaging in perverse talks, entertaining similar conversations, and the actual physical act of indulging with a person sexually
- C. Sexually Coloured Remarks
 - 1. Derogatory comments about your body or dress, slurs, epithets, or sexually suggestive jokes
 - 2. Comments on your personal life with sexual undertones
 - 3. Subtle innuendos or open taunting about your physical appearance or body shape

4. Sexual metaphors, obscene jokes, or jokes causing or likely to cause awkwardness or embarrassment
 5. Making sexual gestures like leering, whistling, staring
 6. Gender-based insults and/or sexist remarks
 7. Eve-teasing
 8. Stalking, whether physically or on social media
 9. Repeated friend requests on your social media
 10. Calling you persistently at odd hours or beyond working hours
 11. Insisting on your video mode to be always turned on in virtual meetings, even when company rules do not require it
 12. Persistent questions about your personal life
 13. Calling you names such as 'sweetie', 'darling' or 'honey'
 14. Making someone expose their private parts to you or repeatedly staring at your body parts
 15. Written communications of a sexual nature distributed in hard copy or via a computer network, suggestive or obscene letters, notes, or invitations
 16. Text messages or emails which are sexual in nature.
- D. Showing Pornography or Other Sexually Offensive or Derogatory Material
1. Displaying sexually suggestive objects or pictures, cartoons, calendars, or posters
 2. Sending nude pictures or pornography
 3. Showing lewd images or jokes or offensive material to anyone in your presence
 4. Sharing lewd images or jokes or offensive material on company/team Whatsapp groups or on virtual meetings.
- E. Quid Pro Quo
- Indirect or direct promises of benefits to an employee in return for sexual favours, also known as Quid Pro Quo. Quid pro quo (literal meaning "this for that") is an exchange proposition that may reflect in one or more of the following situations;
1. Hiring
 2. Payment of salary or compensation
 3. Promotion
 4. Retention decision
 5. Relocation or transfer
 6. Allocation of job, responsibility, or work
- F. Indirect or Direct Threats to Harm Employment Unless Sexual Favours/Dates Are Granted, Including
1. Loss of promotion
 2. Loss of employment
 3. Negative performance evaluation
 4. Undesirable work allocation
 5. Denial of equal opportunities
- G. Hostile Work Environment
- Sexual harassment at workplace is not limited to one single situation, experience, or incident. The entire experience of a woman's experience at work over a short/long period of time can be created as an environment which is hostile towards her as a

specific person of a gender. This may reflect in the form of interference with work or creating an intimidating, offensive, or hostile work environment through;

1. Lewd, unwanted acts including sexually coloured remarks, staring, forcible physical contact
 2. Displaying pornography
 3. Gender-based insults or sexist remarks
 4. Not including a person in projects or meetings on account of gender
 5. Refusing to acknowledge someone's presence in meetings or work on account of gender
 6. Sexist comments during meetings (including virtual meetings).
- H. Humiliating Treatment Likely to Affect an Employee's Health or Safety, Such As
1. Physical confinement or behaviour which violates privacy
 2. Creating a work environment where the situation forces a woman to be in an uncomfortable and inappropriate company of a male colleague or associate
 3. Making queries and gossip related to a woman's private and personal life.

Sexual harassment must occur at a 'workplace' and can happen inside your workplace, in the cafeteria, any common rooms, etc. This also includes an 'extended workplace,' meaning any place that you visit for work or during your employment. For example, you can complain if you face sexual harassment in transportation provided by your employer for commuting to and from the place of work, external conference avenues, etc.

2. Who can complain against sexual harassment @workplace?

The law states that the complainant should be a woman. Also, the Transgender Persons (Protection of Rights) Act, 2019 clarified that any person associated with a workplace who identifies themselves as a woman, is eligible to file a complaint under the POSH law. A complaint can be filed against a person of any gender.

Recently, the Calcutta High Court clarified that same-gender complaints are allowed under the POSH law. The Court held that people of the same gender could complain of sexual harassment against each other.

All employees, regardless of whether they are working for a salary, on a voluntary basis or otherwise have a right to complain under the POSH law. Further, if any woman visiting an organisation gets harassed by any of the employees of such organisation, she can file a complaint with the Internal Committee of that organisation.

