

Human Resources

Policy Title	:	Prevention of Sexual Harassment at Workplace (POSH) Policy
Policy Number	:	HR-12
Policy Section	:	Human Resources
Policy Owner	:	Vindhya Mathranda, Director, HR India
Last Revised	:	01-Feb-25
Locations	:	Applicable to all CommScope India entities

Objective:

To provide protection against sexual harassment of women at workplace and for the prevention and Redressal of complaints of sexual harassment and for matters connected therewith or incidental thereto

Definitions:

As defined in 'The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013

Eligibility:

- i. Employees on the rolls of CommScope India entities
- ii. Contract Employees
- iii. Trainees who are covered under the Manpower Development Cell Scheme of the Govt. of Goa and Company Trainees

Procedure:

What constitutes sexual harassment

In terms of the provisions of Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 "Sexual harassment" includes any one or more of the following unwelcome acts or behavior (whether directly or by implication) namely:

- Physical contact and advances
- A demand or request for sexual favors
- Sexually coloured remarks
- Showing pornography
- Any other unwelcome physical, verbal or non-verbal conduct of Sexual nature

The following circumstances, among other circumstances, if it occurs or is present in relation to or connected with any act or behavior of sexual harassment may amount to sexual harassment:

- Implied or explicit promise of preferential treatment in her employment; or
- Implied or explicit threat of detrimental treatment in her employment; or
- Implied or explicit threat about her present or future employment status; or
- Interference with her work or creating an intimidating or offensive or hostile work environment for her; or
- Humiliating treatment likely to affect her health or safety.

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Complaints committee

The list of committee members constitutes the following:

- i. A Presiding Officer who shall be a woman employed at a Senior Level at workplace from amongst the Employees. (Provided that in case a Senior Level Woman Employee is not available the Presiding Officer shall be nominated from other officers or administrative units of the workplace)
- ii. Not less than 2 members from amongst employees, preferably committed to the cause of women or who have had experience in social work or have legal knowledge
- iii. One member from amongst nongovernmental organization or associations committed to the cause of women or a person familiar with the issues related to sexual harassment (Provided that at least one half of the total members nominated shall be women)

Complaint

Any aggrieved woman may make in writing a complaint of sexual harassment to the Committee at workplace within a period of three months from the date of the incident and in case of a series of incidents within a period of three months from the last incident.

Where the aggrieved woman is unable to make a complaint on account of her physical or mental incapacity or death or otherwise, her legal heir may institute the complaint on her behalf

Enquiry Procedure:

- i) Soon after registering a complaint, the Chairperson shall issue notice to the parties to the enquiry calling on them to appear before the Committee on the date specified therein.
Provided that no notice shall be issued calling on either party to appear for hearing on a date earlier than three days from the date of notice.
- ii) If the Committee so desires, both parties can be heard separately.
- iii) If the complainant is a third party and the aggrieved is not willing for a personal appearance before the Committee due to any personal reason, the Committee shall proceed with enquiry on the basis of prima facie evidence.
- iv) The Committee after hearing the complainant shall issue charge sheet to the accused calling on him/ her to defend the charges within a date not later than seven days.
- v) The Committee shall record the entire process of hearing duly signed by the parties to the enquiry as token of their acceptance to the record.

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vi) If the Committee so desires, the Committee shall summon, by sending notice in the same manner to any member of the Company, outsider or other to appear before the Committee to give evidence.

vii) The Committee after careful trial shall recommend to the Disciplinary Authority the disciplinary action which the Committee thinks fit.

Protection to complainant:

Reports of sexual harassment are taken seriously and will be dealt with promptly. The specific action taken in any particular case depends upon the nature and gravity of the conduct reported.

The Company recognizes that confidentiality is important. The company will respect the confidentiality and privacy of individuals reporting or accused of sexual harassment to the extent reasonably possible. Reprisals against an individual who in good faith reports or provides information in an investigation about behavior that may violate this policy, are against the law and will not be tolerated. Intentionally providing false information, however, is grounds for strict disciplinary action.

Punishment:

Where the committee arrives at the conclusion that the allegation against the respondent has been proved, it shall recommend to the employer:

- (i) To take action for sexual harassment as a misconduct in accordance with the provisions of the Certified Standing Orders of the Company or the Service rules applicable to the respondent;
- (ii) To deduct, notwithstanding anything in the service rules applicable to the respondent, from the salary or wages of the respondent such sum it may consider appropriate to be paid to the aggrieved woman or to her legal heirs.

The above policy shall come to force w.e.f. February 1, 2014. Any changes to this policy shall require the sanction of Manager, HR & Administration.

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ANNEXURE 1

This Document shall be read as Annexure 1, in line with the Policy

Workplace: Definition

“Workplace” as defined under The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 includes—

- a. any department, organisation, undertaking, establishment, enterprise, institution, office, branch or unit which is established, owned, controlled or wholly or substantially financed by funds provided directly or indirectly by the appropriate Government or the local authority or a Government company or a corporation or a co-operative society;
- b. any private sector organisation or a private venture, undertaking, enterprise, institution, establishment, society, trust, non-governmental organisation, unit or service provider carrying on commercial, professional, vocational, educational, entertainment, industrial, health services or financial activities including production, supply, sale, distribution or service;
- c. hospitals or nursing homes;
- d. any sports institute, stadium, sports complex or competition or games venue, whether residential or not used for training, sports or other activities relating thereto;
- e. any place visited by the employee arising out of or during the course of employment including transportation by the employer for undertaking such journey; and
- f. a dwelling place or a house.

In addition to inappropriate visual, verbal and/or physical sexual harassment, sexual harassment may involve unwanted virtual interactions which will be termed as unwelcome

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virtual sexual harassment. Use of technology to induce different remote sensations on the body including, but not limited to pain and sexual stimulation, Sexual assault or using criminal force to any woman, intending to outrage or knowing it to be likely that he will thereby outrage her modesty.

Virtual harassment may include:

1. Not maintaining an appropriate dress code during a work call or video call.
2. Personal/ inappropriate comments on a person on a video or audio call;
3. Inappropriate emojis, memes, images or videos and messages; stalking, both physical and virtual;
4. Displaying posters, backgrounds with obscene or derogatory remarks;
5. Insisting on video calls;
6. Inappropriate or sexist jokes, sexualized bullying.

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Prevention of Sexual Harassment at workplace (POSH) - Internal Committee

In order to ensure protection against sexual harassment of women at workplace and for the prevention and redressal of complaints of sexual harassment and for matters connected therewith the Government of India has enacted Sexual Harassment of women at Workplace (Prevention, Prohibition & Redressal) Act, 2013.

INTERNAL COMMITTEE:

In pursuant to the provisions of the Act, Company has constituted an Internal Committee (IC). Any complaint of sexual harassment shall be reported to the Internal Committee. The details of the Committee are as below.

Presiding Officer	Members	External Member
Nagarathna C K	Joydeep Halder	Archana Madan Kohli (External Member)
	Glyn Crasto	
	Surekha Ajgaonkar	
	Rangawa Murnal	
	Panth Boorela	
	Sarita Shokeen	
	Akshay Nagpal	
	Ashok Srinivasan	
	Arcana Diniz	
	Sonali Redkar	
	Devendra Singh	
	Geetha Narasimhappa	
	Harish Pandurangan	
	Aditi Kotnis	
	Juwairiya Bai	
	Gomathi Shankar Ramakrishnan	
	Prasanna Nagaraja	
	Archana Parab	
	Karen Naik	
	Kompella Purnima	
	Saranya Palanisamy	
	Dakshayani B C	

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