

POLICY ON PREVENTION, PROHIBITION AND REDRESSAL OF SEXUAL HARASSMENT AT THE WORKPLACE (POSH)

SONY PICTURES NETWORKS INDIA PRIVATE LIMITED

BANGLA ENTERTAINMENT PRIVATE LIMITED

MSM-WORLDWIDE FACTUAL MEDIA PRIVATE LIMITED

Document Control

Policy	Policy on prevention, prohibition and redressal of sexual harassment at workplace ("POSH")
Issued By	Legal Department

History

Version	Date	Reason for change	Owner/prepared by	Approved by
Version 1	01-Jan-14	Committee constituted	Dipti Kotak	Ashok Nambissan
Version 2	01-Jul-16	Made applicable to all SPN legal entities.	Dipti Kotak	Ashok Nambissan
Version 2.1	01-Jan-17	Reconstituted ICC	Sapna C/ Dipti Kotak	Ashok Nambissan
Version 2.2	01-Nov-17	ICC Members changed, added SPND	Sapna C/ Dipti Kotak	Ashok Nambissan
Version 2.3	01-Apr-18	ICC Members changed	Rajkumar Bidawatka	Ashok Nambissan
Version 2.4	01-Sep-18	ICC named as IC	Rajkumar Bidawatka	Ashok Nambissan
Version 2.5	01-Apr-19	Formed IC for Gurgaon	Rajkumar Bidawatka	Ashok Nambissan
Version 2.6	09-Jan-2020	Reconstituted IC	Rajkumar Bidawatka	Ashok Nambissan
Version 2.7	03-May-2021	Reconstituted IC	Rajkumar Bidawatka	Ashok Nambissan
Version 2.8	29-June-2022	Reconstituted IC, changed SPN as CME	Rajkumar Bidawatka	Ashok Nambissan
Version 2.9	09-March-2023	Reconstituted IC	Rajkumar Bidawatka	Ashok Nambissan
Version 3.0	27-June-2024	Reconstituted IC, Definition inclusion and modification	Rajkumar Bidawatka	Ashok Nambissan
Version 3.1	01-April-2025	Reconstituted IC	Rajkumar Bidawatka	Ritesh Khosla
Version 3.2	21-April-2026	Reconstituted IC	Rajkumar Bidawatka	Ritesh Khosla

Statement of Intent

The Company (defined below) is committed to maintain a work environment for its Employees (defined below) that is free from all forms of Sexual Harassment (defined below). The Company follows a zero-tolerance policy towards Sexual Harassment at the Workplace (defined below).

1. Definitions

“Aggrieved Employee” means an Employee who has been subjected to any form of sexual harassment and files a formal written complaint of Sexual Harassment to the Internal Committee in accordance with the procedures set out under this Policy.

“Respondent” means the person against whom the Complainant has made a complaint.

“Committee” means the Internal Committee mentioned in point 5 below.

“Company” means and includes: -

- Sony Pictures Networks India Private Ltd & *its branch and other office(s)*;
- *Bangla Entertainment Pvt. Ltd. & its other office(s)*; **and**
- *MSM-Worldwide Factual Media Pvt. Ltd. & its other office(s)*.

“Disciplinary Action” shall mean all actions and punishments initiated under this Policy against an Offending Employee and/or an Employee who has made a false or malicious complaint of Sexual Harassment against another Employee and shall include, but not be limited to, (i) enquiry by the Committee, and/or (ii) imposition of Punishment on the Respondent and/or (iii) imposition of Punishment on the Aggrieved Employee in case of a false or malicious complaint.

“Employee” means any person employed directly or indirectly, by the Company including persons employed on a regular, temporary, daily wage or *ad hoc* basis, whether employed 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. This includes those employed without the knowledge of the Company; those employed either directly or through an agent including a contractor.

“Offending Employee” means an Employee who has been held guilty of the charges levied against such employee by the Aggrieved Employee.

“Policy” means this Policy on prevention, prohibition and redressal of sexual harassment at workplace (“POSH”)

“Punishment” shall mean (i) punishment imposed by the Company on an Offending Employee who has been found guilty by the Committee and/or (ii) punishment imposed by the Company on an Aggrieved Employee who has made false or malicious complaint of Sexual Harassment against another Employee, and may include, but is not limited to: warning, oral reprimand, written reprimand, withholding salary(ies)/wages and incentives, withholding promotion, transfer to any other location or office, suspension from work for such period as may be decided by the Company and/or termination of service, as the case may be.

“Special Educator” means a person trained in communication with people with special needs in a way that addresses their individual differences and needs.

