



Policy on Prevention of Sexual Harassment at the Workplace

Section	Human Resources Policies
Subsection	General Policies
Subject	Prevention of Sexual Harassment at the Workplace
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1. Purpose:

The purpose of this policy is to reinforce Cimpress India's commitment to creating and maintaining a safe, respectful, and dignified work environment for all individuals engaged with the Company.

This policy takes complete cognizance of the legislation by the Government of India **“The Sexual Harassment at Workplace (Prevention, Prohibition and Redressal) Act 2013** (“the

Act”). This Act is to provide protection against sexual harassment of women at workplace and for the prevention and redressal of complaints of sexual harassment and for the matters connected herewith or incidental thereto. Any form of sexual harassment outside the purview of the statutory law will be handled through a different, but equally rigorous, internal mechanism under the **People Practices and Support framework** that follows the same principles of natural justice and confidentiality as the Internal Committee (IC).

2. Scope:

In alignment with the provisions of the POSH Act, this policy applies to all individuals as covered under the law who are associated with Cimpres India, regardless of their employment type, contractual status, or position within the organizational hierarchy. This includes permanent and temporary employees, interns, trainees, contractual staff etc.

The scope of this policy further extends to any individual who is not an employee but is present at the workplace in connection with business activities including clients, customers, visitors, vendors, suppliers, service providers, third-party associates etc.

3. Abbreviations:

- **POSH:** Prevention of Sexual Harassment
- **Act:** The Sexual Harassment of Women At Workplace (Prevention, prohibition and Redressal) Act, 2013.
- **IC:** Internal Committee
- **BNS:** Bharatiya Nyaya Sanhita 2023
- **RFO:** Remote first Optimization.

4. Definitions:

- a. **Sexual Harassment:** *“In accordance with Section 2(n) of the Act, “Sexual Harassment” includes any one or more of the following unwelcome acts or behavior (whether directly or by implication) namely:— (i) physical contact and advances; or (ii) a demand or request for sexual favours; or (iii) making sexually coloured remarks; or (iv) showing pornography; or (v) any other unwelcome physical, verbal or non-verbal conduct of sexual nature.”*

Explanation: "Sexual Harassment" is defined in accordance with Section 2(n) of the Act and includes both direct acts and circumstances that may lead to harassment.

1) Unwelcome Acts or Behavior Sexual harassment includes any one or more of the following unwelcome acts or behavior (whether directly or by implication):

- **Physical contact and advances:** This includes any unwanted touching, physical contact, or attempts at physical intimacy.
- **A demand or request for sexual favors:** This refers to any explicit or implicit demand for sexual favors in exchange for employment benefits, promotions, or any other professional advantage.

- **Making sexually colored remarks:** This includes verbal comments, jokes, innuendos, or gestures of a sexual nature that are offensive or inappropriate.
- **Showing pornography:** This involves the display or distribution of sexually explicit material, including pictures, videos, or digital content.
- **Any other unwelcome physical, verbal or non-verbal conduct of a sexual nature:** This is a broad category that covers any other offensive behavior not explicitly listed, such as stalking, inappropriate gestures, or repeated unwelcome invitations.

2) Circumstances Constituting Sexual Harassment (Hostile Work Environment)

In addition to the acts listed above, certain circumstances, when present in relation to or connected with any act or behavior of sexual harassment, may also be considered sexual harassment. These circumstances create a hostile or intimidating work environment and include:

- **Implied or explicit promise of preferential treatment in employment:** Where a person in a position of authority offers benefits like a promotion, raise, or favorable appraisal in exchange for sexual favors. This is also known as "Quid Pro Quo" harassment.
- **Implied or explicit threat of detrimental treatment in employment:** Where a person threatens negative consequences, such as termination, demotion, or a poor performance review, if a sexual favor is not granted.
- **Implied or explicit threat about present or future employment status:** Any behavior that suggests an employee's job security or future career prospects are dependent on their submission to sexual advances.
- **Interference with work or creating an intimidating or offensive or hostile work environment:** This refers to repeated acts that make the workplace uncomfortable, intimidating, or hostile, interfering with a person's ability to perform their job effectively.
- **Humiliating treatment likely to affect health or safety:** Any act of humiliation or intimidation that can cause mental, emotional, or physical distress to the aggrieved person.

