



Prevention of Sexual Harassment (PoSH) Policy

Fyle Technologies Private Limited

#550, 11th cross, 2nd main, MICO Layout, BTM 2nd stage, Bengaluru, Karnataka - 560076.

1. Objective:

The core principle of Fyle Technologies Private Limited (**'Fyle'**) is to ensure gender equality and justice through all our interventions and practices. In keeping with this principle, it is important to ensure an organizational climate, free from discrimination and harassment with particular focus on sexual harassment. Sexual harassment of any of our Employees occurring in the workplace or in other settings in which Employees may find themselves in connection with their employment is unlawful and will not be accepted.

To achieve this goal, the conduct that is described as "Sexual Harassment" in this prevention of sexual harassment (PoSH) policy will not be tolerated. We have provided a procedure by which inappropriate conduct will be dealt with, if encountered by the Employees.

The Company views allegations of sexual harassment seriously and will respond promptly to complaints of sexual harassment. If it is determined that such inappropriate conduct has occurred, prompt and appropriate action as is necessary, including disciplinary action, will be initiated.

2. Scope

- a) This PoSH policy shall be applicable to all locations of the Company.
- b) This PoSH policy shall extend to all Employees (any gender) irrespective of their designation in all units of the Company.

3. Definitions

- a) 'Law' - shall mean The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and Prevention of Sexual Harassment, Rules or any other law in force for the time being.

- b) 'Act' - shall mean The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013.
- c) 'Employee' - shall mean any person employed by the Company including full-time, part-time, temporary, contract / casual, trainees, consultants and Employees of project partners etc.
- d) 'Aggrieved Person' - means the person who alleges to have been subjected to any act of sexual harassment by the Respondent.
- e) 'Complainant' - means the person who files a complaint of workplace sexual harassment.
- f) 'Respondent' - means a person against whom the Aggrieved Person/ Complainant has filed a complaint of workplace sexual harassment.
- g) 'Employer' – means any person who is responsible for the management, supervision and control of the workplace.

It is important to note that, 'Management' includes the person or board or committee responsible for formulation and administration of policies of such organization;

It could also be the person discharging contractual obligations with respect to his/her employees.

- h) 'Company' – includes Fyle Technologies Private Limited and any of its Indian subsidiaries/ affiliates.
- i) 'Workplace' – means Fyle Technologies Private Limited, any of its Indian subsidiaries/ affiliates, and any place visited by the Employee arising out of or during the course of employment including transportation provided by the employer for undertaking such journey.
- j) 'Sexual Harassment' - includes any one or more of the following unwelcome behaviour (whether directly or by implication) namely:
 - Physical contact & advances; or
 - A demand or request for sexual favours; or
 - Making sexually coloured remarks; or

- Showing pornography; or
- Any other unwelcome physical, verbal or non-verbal conduct of sexual nature.

No Employee shall be subjected to sexual harassment at the Workplace. The following circumstances, among other circumstances, if it occurs or is present in relation to or connected with any act or behaviour which is unwelcome and sexual in nature may amount to sexual harassment:

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

Sexual harassment in the workplace is generally of two distinct types.

(i) Quid Pro Quo (Conditional) sexual harassment

“Quid pro quo” sexual harassment means seeking sexual favors or advances in exchange for preferential treatment. This kind of sexual harassment occurs when consent to sexually explicit behaviour or speech is made a condition for employment or preferential treatment in employment. This kind of sexual harassment also occurs when refusal to comply with a “request of sexual favor” is met with retaliatory action/threat such as dismissal, demotion, difficult working conditions, defamation, bodily injury etc.

(ii) Hostile working environment sexual harassment

Hostile working environment sexual harassment occurs where Employees in a workplace are subject to a pattern of exposure to unwanted and unwelcome sexual behaviour from the Management or co-workers. This kind of behaviour makes the work environment of an Aggrieved Employee hostile. This is for the reason that such conduct creates an intimidating, offensive, oppressive, abusive

or humiliating work environment and which is severe and pervasive enough to interfere with his/her ability to work and perform.

Explanation of the word 'Unwelcome'

Unwelcome is the key in defining what conduct constitutes sexual harassment. The conduct in question must have been unwelcome. In other words, the complaining/aggrieved Employee must have found the behaviour in question as offensive, repulsive, repugnant, humiliating, embarrassing etc. It is the impact and effect the behaviour or conduct has on the recipient, and whether such behaviour is 'sexual' in nature, that will define the behaviour as sexual harassment.