2. Scope and Applicability

This Policy (“**Policy**”) has been formulated in accordance with the laws applicable in India, including but not limited to 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**”) and lays down the procedure/s for making and responding to any complaints of Sexual Harassment.

This Policy shall extend to all Employees of the Company and is incorporated by reference in the Code of Conduct and service conditions of all Employees.

Any non-adherence to this Policy and/or its misuse will be strictly viewed and dealt with as misconduct under the terms of employment, leading to Disciplinary Action including termination of employment.

This Policy aims to protect any Employee who in good faith believes to have been subjected to an act of Sexual Harassment by another Employee at the Workplace

3. What does “Sexual Harassment” mean

“**Sexual Harassment**” means and includes (but is not limited to) any one or more of the following unwelcome acts or behavior (whether directly or by implication) namely:

- Any physical contact and/or advances in a way that may make an Employee feel uncomfortable, including but not limited to patting, pinching or intentional brushing against another’s body;
- A demand or request for sexual favours;
- Leering, i.e., staring in a sexually suggestive manner;
- Making sexually coloured remarks, about looks, clothing, body parts;
- Telling sexual or lewd jokes, hanging obscene posters, making obscene gestures, etc.;
- Teasing, innuendos and taunts having sexual overtones;
- Showing pornography;
- Sending, forwarding or soliciting sexually suggestive letters, notes, emails, text messages, images, instant messages including via Facebook, X (formerly Twitter), WhatsApp, Instagram or any other medium;
- Any other unwelcome physical, verbal or non-verbal conduct of a sexual nature;
- Unwelcome social invitations, with sexual overtones commonly understood as flirting;
 - Persistently asking someone out, despite being turned down.
 - Stalking individual and/ or eve teasing.
- Any act of a sexual nature by an Respondent which interferes with an Aggrieved Employee’s work or creates an intimidating, offensive or hostile work environment or humiliating treatment which might affect the physical/mental health and/or safety and/or reasonable apprehension about the career prospects of the Employee who is subjected to such acts; and/or

- Any of the above acts coupled with the implied or explicit promise of preferential treatment, or threat of detrimental treatment, or threat about present/future employment status for sexual favours.

4. Prohibition of Sexual Harassment at the Workplace

- No Employee shall be subjected to Sexual Harassment in the discharge of their official duties by another Employee at the Workplace. Sexual Harassment, whether overt or subtle or quid pro quo creates a hostile work environment and is strictly prohibited by Company Policy.
- Individuals engaged in behaviour that qualifies as Sexual Harassment as per point 3 above will be held personally liable for such conduct and the Company reserves the right to take appropriate Disciplinary Action as set out in this Policy.
- For the purposes of this Policy, it is clarified that “**Workplace**” will include the office premises, as well as any place visited by the Employee (including remote work places) arising out of or during the course of employment, including and not limited to transportation provided by the Company for undertaking any journey, Company off sites and official conferences.

5. Internal Committee

The Company has constituted an Internal Committee for all the Company’s offices in India (except the Gurugram office). The Presiding Officer and Other Members of this Committee are as under:

“Committee” shall mean the Internal Committee for all the offices of the Company in India (except the Gurugram office) and Internal Committee for Gurugram office, as the context may require.

Sr. No	Name	Designation	Location	Email
1	Shaeesta Naqvi	Chairperson	All India Committee	shaeesta.naqvi@setindia.com
2	Milan Golatkar	Member		milan.golatkar@setindia.com
3	Geeta Prakash Rao	Member		geeta.prakashrao@setindia.com
4	Rajaraman Sundaram	Member		Rajaraman.Sundaram@setindia.com
5	Nachiket Pantvaidya	Member		Nachiket.Pantvaidya@setindia.com
6	Ajay Bhalwankar	Member		Ajay.Bhalwankar@setindia.com
7	Sneha Jaisingh	External Member		Sneha.Jaisingh@bharucha.in

Gurgaon Committee

Sr. No	Name	Designation	Location	Email
1	Shaeesta Naqvi	Chairperson	Gurgaon	shaeesta.naqvi@setindia.com
2	Anurati Tandon	Member		anurati.tandon@setindia.com
3	Tavishi Budhiraja	Member		tavishi.budhiraja@setindia.com
4	Ajay Bhalwankar	Member		Ajay.Bhalwankar@setindia.com
5	Arvind Kopalli	Member		aravind.kopalli@setindia.com
6	Gargi Dabral	Member		gargi.dabral@setindia.com
7	Sneha Jaisingh	External Member		Sneha.Jaisingh@bharucha.in

The Committee is empowered to consider, inquire into and recommend to the Company suitable Disciplinary Action against an Offending Employee who is held to be guilty of the offence of Sexual Harassment.