See Below Annexure 1: Illustrative Examples of Sexual Harassment at Workplace

- b. **Aggrieved Person:** Also termed as Complainant as per law.

As per the POSH Act, 2013, an **"aggrieved woman"** means: *"a woman of any age whether employed or not, who alleges to have been subjected to any act of sexual harassment by the respondent."*

c. Respondent:

As per the POSH Act, 2013, “**respondent**” means a person against whom the aggrieved woman has made a complaint under section 9.”

- d. **Employee:** An employee is a person employed at a 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.
- e. **Workplace:** A workplace is any location or medium where an employee performs official duties for Cimpres, including company offices and approved remote work locations (such as "WeWork") or any other collaboration spaces. This definition encompasses venues for official company gatherings like RFOs, offsite meetings, training, conferences, and travel, as well as any other formal or informal business gatherings, irrespective of whether they occur during or outside of office hours, or on or off company premises. The ambit of the workplace specifically includes all virtual interactions and work-related communications, including any communication facilitated by information and communication technologies. Furthermore, the workplace extends to company provided transport and company-provided accommodations, ensuring that all professional environments whether physical, digital, or logistical fall under this scope.
- f. **Internal Committee:** “means an Internal Complaints Committee constituted under section 4”.
- g. **Member:** “means a member of the Internal Committee”.
- h. **Presiding Officer:** “means the Presiding Officer of the Internal Complaints Committee nominated under sub-section (2) of section 4”.
- i. **Employer:** Employer means any person responsible for the management, supervision and control of the workplace, formulation and administration of policies for such organization.

5. Constitution of Internal Complaints (IC) Committee:

In compliance with Section 4 of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (the “POSH Act”), **Cimpres India** has established a centralized Internal Committee (IC). This committee will have jurisdiction over all company workplaces, branches, and offices throughout India, ensuring consistency in how sexual harassment complaints are handled, investigated, and resolved across all locations. The Internal Committee will serve as the designated body for addressing all sexual harassment complaints under this Policy and within the scope of the POSH Act, covering all Cimpres India offices, locations, and entities.

Composition of the Internal Committee

The Internal Committee shall consist of the following members, nominated by the employer:

- **Presiding Officer:** A senior-level woman employee of the organization, shall be appointed as presiding officer.
- **Two or more employee members:** Committed to the cause of women, or who have experience in social work, legal knowledge, or community involvement.
- **One external member:** From an NGO or association committed to the cause of women or a person familiar with the issues of sexual harassment, labor rights, or human rights.

Note: As mandated by law, at least 50% of the members of the Internal Committee shall be women.

Purpose of the Internal Committee (IC): It is the designated body responsible for:

- Receiving complaints related to sexual harassment at the workplace.
- Conducting inquiries in accordance with the principles of natural justice and the POSH Act.
- Recommending appropriate action based on the findings of such inquiries.
- Ensuring fair, timely, and confidential redressal of complaints.

6. Inquiry and Redressal Process:

a. Complaint of Sexual Harassment

i. Anyone can file a complaint of sexual harassment by sending an email in writing to the Internal Committee at CI.InternalCommittee@cimpres.com. The complaint should be made within three months from the date of the last incident. In exceptional cases, if the Complainant was unable to file the complaint within this time due to valid reasons, the IC may extend the time limit by up to three more months, with the reasons in writing.

For details on filing a complaint on behalf of an aggrieved person as per the provisions of the law, please refer to Annexure 3.

2. The Complainant shall submit copies of the complaint along with supporting documents and relevant details concerning the alleged incident(s), the name and details of the Respondent and names and addresses of the witnesses to any IC member.