Refer to Annexure 1 for more details on Examples of Sexual Harassment at Workplace.

4. Duties of an Employer

The employer shall-

- a) Provide a safe working environment at the workplace which shall include safety from the persons coming into contact at the workplace.
- b) Display at any conspicuous place in the workplace, the penal consequences of sexual harassments: and the order constituting, the Internal Committee.
- c) Organise workshops and awareness programmes at regular intervals for sensitising the employees with the provisions of the Act and orientation programmes for the members of the Internal Committee.
- d) Provide necessary facilities to the Internal Committee for dealing with the complaint and conducting an inquiry.
- e) Assist in securing the attendance of respondent and witnesses before the Internal Committee.
- f) Make available such information to the Internal Committee as it may require having regard to the complaint so made.

- g) Provide assistance to the Aggrieved Person if he / she so chooses to file a complaint in relation to the offence under the Indian Penal Code or any other law for the time being in force.
- h) Cause to initiate action, under the Indian Penal Code or any other law for the time being in force, against the perpetrator, or if the aggrieved employee so desires, where the perpetrator is not an employee, in the workplace at which the incident of sexual harassment took place
- i) Treat sexual harassment as a misconduct under the service rules/PoSH policy and initiate action for such misconduct;
- j) Monitor the timely submission of reports by the Internal Committee.

5. Duties of Employee

- All Employees have a responsibility to ensure that their behavior is not contrary to Company PoSH Policy.
- Employees are encouraged to reinforce the maintenance of a work environment free from sexual harassment.

6. Internal Committee (IC)

The Company has constituted an Internal Committee (hereinafter referred to as “IC”) for all its administrative units and offices for redressal of sexual harassment complaints and for ensuring time bound treatment of such complaints.

The Internal Committee shall implement the PoSH policy effectively in order to provide justice, safe working conditions to the Employees working in the company. The Internal Committee will initiate prompt and time bound action on the complaints received and submit appropriate recommendations to the Employer.

6.1. Constitution of Internal Committee:

To prevent instances of sexual harassment and to receive and effectively deal with complaints pertaining to the same, the Company has constituted the "Internal Committee" (hereinafter referred to as "PoSH Committee") in accordance with the provisions of the Act.

6.2. Composition of Internal Committee

Internal Committee shall consist of the following members to be nominated by the employer, namely:

- a) A Presiding Officer who shall be a woman employed at a senior level at workplace from amongst the employees.

In case a senior level woman employee is not available, the Presiding Officer shall be nominated from other offices or administrative units of the workplace. Provided further that in case the other offices or administrative units of the workplace do not have a senior level woman employee, the Presiding Officer shall be nominated from any other workplace of the same employer or other department or organization.

- b) Not less than two other Members from amongst employees preferably committed to the cause of women or who have had experience in social work or have legal knowledge.
- c) One external member from amongst non-governmental organisations or associations committed to the cause of women or a person familiar with the issues relating to sexual harassment.

(Internal Committee shall consist of minimum 4 members and at least 50% of the total members shall be women)

- d) At least one half of the total members of PoSH Committee shall be women.

6.3. Quorum for the Meeting of the PoSH Committee while conducting inquiry

A minimum of 3 members of the PoSH committee including the Presiding Officer are to be present for conducting the inquiry

6.4. Tenure and other terms and conditions of the Internal Committee:

- a) The Presiding Officer and every Member of the Internal Committee shall hold office for such period, not exceeding three years, from the date of their nomination as may be specified by the employer.
- b) The Member appointed from amongst the non-governmental organisations or associations shall be paid such fees or allowances for holding the proceedings of the Internal Committee, by the employer, as may be agreed upon.
- c) Where the Presiding Officer or any Member of the Internal Committee
 - i. breaches confidentiality by publishing, communicating or making known to the public, press and media in any manner any information related to the contents of the complaint, the identity and addresses of the aggrieved woman, respondent and witnesses, any information relating to conciliation and inquiry proceedings, recommendations of the Internal Committee and the action taken by the employer
 - ii. has been convicted for an offence or an inquiry into an offence under any law for the time being in force is pending against him/ her; or
 - iii. She/ he has been found guilty in any disciplinary proceedings or a disciplinary proceeding is pending against her/ him; or
 - iv. has so abused his/ her position as to render his/ her continuance in office prejudicial to the public interest, such Presiding Officer or Member, as the case may be, shall be removed from the Internal Committee and the vacancy so created or any casual vacancy shall be filled by fresh nomination in accordance with the provisions of this section.