POSH complaints can be filed by;

1. Domestic workers
2. Regular employees
3. Temporary employees

4. Employees hired for a specific purpose
5. Daily wage employees
6. Contractual employees
7. Employees on probation
8. Employees from agencies
9. Trainees and apprentices.
- 10 Interns

The law also makes provisions for friends, relatives, co-workers, psychologist & psychiatrists, etc. to file the complaint in situations where the aggrieved woman is unable to make the complaint on account of physical incapacity, mental incapacity, or death.

3. To whom to make complaint

'Internal Committee' (IC) has been constituted by the company to address all the complaints of sexual harassment. The members of IC are,

Sr.	Name of IC Member	Email id	Phone No
1.	Ms. Shubhangi Yeole (Presiding Officer)	shubhangi@droneacharya.com	9960142399
2.	Ms. Alina Usmani (Internal Member)	alina@droneacharya.com	9087860867
3.	Ms. Suvarna Sanglikar (Internal Member)	suvarna@droneacharya.com	7208594596
4.	Mr. Amit Takte (Internal Member)	amit@droneacharya.com	9766251965
5.	Adv. Sadanand Sonar (External Member)	sadanand@lexwin.co.in	9823385085

The committee will be responsible for;

1. Receiving complaints of sexual harassment at the workplace
2. Initiating and conducting inquiry as per the established procedure
3. Submitting findings and recommendations of inquiries
4. Coordinating with the Company in implementing appropriate action
5. Maintaining strict confidentiality throughout the process as per established guidelines
6. Submitting annual reports in the prescribed format

The Rajasthan High Court held that the aggrieved woman can file a complaint with the IC without having to submit the complaint in person. The complaint could be sent to the IC through another person or by any other media, the main point being that it should be received by the IC.

4. How can you complain against sexual harassment?

Page 8 of 14

Complaint is to be filed in prescribed format. While you may be aggrieved and in a lot of emotional trauma at the time of filing the complaint, it is crucial that you provide the following details as specifically as possible;

1. Name of the Respondent, their place of work, and designation
2. Details of the incident/s (as explanatory as possible). No detail is irrelevant
3. Dates of each incident mentioned
4. Place where the incident/s happened
5. Relief that you want from the employer, including transferring the accused

Notes on complaint filling

1. The complaint must be submitted within three months from the date of the incident. If there are a series of incidents, it should be submitted within three months from the date of the last incident
2. If there is sufficient reason for a delay in filing the complaint, the IC may extend the time for filing the complaint by an additional three months, after recording the reasons for the extension in writing
3. Submit the written complaint and any supporting documents along with the witnesses' names and addresses to the IC. You can add as many documents as possible in any format i.e., relevant emails, screenshots of SMSs/Whatsapp messages, call details, photographs, recordings, etc., to the complaint.

5. Conciliation

Before initiating action on a complaint, the IC on the request and/or consent of the aggrieved woman, can make efforts to settle the matter between the parties through conciliation by bringing about an amicable settlement. Conciliation is basically an informal method of resolving complaints before the complaint escalates into a fully blown formal inquiry. Thus, after a complaint of sexual harassment has been lodged, the aggrieved woman may request the IC to resolve the matter by conciliating between the parties before commencement of the inquiry proceedings, although monetary settlement should not be made as a basis of conciliation.

Once the settlement has been arrived at, the IC shall record the settlement arrived at and thereafter provide copies of the settlement to the aggrieved woman as well as the respondent. Once a settlement has been arrived at, the IC shall not proceed with an inquiry under the POSH Act.

Further, if the process works and if a settlement is arrived at, the IC must record the settlement arrived at and forwards the same to the employer. The IC is also supposed to provide a copy of the settlement of to the aggrieved woman and the accused.

6. Interim reliefs

At the request of the complainant, the IC may recommend to the

employer to provide interim measures such as;

1. transfer of the aggrieved woman or the respondent to any other workplace
2. granting leave to the aggrieved woman up to a period of 3 months in addition to her regular statutory/ contractual leave entitlement
3. restrain the respondent from reporting on the work performance of the aggrieved woman or writing her confidential report, which duties may be transferred to other employees.