3. The IC may, depending on the facts of the case, also accept oral complaints under this Policy which may be reproduced in writing by a member of the IC and confirmation of the Complainant shall be obtained thereon.

b. Conciliation

i. Prior to initiating an inquiry, the IC may, at the request of the Complainant, take steps to settle the matter between the Complainant and the Respondent through conciliation, provided that no monetary settlement is made on the basis of such conciliation. In case a settlement as stated aforesaid has been arrived at, the IC shall

record the settlement so arrived and forward the same to the defined Management to take action as specified in the recommendation of the IC.

ii. The IC will provide copies of the settlement as recorded to the Complainant and the Respondent. Upon conciliation being reached, the IC would not be required to conduct any further inquiry. However, if the Aggrieved Woman informs the IC that any term or condition of the settlement arrived at by conciliation has not been complied with by the Respondent, the IC shall proceed to make an inquiry into the complaint.

c. Inquiry

1. If no settlement is reached through conciliation as provided under this Policy, the IC shall proceed to conduct a formal inquiry into the complaint in accordance with the provisions of the POSH Act.
2. On receipt of the complaint, the IC shall send one of the copies received from the Complainant to the Respondent within a period of seven working days.
3. The Respondent shall file his reply to the complaint along with his list of documents, and names and addresses of witnesses, within a period not exceeding ten working days from the date of receipt of the documents.
4. The IC shall make an inquiry into the complaint in accordance with the principles of natural justice. The IC must notify in writing, the time, and dates of its meetings to the Complainant, Respondent and Management not less than three days in advance of any such meeting.
5. While conducting the inquiry, a minimum of three members of the IC including the Presiding Officer, External IC Member, and other IC members as the case may be, shall be present.
6. The IC shall have the powers to summon and enforce the attendance of any person and conduct an examination, request the discovery and production of documents and / or any other matter which may be prescribed and deemed necessary for the inquiry process.
7. The IC shall have the right to terminate the inquiry proceedings or to give an ex-parte decision on the complaint, if the Complainant or Respondent fails, without sufficient cause, to present themselves, 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 days in advance, to the party concerned.
8. The Complainant and the Respondent shall not be allowed to bring in any legal practitioner to represent them in their case at any stage of the proceedings before the IC. If deemed necessary by the IC based on specific requests placed by parties involved, if any support is needed to be provided, all reasonable assistance in line to the provisions of the law would be extended by the IC.
9. All colleagues and witnesses including the Complainant and the Respondent who are part of the IC proceedings shall keep all details thereof strictly confidential. Confidentiality would be mandatory to be maintained by Complainant, Respondent, IC members and witnesses part of the inquiry, any violation would result in strict disciplinary action as per Cimpres People Practices and support.

-The contents of the complaint, identity and addresses of the Complainant, Respondent and witnesses, any information relating to conciliation and inquiry proceedings, recommendations of the IC and the action taken by the Company are not to be published, communicated, or made known to the public, press and media by anyone privy to such information in any manner.

-All records of complaints, including contents of meetings, results of investigations and other relevant material will be kept confidential by Company / IC except where

disclosure is required under disciplinary or other remedial processes or under applicable laws.

10. During the course of inquiry, the Complainant and the Respondent shall be given an opportunity of being heard. Once the Inquiry report is submitted to the management, the IC committee shall provide an extract of their findings and recommendations of the panel to the complainant and respondent.
11. The inquiry shall be completed within a period of ninety days from the date of receipt of the formal complaint from the complainant against the respondent identified unless the time is extended by the IC depending upon the facts of the case.
12. The report of the IC shall be treated as an inquiry report on the basis of which the Respondent can be awarded appropriate punishment.

d. Actions during Pendency of Inquiry

i. During the pendency of an inquiry, on a written request made by the Complainant, the IC may recommend the following to the Company:

- Transfer the Aggrieved individual or the Respondent to any other workplace; or
- Grant leave to the Aggrieved individual upto a period of three months; or
- Grant such other relief to the Aggrieved individual as may be prescribed under applicable law; or
- Restrain the Respondent from reporting on the work performance of the Aggrieved Individual.
- As per provisions of the POSH Act, IC shall offer reasonable assistance and guidance, should they choose to initiate appropriate legal proceedings, such as filing a criminal complaint under the relevant provisions of the BNS. The IC will continue to guide, advise, and ensure that internal inquiry processes proceed while upholding the complainant's rights and confidentiality.