The Committee will take all reasonable steps to initiate immediate and appropriate action against complaints of Sexual Harassment brought to its notice. The Committee will inquire into the complaint(s) and give a reasonable opportunity of being heard to all the concerned parties.

6. Who can make complaints under this Policy?

The policy is designed to protect every individual from any form of sexual harassment. The Company firmly believes that everyone has the right to work in an environment free from harassment and discrimination, and this policy applies uniformly to all employees, including men, women, and non-binary individuals. In cases of complaint of sexual harassment not covered under the Act, the Committee will act as a disciplinary committee and recommend appropriate actions.

7. Institution of Complaint and Redressal Process

Any Aggrieved Employee who has been/is being subjected to Sexual Harassment may submit their complaint of the alleged incident(s) in writing to any of the members of the Committee, as soon as practicable, but not later than three (3) months from the date of occurrence of the incident amounting to Sexual Harassment (in case of a series of incidents, within a period of three (3) months from the date of the last incident). The Committee may extend the time period by a maximum of 3 (three) more months by recording the reasons for the same if it is satisfied that circumstances were such, which prevented the Aggrieved Employee from making a complaint within the said period. The Aggrieved Employee shall submit to the Committee six copies of the complaint along with the supporting documents and the names and addresses of the witnesses.

- (i) If the Aggrieved Employee is unable to make a complaint on account of physical or mental incapacity, a complaint may be filed by:
 - (a) A relative or friend;
 - (b) A special educator;
 - (c) A qualified psychiatrist or psychologist;
 - (d) The guardian or authority under whose care the Aggrieved Employee is receiving treatment or care; or

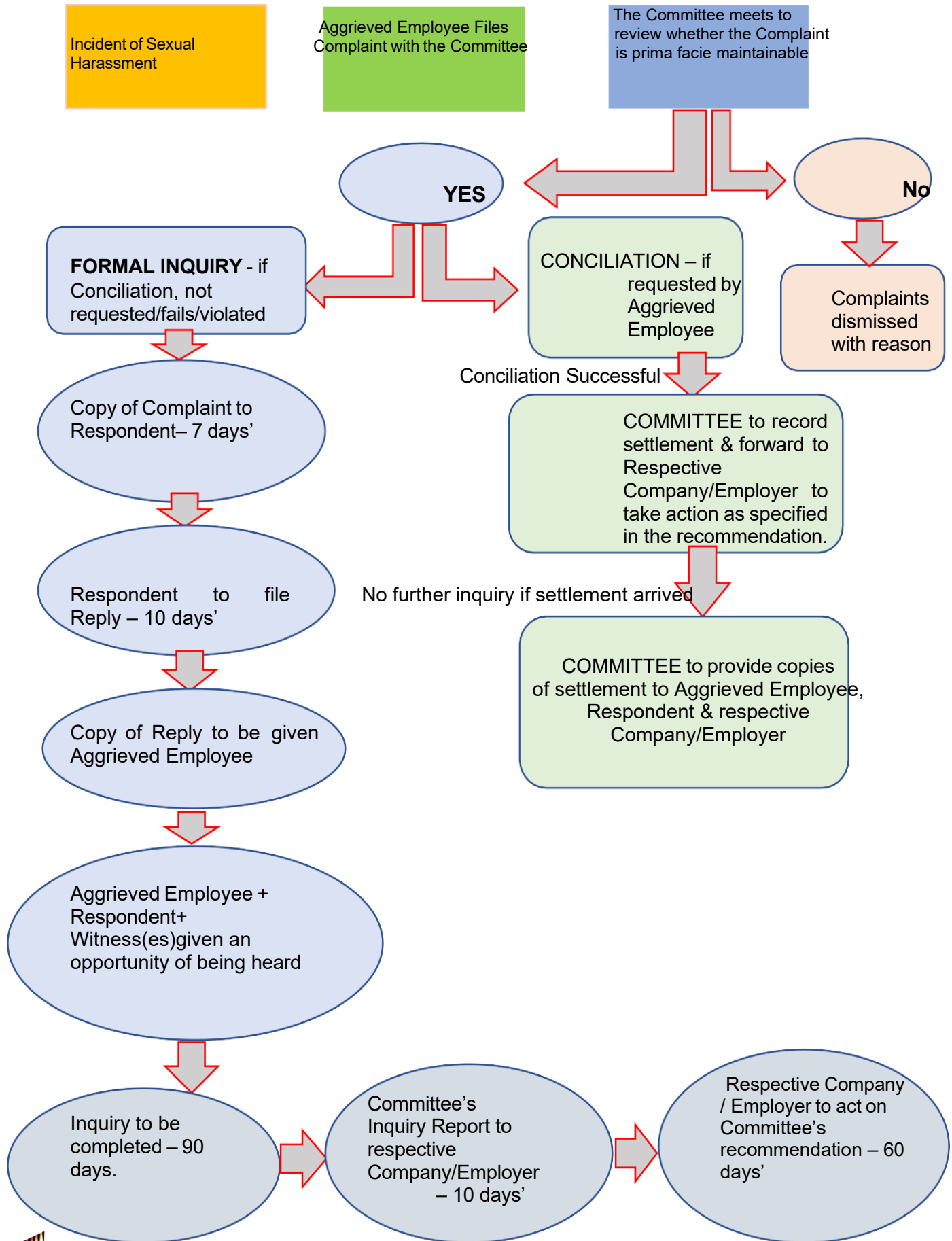
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- (e) Any person who has knowledge of the incident jointly with the Aggrieved Employee's relative, friend, special educator, qualified psychiatrist or psychologist, guardian or authority under whose care the Aggrieved Employee is receiving treatment.
 - (ii) If the Aggrieved Employee is unable to make a complaint for any other reason, a complaint may be filed by any person who has knowledge of the incident, with the Aggrieved Employee's written consent.
 - (iii) An Aggrieved Employee can request the Committee to try and resolve the matter between the Employees through a process of conciliation. If a settlement is reached pursuant to such conciliation, the Committee shall record such settlement and no further inquiry shall be conducted by the Committee. However, if the Aggrieved Employee informs the Committee that any of the terms or conditions of the settlement arrived at through conciliation has not been complied with by the Respondent, the Committee shall then proceed to make an inquiry into the complaint of the Aggrieved Employee.
 - (iv) If conciliation fails to resolve the issue, or if the Aggrieved Employee does not want to resolve the issue through conciliation, the Committee shall proceed to conduct an inquiry into the complaint in accordance with the procedure laid down in this Policy.
 - (v) The Committee shall provide a copy of the complaint to the Respondent within seven days of the receipt of complaint and the Respondent shall submit reply in writing with list of documents, and names and addresses of witnesses to the Committee within ten (10) working days of receipt of the complaint.
 - (vi) In case the Committee arrives at the conclusion that the allegation against the Respondent has been substantiated, it shall recommend to the Company the appropriate Disciplinary Action be taken against the Respondent.