7. Punishment & compensation

The POSH Act prescribes the following punishments that may be imposed by an employer on an employee for indulging in an act of sexual harassment;

1. punishment prescribed under the service rules of the organization
2. Disciplinary action including written apology, warning, reprimand, censure, withholding of promotion, withholding of pay rise or increments, terminating the respondent from service, undergoing a counselling session, or carrying out community service
3. deduction of compensation payable to the aggrieved woman from the wages of the respondent

The POSH Act envisages payment of compensation to the aggrieved woman. The compensation payable shall be determined based on;

1. the mental trauma, pain, suffering, and emotional distress caused to the aggrieved employee
2. the loss in career opportunity due to the incident of sexual harassment
3. medical expenses incurred by the victim for physical/ psychiatric treatment
4. the income and status of the alleged perpetrator
5. feasibility of such payment in lump sum or in instalments. If the respondent fails to pay the aforesaid sum, IC may forward the order for recovery of the sum as an arrear of land revenue to an appropriate authority.

The proportionality of the consequences and punishment decided for allegation/set of allegations vary on various factors. IC's are required to consider aspects pertaining to the authority/seniority of the perpetrator, duration, frequency, degree of offence, category, and ONLY at the end of an independent investigation decision, may also incorporate if there are any prior warnings given to the perpetrator.

8. Frivolous complaints

To ensure that the protections envisaged under the POSH Act are not misused, provisions for action against "false or malicious" complainants have been included in the statute. As per the POSH Act, if the IC concludes that the allegation made by the complainant is false or malicious or the complaint has been made knowing it to be untrue or forged or misleading information has been provided during the inquiry, disciplinary action in accordance with the service rules of the organisation can be taken against such complainant.

Statute provides that disciplinary action such as written apology, warning, reprimand, censure, withholding of promotion, withholding of pay rise or increments, terminating the respondent from service, undergoing a counselling session, or carrying out community service may be taken. The POSH Act further clarifies that the mere inability to substantiate a complaint or provide adequate proof need not mean that the complaint is false or malicious.

9. Timeline for addressing the complaint

Given below is the timeline for addressing complaints;

1. When the IC receives the complaint, it should send one copy of the complaint to the accused within seven working days
2. The accused should reply to the complaint along with a list of supporting documents and names and addresses of witnesses within ten working days
3. The IC's inquiry must be completed within ninety days of receiving the complaint
4. The IC must make the inquiry report within ten days of completing the inquiry
5. The employer must act on the IC's recommendations within sixty days of getting the inquiry report.
6. Anyone not satisfied with the IC's decision can appeal against the decision within ninety days.

10. Employer's duties and obligations

"Prevention is better than Cure" - In addition to requiring an employer to set up an IC and ensure redressal of grievances of workplace harassment in a time bound manner, the POSH Act casts certain other obligations upon an employer which includes;

1. Promoting a gender sensitive workplace and removing the underlying factors that contribute towards creating a hostile working environment against women
2. provide a safe working environment
3. formulate and widely disseminate an internal policy or charter or resolution or declaration for prohibition, prevention, and redressal of sexual harassment at the workplace
4. display conspicuously at the workplace, the penal consequences of indulging in acts that may constitute sexual harassment and the composition of the IC
declare the names and contact details of all members of the IC
5. provide necessary facilities to the IC for dealing with the complaint and conducting an inquiry;
 1. provide assistance to the aggrieved woman if she so chooses to file a complaint in relation to the offence under the IPC or any other law for the time being in force
 2. treat sexual harassment as a misconduct under the service rules and initiate action for misconduct
 3. prepare an annual report with details on the number of cases filed and their disposal
 4. monitor the timely submission of reports by the IC.

11. Confidentiality

Recognising the sensitivity attached to matters pertaining to sexual harassment, the POSH Act attaches significant importance to ensuring that the complaint and connected information are kept confidential. The POSH Act specifically stipulates that information pertaining to workplace sexual harassment shall not be subject to the provisions of the Right to Information Act, 2005.