e. Inquiry Report and Actions

1. On the completion of an inquiry, the IC shall provide a written report of its findings to the Management, within a period of ten days from the date of completion of the inquiry and such report be made available to the concerned parties.
2. In the event that the IC arrives at the conclusion that the allegation against the Respondent has not been proved, it shall recommend to the Management Team that no action is required to be taken in the matter.
3. Where the IC arrives at the conclusion that the allegation against the Respondent has been proved, it shall recommend in writing to the Management Team, to act against the Respondent, which may include:
 - A written apology from the Respondent.
 - Issuance of warning.
 - Immediate transfer or suspension.
 - Termination from service.
 - Withholding of promotion and/or pay rise or increments.
 - Such other action as the IC may deem appropriate in the circumstances of the case.
4. The Management shall act upon the recommendation given by IC within 60 days of receipt of the recommendation.

f. Malicious Complaint

In case the IC arrives at a conclusion that the allegation against the Respondent is malicious, or the Complainant has made the complaint knowing it to be false or has produced any forged, fabricated, or misleading document, it may recommend to the to take suitable action against the Complainant who has made the complaint. Mere inability to substantiate a complaint or provide adequate proof need not attract action against the Complainant.

g. Appeal

Any person aggrieved by the findings or recommendations of the Internal Committee (IC), or by the action taken by the employer based on such recommendations, shall have the right to appeal. The appeal must be filed within 90 days from the date of the communication of the IC's decision. Appeals shall be made in accordance with the provisions of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013.. The employer shall provide all reasonable assistance required for the appeal process, as mandated under the law.

7. Roles and Responsibilities:

a. Employees:

Employees must read, understand, and comply with this policy, report any sexual harassment concerns through the prescribed mechanisms, and forward complaints to the Internal Committee (IC). They are expected to cooperate fully in any inquiry, provide honest and complete information, and maintain confidentiality. Employees must avoid inappropriate behaviour, especially when representing Cimpres, and must not attempt to resolve complaints independently. Participation in the inquiry process is mandatory unless the complaint is formally withdrawn. All actions should reflect respectful conduct and uphold Cimpres's ethical standards.

b. Manager:

If an employee or stakeholder reports an incident of sexual harassment, it is the manager's responsibility to encourage the individual to file a written complaint with the IC and guide them as per the provisions of this policy. Managers must fully support the inquiry process, cooperate with the IC and HR, ensure team participation when required, and maintain strict confidentiality. They should not attempt to investigate the matter independently but must help implement decisions or corrective actions recommended by the IC or management. Additionally, managers must promote awareness of the POSH Policy, prevent retaliation, ensure a respectful work environment, and lead by example through ethical and professional conduct.

c. Internal Committee (IC):

- Be fair and objective while assessing cases, conducting investigations, and giving decisions.
- Conduct inquiries and recommend actions as per this policy and applicable legal requirements.
- Inform all parties involved in the inquiry in writing and within a reasonable time.
- Ensure dignity, respect, and impartial treatment for the Complainant, Respondent, witnesses, and others involved.
- IC is entrusted with the responsibility to maintain confidentiality, documenting all proceedings, and providing a final report.
- Submit an annual report to the Management with details of all cases handled and actions taken.
- Maintain strict confidentiality, handling information discreetly and sharing it only on a need-to-know basis.
- Assist employees and provide guidance to proceed with filing police complaints if offence falls under the Bharatiya Nyaya Sanhita (BNS) erstwhile Indian Penal Code.
- Providing inputs on training intervention to drive awareness within the company.
- Lead by example by demonstrating respectful workplace conduct and ethical behaviour.

Protection to Aggrieved Woman (Complainant)

- Company is committed to ensure that no Aggrieved Woman who brings forward a Sexual Harassment concern is subject to any form of reprisal.
- Company will ensure that the Aggrieved Woman or witnesses are not victimized or discriminated against while dealing with complaints of Sexual Harassment. Anyone who abuses the procedure will be subject to disciplinary action.

See annexures on the following pages.