A member of the PoSH Committee may resign at any time by tendering his/ her resignation in writing to **Mr. Sivaramakrishnan Narayanan, Director** of the Company.

6.5. Key Functions of IC:

- a) Effectively address workplace sexual harassment complaints
- b) Ensure timely redressal of matters related to sexual harassment at the workplace.
- c) Maintain confidentiality and follow principles of natural justice

The names and contact details of the Internal Committee members shall be available on the notice board of each location of the Company.

7. Redressal Procedure

The employees at Fyle have access to an online cloud-based platform named POSHsecure which must be used to file a complaint of workplace sexual harassment.

However, when a woman visitor or someone who is not a Fyle employee wants to file a complaint of workplace sexual harassment against a Fyle employee then the Internal Committee shall assist such person to either file a complaint on POSHsecure or as per redressal procedure outlined in PoSH Act.

The overall redressal procedures and process flow is as given below:

Step 1: Filing of complaint by the Aggrieved Individual/Complainant

Step 2: Resolution through Conciliation Mechanism, or

Step 3: Resolution through Formal inquiry

Step 4: Interim Relief (in case of inquiry)

Step 5: Final Decision, Inquiry report and recommendations

Step 6: Actions by Employer

Step 7: Filing of an Appeal(by parties), if necessary

7.1.Filing of Complaint: If an Employee experiences or witnesses sexual harassment in the workplace, he/she can complain within a period of three (3) months from the date

of the incident, and in case of series of incident, within a period of three (3) months from the date of last incident, to:

- a) The Internal Committee members by logging into respective user account and raise a complaint on POSHsecure platform (Explained in Annexure 2)
- b) any member of PoSH Committee using the complaint form (As attached in Annexure 2) – especially for woman visitors who would want to raise a complaint of workplace sexual harassment, or
- c) Send an e-mail (as mentioned in the notice board/poster) directly to the PoSH Committee

Please note: For some offences if the Complainant desires and the PoSH Committee deems fit, the matter shall be reported to the jurisdictional police.

7.2. Resolution through Conciliation: The PoSH Committee may, before initiating an inquiry, and *at the request of the Complainant* take steps to settle the matter between the Complainant and the Respondent through conciliation. Where a settlement is arrived at, no further inquiry shall be conducted by PoSH Committee as the case may be. No monetary settlement shall be made in conciliation.

Important Note: Withdrawal of the complaint at any stage of the proceedings shall not preclude the PoSH Committee from proceeding with the investigation where there is obvious truth or merit to the allegations in the complaint or where there is documentary or direct evidence that can prove the guilt of the person complained of or in the event there is evidence to indicate that such complaint is false/malicious.

7.3. Resolution through formal Inquiry: In the absence of request for conciliation or failure of conciliation process, the PoSH Committee shall formally investigate into the issue and prepare a report at the end of the investigation. The PoSH Committee for the purpose of its investigation would be entitled to elicit all forms of evidence, including access to written communication, witnesses, previous records, and all the Employees and the organization would co-operate in this regard.

- i. On receipt of complaint the PoSH Committee shall within a period of 7(seven) days send one copy of the complaint to the Respondent.

- ii. Upon receiving a formal complaint, the PoSH Committee shall ask the Complainant to prepare a detailed statement of incidents if written complaint is sketchy. A statement of allegations will be drawn up by the PoSH Committee and sent to the Respondent.
- iii. The Respondent shall, within a period of 10 (ten) days from the date of receipt of complaint from the PoSH Committee, file his/her reply to the complaint along with his/her list of documents, names and addresses of witnesses.
- iv. The statements and other evidence obtained in the inquiry process will be considered confidential materials.
- v. The PoSH Committee will organize verbal hearings with the Complainant and Respondent.
- vi. Statement of Complainant will be recorded first in the presence of the Respondent. Either of the parties may cross question the each other if there is a need to do so in the presence of the PoSH Committee.
- vii. The PoSH Committee will take its decision after carefully reviewing the circumstances, evidence and relevant statements in all fairness.
- viii. If either of the parties (Complainant or Respondent) being provided fair opportunity to participate in the inquiry and defend himself/herself fails to participate in the inquiry, for consecutive times without valid reason, the PoSH Committee may conduct the inquiry ex-parte.
- ix. The PoSH Committee will ensure confidentiality during the inquiry process.
- x. In the course of investigating any complaint of sexual harassment the principles of natural justice are adhered to namely:
 - Both parties shall be given reasonable opportunity to be heard along with witnesses and to produce any other relevant documents;
 - Upon completion of the investigation, both parties will be informed of the results of that investigation.