The POSH Act further prohibits dissemination of the contents of the complaint, the identity and addresses of the complainant, respondent, witnesses, any information relating to conciliation and inquiry proceedings, recommendations of the IC and the action taken to the public, press and media in any manner. That said, the POSH Act allows dissemination of information pertaining to the justice that has been secured to any victim of sexual harassment, without disclosing the name, address, identity, or any other particulars which could result in the identification of the complainant or the witnesses.

Not only deter other individuals from engaging in acts of sexual harassment, but also instil in the minds of employees and public that the employer is serious about providing a safe work environment and harbours zero tolerance for any form of sexual harassment at the workplace.

Breach of the obligation to maintain confidentiality by a person entrusted with the duty to handle or deal with the complaint or conduct the inquiry, or make recommendations or take actions under the statute, is punishable in accordance with the provisions of the service rules applicable to the said person or where no such service rules exist, a fine of INR 5,000 shall be applied.

12. Alternative complaint options

Apart from the IC in your workplace, you can file a sexual harassment complaint with any of the following authorities:

1. Police

Sexual harassment violates not only the POSH law but also the Indian Penal Code, 1860 (IPC), which criminalizes offences such as outraging a woman's modesty, sexual harassment by a man, assaulting a woman with the intention to disrobe, voyeurism, stalking, and insulting the modesty of a woman.

2. National Commission for Women & State Commissions for Women

Complaints can be filed online, via post, and in person with the National or State Commissions for Women.

3. "She-Box" By Ministry of Women & Child Development (WCD)

"SHe-Box" is an online complaint platform by the Indian Ministry of Women and Child Development ("WCD"). SHe-Box allows female employees or visitors to raise complaints of sexual harassment at the workplace. It is a platform

available for both the private sector and public sector. It aims at providing speedy redressal of sexual harassment complaints.

If a formal complaint is lodged with SHe-Box, based on an assessment of the complaint, the WCD will direct the complaint to the employee's IC. The WCD also monitors the progress of inquiry conducted by the IC and keeps the complainant updated. Any information given on this platform is kept confidential.

13. Roles and responsibilities of other employees

It is the responsibility of all to respect the rights of others and to never encourage harassment. It can be done by;

1. Refusing to participate in any activity which constitutes harassment
2. Supporting the person to reject unwelcome behaviour
3. Acting as a witness if the person being harassed decides to lodge a complaint.

14. Some Definitions

- 1 Aggrieved woman: In relation to a workplace, a woman, of any age, whether employed or not, who alleges to have been subjected to any act of sexual harassment by the respondent.
- 2 Complainant: Any aggrieved woman who makes a complaint alleging sexual harassment under this policy
- 3 Respondent: A person against whom a complaint of sexual harassment has been made by the aggrieved woman under this policy
- 4 Employee: A person employed at the workplace, for any work on regular, temporary, ad-hoc or daily wage basis, either directly or through an agent, including a contractor, with or without the knowledge of the principal employer, whether for remuneration or not, or working on a voluntary basis or otherwise, whether the terms of employment are express or implied and includes a co-worker, a contract worker, probationer, trainee, apprentice or called by any other such name.
- 5 Workplace: Premises, locations, establishments, enterprises, institutions, offices, branches, canteens, or units established, subsidiaries which are controlled by the Company. Places visited by the Employee arising out of or during employment including official events, accommodation and transportation provided by the employer for undertaking a journey.

Employee Declaration

There is no need of explicit consent from employee on binding to this policy. The POSH Act being law of land is binding and obligatory to all (employee and employer). Absence of consent from employee shall never be defence available to the respondent as well as survivor of harassment as far as provisions of this policies are concerned.

I, [Name of employee](#) have read and understood this POSH policy document. After reading this policy document I am aware of what constitute as "Sexual Harassment", available complaint mechanism, remedies, and punishment as per POSH Act. Sexual

Page 13 of 14

Harassment being violation of Fundamental Right of other person, I shall neither remotely be connected to Sexual Harassment nor I will encourage or conceal other(s) if I notice anyone is perpetrator or is a victim of it.

Name:

Place:

Date:

<**Note:** This declaration can be sent to HR by an email with this text above. Your email with text above shall be treated as your declaration received appropriately>

*** End of Policy Document ***