Annexure 1: Illustrative Examples of Sexual Harassment at Workplace

Below Listing is not exhaustive and the internal committee at its discretion can include/ exclude any inappropriate behavior /situation.

Category	Specific Provisions of the Act	Illustrative Scenario
Physical contact & advances	Unwanted touching, patting, brushing against the body; forcing physical proximity.	Any unwelcome physical contact of a sexual nature.
Demand or request for sexual favors	Offering promotions, benefits, or favorable assignments in exchange for sexual favors; threats for refusal.	Using a position of power or authority to solicit sexual favors.
Sexually colored remarks	Offensive jokes, innuendos, or comments about a person's appearance or clothing.	Any unwelcome verbal comments or communication of a sexual nature.
Showing pornography / sexually explicit material	Displaying or sharing inappropriate images, videos, or links.	The use of sexually explicit or suggestive visual aids.
Unwelcome verbal / non-verbal conduct of sexual nature	Lewd gestures, whistling, suggestive notes or messages; intrusive personal comments.	Any other unwelcome conduct that is sexual in nature, including gestures, staring, or sexually suggestive communication.
Creating a hostile environment	Mocking, isolating, or humiliating an individual based on gender or appearance.	Actions that lead to an intimidating, offensive, or hostile work environment.

Annexure 2: Internal Committee Member Listing

To view the Internal Committee (IC) member details, refer to the following Confluence links as applicable:

- Business & Enabling Teams: [Click here](#).
- GSO: [Click here](#).

Annexure 3: Filing a Complaint on Behalf of the Aggrieved Person

In line with Section 9(2) of the POSH Act;

- If the Aggrieved Individual is unable to make a complaint on account of his/her physical incapacity, a complaint may be filed by:
 - His/her relative or friend; or
 - His/her co-worker; or
 - An officer of the National Commission for Women or State Women's Commission; or
 - Any person who has knowledge of the incident, with the written consent of the Aggrieved Individual.

- b. If the Aggrieved Individual is unable to make a complaint on account of his/her mental incapacity, a complaint may be filed by:
- His/her relative or friend; or
 - A qualified psychiatrist or psychologist; or
 - The guardian or authority under whose care he/she is receiving treatment or care; or
 - Any person who has knowledge of the incident jointly with the Aggrieved Individual's relative or friend or qualified psychiatrist or psychologist, or guardian or authority under whose care he/she is receiving treatment or care.
- c. If the Aggrieved individual for any other reason is unable to make a complaint, a complaint may be filed by any person who has knowledge of the incident, with his/her written consent.
- d. If the Aggrieved individual is deceased, a complaint may be filed by any person who has knowledge of the incident, with the written consent of his/her legal heir.

9. Important Links for Reference:

- Code of Conduct & Ethics: [Code of Business Conduct](#),
- Policies & Resources: [GSO Policy Link](#), [Non GSO Policy Link](#).
- People Practices and Support Framework Policy: [Click Here](#)
- Employee Assistance Program (EAP): [EAP Assistance - Click Here](#)
- Equal Employment Opportunity Policy: [Click Here](#)

10. Disclaimer and Right to Amend

This policy has been framed in accordance with the provisions of "The Sexual Harassment at Workplace (Prevention, Prohibition and Redressal) Act 2013 ("the Act") and the Rules framed thereunder. Accordingly, while the policy covers all the key aspects of the Act, for any further clarifications and/or in case of conflict between policy and the Act, references shall always be made to the Act and the provisions of the Act shall prevail over the policy.

11. Version History

Version No.	Approved By	Release Date	Key Changes
1.1	CI Management	31 December 2025	New additions to the policy: -Right to Appeal. -The definition section under the POSH Act expanded. -Circumstances Constituting Sexual Harassment defined with suggested scenarios. -Reference of Central IC Committee for Cimpres India defined as per law to cover for all offices explicitly. -Roles and responsibilities for Employees, Managers and IC have been defined. Other changes: - New IC members listing - Important Policy Links.
1.2	CI Management	20 March 2026	Change in IC Member Listing.
1.3	CI Management	09 July 2026	Added Confluence links for maintenance of IC Member Listing in Annexure 2.