- Documents which form part of the official record shall also be given to the Complainant and Respondent.

- xi. The PoSH Committee shall be empowered to do all things necessary to ensure a fair hearing of the complaint including all things necessary to ensure that none of the parties to the complaint including witnesses are neither victimized nor discriminated against while dealing with a complaint of sexual harassment.

- xii. For the purpose of making an inquiry, the PoSH Committee shall have the 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:
 - (a) summoning and enforcing the attendance of any person and examining him on oath;
 - (b) requiring the discovery and production of documents: and
 - (c) any other matter which may be prescribed.

- xiii. In the event, PoSH Committee determines that sexual harassment has occurred, it will make appropriate recommendations as to necessary action to be instituted to remove the offensive conduct and, where appropriate, to institute disciplinary action.

- xiv. Given that Employer views any finding of sexual harassment a serious violation of human rights, if it is determined that inappropriate conduct has been committed by an employee, appropriate action will follow under the circumstances. Such action may range from counselling to termination from employment and may include such other forms of disciplinary action the Employer, deems appropriate under the circumstances. The Presiding Officer of the PoSH Committee will be guided by the Act, Rules and this PoSH policy for disciplinary action within the Company.

- xv. If the Respondent is guilty of serious Sexual Harassment or has repeatedly (second time) committed acts of Sexual Harassment, then he must be dismissed. In appropriate cases he may also be required to pay monetary compensation.

xvi. The PoSH Committee shall try its best to conclude the inquiry within 45 working days and not later than 90 (ninety) working days from the date of receipt of the complaint. The Internal Committee shall put in writing the justifies reasons for delay, if any.

xvii. After hearing both individuals and any other concerned parties in the case and based on the investigation, the PoSH Committee will prepare a report of findings, in writing, outlining the case, the investigation and the recommendations, no later than 10 (ten) working days from the date of conclusion of the inquiry.

xviii. The employer shall act upon the recommendation within 10 working days and not exceeding sixty days of its receipt by him.

7.4. **Interim relief:** During the pendency of inquiry until the final report is prepared on the case, PoSH Committee may recommend the Employer to take certain interim measures to protect the Aggrieved Employee/Complainant and provide safe working environment such as:

1. Transfer the Complainant or the Respondent to any other workplace; or
2. Grant leave to the Complainant up to a period of three months or until conclusion of the inquiry, whichever is earlier. The leave granted shall be in addition to the leave that the Complainant would otherwise be entitled as per the service rules of the Company
3. Not allow the Respondent to report on the performance of the Complainant;
4. Grant such other relief to the complaint as may be required.

The aggrieved person shall make a written request to the PoSH Committee for granting of interim relief during pendency of inquiry. On the recommendation of the PoSH Committee, the Employer shall implement the recommendations made by the PoSH Committee and send the report of such implementation to the PoSH Committee.

7.5. **Final Decision:** Where the PoSH Committee arrives at a conclusion that the allegations against the Respondent have been proved, it shall recommend the following to the Employer (Refer Annexure 3):

i. To take action for sexual harassment as an act of misconduct in accordance with the rules/regulations of the Company governing 'conduct and discipline' as applicable to the Respondent; and/or ii. To deduct such amount from the salary or wages of the Respondent as may be considered appropriate to be paid to the Complainant as per this POSH policy.

False or Malicious Complaint:

Where the PoSH Committee arrives at a conclusion that the allegation against the respondent is malicious or the aggrieved employee or any other person making the complaint has made the complaint knowing it to be false or the aggrieved employee or any other person making the complaint has produced any forged or misleading document, it may recommend to Mr. Sivaramakrishnan Narayan to take disciplinary action against the employee or the person who has made the complaint.