The Company shall take action on the Committee's recommendations within 60 days from the receipt thereof.

- (vii) For the purpose of inquiry, the Committee shall have same powers as are vested in a civil court under the Code of Civil Procedure, 1908 (5 of 1908) when trying a suit in respect of the following matters, namely:
 - The Committee shall make inquiry in accordance with the principles of natural justice. summoning and enforcing the attendance of any person and examining on oath;
 - requiring the discovery and production of documents; and
 - any other matter which may be prescribed.
- (viii) The Committee shall have right to terminate the inquiry proceedings or to give ex-parte decision on the complaint, if the Aggrieved Employee or the Respondent fails, without sufficient cause to represent for three consecutive hearings convened by the Presiding Officer. Provided that such termination or ex-parte order may not be passed without giving a notice in writing, fifteen (15) days in advance.

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- (ix) The parties shall not be allowed to bring any legal practitioner to represent them.
 - (x) The Aggrieved Employee and the Respondent shall have the right of cross-examination of all witnesses. However, such cross-examination shall be conducted in the form of written questions and responses via the Committee only. Neither the Aggrieved Employee nor the Respondent shall have a right to directly cross-examine the other party or witnesses.
 - (xi) The inquiry shall be completed within a period of ninety (90) days.

The institution of complaint and redressal process has been detailed in the following flow chart:



8. Action during pendency of inquiry

- (i) During the pendency of an inquiry, the Aggrieved Employee may make a written request to the Committee to shift the Respondent from the immediate work environment of the Aggrieved Employee. The Committee will evaluate such requests and make recommendations to the Company which will take suitable action as far as practically possible, which may include any of the following measures:
 - transfer the Respondent or the Aggrieved Employee to any other workplace, if practical or possible;
 - grant leave to the Aggrieved Employee for a reasonable period as the Committee shall determine, up to a period of three months; or
 - restrain the Respondent from reporting on the work performance of the Aggrieved Employee (if applicable) and re-assign this responsibility to a senior authority.
- (ii) The Respondent and the Aggrieved Employee may be represented or assisted by a friend or near relative; however, no representation through lawyers or Non-Government Organizations will be permitted by the Company.