Disciplinary action may include a 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.

7.6. Filing of an Appeal

Any person aggrieved from the recommendations made by the PoSH Committee or non-implementation of such recommendations may prefer an appeal to the appellate authority at the Company so constituted.

If an appellate authority is not available at the Company then the parties may prefer to appeal as per the provisions of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013.

The appeal shall be preferred within a period of ninety days of the recommendations.

8. Confidentiality

The identity and address of the Aggrieved Individual, Respondent, witnesses, statements and other evidence obtained in the course of conciliation and/ or inquiry process, recommendations of the PoSH Committee or the Local Committee, as the case may be, and action taken by the Employer shall remain confidential in accordance with the provisions of this PoSH Policy read with the provisions of the Act, and shall not be published, communicated or made known to public, press and/ or media in any manner.

Any person contravening the aforesaid confidentiality clause shall be subjected to disciplinary action.

9. Protection to an aggrieved employee

The Company is committed to ensuring that no Employee who brings forward a harassment concern is subjected to any form of reprisal. Any reprisal will be subjected to disciplinary action. The Company will ensure that the Aggrieved Employee or witnesses are not victimized or discriminated against while dealing with complaints of sexual harassment. However, anyone who abuses the procedure (for example, by maliciously putting an allegation knowing it to be untrue) will be subjected to disciplinary action.

10. Annual Report

In terms of the Act the PoSH Committee shall, in each calendar year, prepare an annual report and submit the same to the Employer & District Officer/ Appropriate Authority.

Such annual report shall have the following details:

- (a) number of complaints of sexual harassment received in the year;
- (b) number of complaints disposed off during the year;
- (c) number of cases pending for more than ninety days;
- (d) number of workshops or awareness program against sexual harassment carried out;
- (e) nature of action taken by the Employer or District Officer/ Appropriate Authority.

11. Policy Review

This policy shall be reviewed on an annual basis and any amendments thereto shall be approved by the Board of Directors of the Company

12. Policy Approval

PREPARED BY:

Name: Abhinav Goswami / Itzhak Vini Singh
DocuSigned by: D0D483D7C15E486... DocuSigned by: 0A5FD4B32BC04E9...

Designation: Chief of Staff People Operations Signature

and Date: 11/28/2019 11/28/2019

APPROVED BY:

Name: Sivaramakrishnan Narayan

Designation: Co-founder & CTO

Signature and Date: Sivaramakrishnan
DocuSigned by: 2288318F72F4427...
11/28/2019

ANNEXURE - 1

EXAMPLES OF SEXUAL HARASSMENT IN THE WORKPLACE

A. Visual Conduct:

- Leering
- Making sexual gestures
- Displaying sexually suggestive or explicit objects, pictures (still or moving), cartoons, graffiti or posters in any manner, including as part of e-mail transmissions, MMS, SMS, Whatsapp or any other medium like social media, instant messaging platform or Applications etc.

B. Verbal Conduct:

- Whistling and catcalls
- Foul or obscene language
- Making or using derogatory comments which are sexual in nature
- Explicit discussions about sexual activities/behaviours
- Comments about a person's physical attributes
- Spreading rumors about another person's sexual activities/conduct and/or partners
- Inappropriate questions, suggestions or remarks about a person's sex life
- Jokes which contain offensive, obscene or lewd content
- Sexual advances / Sexual propositions like threats, blackmailing around sexual favors
- Unwelcome sexual advances which may or may not be accompanied by promises or threats, explicit or implicit
- Sexual innuendo or double entendre
- Unwelcome social invitations with sexual overtones, commonly understood as flirting.
- Persistently asking someone out despite being turn down

C. Written Conduct:

- Suggestive, obscene or propositioning letters, notes, greeting cards or invitations, including but not limited to those transmitted via e-mail
- Displaying pictures (still or moving), cartoons, graffiti or posters in writing, including but not limited to e-mail
- Persistently asking someone out despite being turn down via social media / instant messaging application/ e-mail etc.

D. Physical Conduct:

- Unwelcome touching
- Sexual Assault
- Kissing/Hugging / Fondling /Pinching / Groping

- Caressing someone against will (could be considered as assault)
- Coercing another person to participate in sexual intercourse or other sexual behaviours
- Impeding or blocking movements
- Invasion of personal space (getting too close for no reason, brushing against or cornering someone)
- Any physical interference with normal work or movement.
- Sexual gestures
- Stalking

E. Some examples of behaviour that constitute sexual harassment at workplace:

- Falsely accusing and undermining a person behind closed doors for sexual favors
- Controlling a person's reputation by rumor mongering about a person's private life

This is only an indicative list of the possible acts which could be treated as sexual harassment and is in no way intended to be construed as an exhaustive list.

ANNEXURE 2

Filing of a complaint by Employee of Fyle by using POSHsecure platform & Complaint Form

The Employees of Fyle must file a complaint of workplace sexual harassment by logging into their respective **POSHsecure accounts**.

- After signing in, click on the 'Raise Complaint' tab. Your name will automatically appear under the 'Complainant' tab.
- Respondent is a person against whom a complaint is filed.
- If you are not aware of the identity and details of the respondent, you may add whatever you know and some basic description of the person so that Internal Committee (IC) can identify the respondent.
- If you know that the respondent is from your organization and also registered on the portal, click on 'Enable search from the system' and start typing the person's name. Once it's done, click on the 'Add' button.
- Next, add the details about incident, like the place, date & time and brief overview of what had happened. Once you click on the 'Add' button, the details will appear in a table format. Here you can add witness and evidence if there are any.
- If there is more than one incident, you can keep adding the details in the same way.
- Once you have finished, please read the declaration to minimize risk of false complaint and click on 'Agree and File complaint' button to submit your complaint. From now on, you will be able to check the status of your complaint under the 'Complaint Inbox' tab.
- You will immediately receive a mail in your box confirming the successful submission of your complaint.
- Once you have submitted your complaint, it will be acknowledged by an Internal committee member within 24 hours
- Within 48 hours of acknowledgment, you will receive another email from IC mentioning the details of the first preliminary meeting.

However, for persons who are not registered as users on POSHsecure must fill up the form (below) and submit it to the Internal Committee.

Complaint Form

1. Name:
2. Department (If applicable):
3. Employee ID (If applicable):
4. Date of filing the complaint:
5. Date and time of Sexual Harassment incident:
6. Venue of the incident:
7. Details of the Respondent (name, department etc.):
8. Nature of the sexual harassment/describe in brief (in case of series of incidents, kindly mention all the incidents along with its details):
9. Details of any supporting evidence (if applicable):
10. Details of the witnesses (if applicable):
11. Do you wish to opt for conciliation?
12. Do you wish to seek any interim relief till the matter is resolved?

(Kindly attach any evidence relevant to the complaint along with this complaint form)

ANNEXURE - 3

Nature of action the PoSH Committee may recommend after concluding a conciliation or inquiry:

- Some of the actions which could be taken as a result of conciliation are:
 - written apology - warning
 - reprimand or censure
 - withholding of promotion
 - counselling session
 - carrying out community service etc.

No monetary settlement shall be made as a basis of conciliation

- Some of the actions which could be recommended as a result of inquiry are:
 - Disciplinary action, including a written apology, reprimand, warning, censure
 - Withholding promotion/ pay raise/ increment
 - Termination
 - Removal from service
 - Dismissal from service
 - Replacement
 - Adverse performance evaluation
 - Counselling
 - Community service
- The PoSH Committee may also recommend financial damages to the Aggrieved Person or his/her legal heir, which must be:
 - deducted from the salary/wages of the Respondent;
 - If the employer is unable to deduct such amount due to his absence, termination of employment, it may direct the Respondent to pay such amount to the Aggrieved Person directly;
 - If the Respondent fails to do so, it can be recovered as an arrear of land revenue and PoSH Committee shall forward the order of recovery to the concerned District Officer (District Magistrate/Addl. District Magistrate/Collector/Deputy Collector).

PoSH Committee must take into consideration while determining the amount of compensation:

- Mental trauma, pain, suffering and emotional distress caused;
- Medical expenses incurred;
- Loss of career opportunity;
- Income and financial status of the Respondent.

- Feasibility of such payment in lump sum or in instalments

The nature of the sanctions will depend on the gravity and extent of the harassment. Suitable deterrent sanctions will be applied to ensure that incidents of sexual harassment are not treated as trivial. Certain serious cases, including physical violence, will result in the immediate dismissal of the respondent.