9. Punishment for false or malicious complaint and false evidence

- (i) This Policy shall not be used to bring false or malicious complaints against anyone.
- (ii) If the Committee decides that a Sexual Harassment complaint filed by an Employee is malicious and/or false and/or on forged/misleading document(s), it may recommend to the Company to take appropriate Disciplinary Action against such Employee(s). A mere inability to substantiate a complaint or provide adequate proof shall not attract action against the Employee under this clause. The malicious intent on part of the complainant needs to be established in an inquiry before any action is recommended.

10. Confidentiality of Inquiry Proceedings

- (i) All complaints lodged under this Policy shall be strictly confidential.
- (ii) The name and identity of the Aggrieved Employee and/or the Respondent, and witnesses, information relating to conciliation and inquiry proceedings, recommendations of the Committee and actions taken by the Company shall not be published, communicated, or otherwise made known to the public/press/media in any manner. However, information may be disseminated regarding the justice secured to any victim of Sexual Harassment under this Policy without disclosing the name, address, identity, or any other particulars calculated to lead to the identification of the Aggrieved Employee(s), Respondent, and witnesses.

- (iii) The Committee will advise or consult only with those who have a need to know about the allegations, including witnesses who may have knowledge of the circumstances surrounding the allegations and who may be interviewed as a part of the inquiry.
- (iv) If any person entrusted with the duty to handle or deal with the complaint, inquiry or any recommendations or actions under law, or any person who has been involved in an inquiry or otherwise in connection with the complaint, contravenes confidentiality obligation, or retaliates against the Aggrieved Employee, such person shall be liable for penalty in accordance with the provisions of the service rules/Company Policies, as applicable.

11. Third Party Harassment

- (i) Where Sexual Harassment of the Employee occurs as a result of an act or omission by any third party, including the Company's vendors or contract labour deployed by such vendors, customers or a visitor, then the Company shall take all necessary and reasonable steps to assist the Employee to lodge a complaint with the appropriate forum against such third party and/or shall also take action against such third party as per this Policy and the Act and subject to the terms of contract, if any, with the employer of the third party.
- (ii) Where Sexual Harassment occurs as a result of an act or omission by an Employee against a third party including the Company's vendor and/or its employees, customer or a visitor ("External Party") in the course of such Employee's official duties, then the Company shall, take such action against such Employee as may be appropriate based on due investigation as per the process set out under this Policy and the Act and subject to the terms of contract, if any, with the employer of the External Party.

12. Guidelines to Employees on identifying instances of Sexual Harassment

- (i) It is important for Employees to recognize the issue of Sexual Harassment and take appropriate actions to avoid and/or report the same.
- (ii) The Company recommends the following approach to identify/recognize instances of Sexual Harassment. An Employee may answer the following questions to determine the instance of Sexual Harassment:
 - Does the behaviour make me uncomfortable?
 - Does the behaviour violate my dignity as an individual?
 - Does the behaviour violate my right to work in a safe working environment?
- (iii) If the answer to any of the above questions results in a "Yes", then the following actions are recommended:
 - (a) **Being aware of situations:** In uncomfortable situations, the Employee should use appropriate judgment and not hesitate to move from the setting immediately without fear of repercussions. The Employee has the right to refuse to accompany the perpetrator or respond to personal questions if it makes the Employee uncomfortable, but this right should not be exercised to avoid any disciplinary proceedings.

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- (b) **Voicing objections:** Speaking out against Sexual Harassment is an effective tool in combating it, as it highlights the existence of this problem which in turn enables the Company to take effective measures against it. Objecting firmly and clearly to such behavior when it occurs lets the perpetrator(s) know that it is offensive. Sometimes writing a firm letter/email detailing the uncomfortable situation to the Respondent can be more effective than a verbal request. If the Respondent persists in objectionable behavior, a complaint must be made in writing to the Committee.
- (c) **Gathering evidence:** If an Employee has been or is being subjected to Sexual Harassment by another Employee, then keeping a detailed written account of events (including but not limited to dates, times, places, frequency and an account of what has happened), preserving any letters, notes, or other documents received would assist the Committee in its deliberations.
- (d) Employees can also report sexual harassment complaints to the Internal Committee at posh@setindia.com

Disclaimer

This Policy is subject to the provisions of the Act and the Rules framed thereunder and will be reviewed periodically by the Company and shall be subject to change.

For SONY PICTURES NETWORKS INDIA PRIVATE LIMITED



Ritesh Khosla
Executive Director and General Counsel