



# **Prevention of Sexual Harassment of Women at Workplace**

## *Including Virtual Workplace Conduct Standards*

In accordance with the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and applicable rules, and supplemented by the Bharatiya Nyaya Sanhita, 2023

Jurisdiction	Maharashtra, India
Applicability	All employees, contractors, interns, and third-party personnel — physical and virtual workplaces

## **1. Preamble and Policy Statement**

WingManX Analytics and Technologies Pvt. Ltd. ("the Company") is an equal employment opportunity employer committed to a healthy, respectful, and dignified work environment for every person associated with it. The Company endorses a zero-tolerance policy for sexual harassment in any form — whether it occurs in a physical office, at a client site, or through any digital or virtual medium.

This Policy has been revised to explicitly extend its scope and redressal procedures to virtual and remote work environments, which now constitute an alternative and or a primary mode of work for the Company.

## **2. Scope and Applicability**

### **2.1 Who Is Covered**

This Policy applies to:

- All permanent employees, probationers, trainees, and interns of the Company
- Contractual staff, consultants, and freelancers engaged by the Company
- Vendors, visitors, or other third parties participating in Company activities

### **2.2 What Constitutes the Workplace**

Under this Policy, "workplace" means:

- The Company's registered office and any physical premises used for work
- Client sites and any offsite location visited in connection with employment
- Any virtual or digital medium used for work — including video conferencing platforms (Teams, Zoom, Google Meet), instant messaging (Slack, WhatsApp Business), email, social media in a professional context, and any other electronic channel.

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### 3. Definition of Sexual Harassment

Sexual harassment includes any unwelcome act or behaviour of a sexual nature, directly or by implication, including but not limited to:

- (a) Unwelcome sexual advances, requests or demands for sexual favours — explicitly or implicitly — in return for employment, promotion, evaluation or any company activity
- (b) Verbal, non-verbal, or physical conduct of a sexual nature: sexually coloured remarks, jokes, letters, phone calls, email, gestures, display of pornography, lurid stares, physical contact or molestation, stalking, display of offensive pictures or signs
- (c) Eve-teasing, innuendos, taunts, physical confinement against one's will, or any conduct likely to intrude upon a person's privacy
- (d) Conduct by a person in authority that creates a hostile or intimidating environment for a person belonging to the other sex
- (e) Any such conduct occurring at the workplace or outside it, in relation to an employee, during the course of employment
- (f) Any unwelcome gesture by an employee with sexual overtones
- (g) Conduct through electronic or virtual means — including explicit or suggestive messages, images, GIFs, recordings, or profile content sent through any digital platform — constitutes sexual harassment on equal terms with physical conduct.

*Sexual harassment also includes circumstances where preferential or adverse treatment in employment is implied or threatened, or where the work environment is made hostile, offensive, or intimidating regardless of explicit demands.*

### 4. Virtual Workplace Conduct Standards

#### 4.1 Prohibited Virtual Conduct

The following are expressly prohibited regardless of the platform used:

##### **On video calls and virtual meetings:**

- Appearing on camera in a state of undress or in an inappropriate setting
- Making sexually suggestive gestures, expressions, or movements visible on camera
- Directing sexually coloured comments, jokes, or remarks toward any participant
- Recording calls or meetings without the explicit consent of all participants
- Taking or sharing screenshots of participants in embarrassing or compromising situations

##### **In messaging, email, and chat:**

- Sending sexually explicit, suggestive, or offensive text, images, videos, GIFs, or memes
- Persistent messaging after the recipient has indicated discomfort or asked it to stop

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- Sending unwanted personal compliments focused on physical appearance
- Using work communication channels to monitor or track a colleague's personal activity

**On social media and professional platforms:**

- Tagging or posting about colleagues in a personal or sexualised manner without consent
- Making derogatory or sexual comments on a colleague's professional posts
- Publicly sharing private work-related conversations in a way that humiliates or targets an individual

**During screen sharing and in digital content:**

- Deliberately or carelessly sharing sexually explicit files, browsing history, or desktop content during screen shares
- Using virtual backgrounds, profile pictures, or display names that are sexually suggestive or offensive

**4.2 Expected Standards in Virtual Settings**

- Maintain the same professional conduct in virtual meetings as in a physical office — dress appropriately when on camera, ensure the visible environment is professional
- Obtain consent before recording any meeting or call
- Respect boundaries if a colleague disengages from informal digital communication outside working hours
- Do not share screenshots, screen recordings, or personal data of colleagues without authorisation
- Report virtual misconduct you witness or experience to the IC promptly

**4.3 Digital Evidence Preservation**

Employees who experience or witness virtual misconduct are strongly encouraged to preserve the following before filing a complaint:

- Screenshots or screen recordings of offensive messages, call behaviour, or chat logs
- Emails with full headers intact
- Platform-generated activity logs (available from IT on request)
- Names of witnesses who were present on the call or in the group

*Do not delete or alter potential evidence after an incident. The IT team will assist the IC in recovering evidence from company-managed devices and platforms upon IC requisition.*

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## 5. Internal Committee (IC)

A Committee has been constituted by the Management under Section 4 of the POSH Act to receive, investigate, and redress complaints of sexual harassment. The IC has jurisdiction over both physical and virtual workplace incidents.

### 5.1 Composition

No.	Name	Role
1	Aanjali Pashankar	Presiding Officer / Head HR
2	Sanjeev Jain	Member
3	Pranali Yewankar	Member
4	Nikita Waghmare	Member
5	Archita Banerjee	Member
6	Garima Goyal	External Member

### 5.2 Quorum

A minimum quorum of 3 members — including the Presiding Officer and at least one woman member — is required for proceedings to be valid. The IC shall include not less than one-half women members overall.

### 5.3 Tenure

Each member's term is 3 years from the date of appointment. The employer shall re-constitute the IC before any term expires.

### 5.4 Virtual Proceedings

The IC may conduct hearings, depositions, and inquiries through video conferencing where parties are in different locations, provided all procedural safeguards — opportunity to be heard, confidentiality, documentation — are maintained. Proceedings conducted virtually carry the same legal weight as physical hearings.

## 6. Complaint Mechanism

### 6.1 Who May Complain

Any aggrieved woman employed at the Company — in any capacity — may file a complaint with the IC. Where the aggrieved woman is unable to file a complaint due to physical incapacity or mental trauma, a complaint may be filed on her behalf by a relative, friend, co-worker, or any other person with her knowledge and consent.

### 6.2 Time Limit

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A complaint must be filed within 3 months of the incident, or within 3 months of the last incident in a series of incidents. The IC may extend this period by a further 3 months where sufficient cause is shown in writing.

### 6.3 How to File

- Written complaint submitted to any IC member or directly to the Presiding Officer
  - Email to: [hr@WingManXglobal.com](mailto:hr@WingManXglobal.com) / [apashankar@WingManXglobal.com](mailto:apashankar@WingManXglobal.com)
- For virtual workplace incidents, the complaint should where possible include screenshots, message logs, platform-generated records, or other digital evidence preserved per Section 4.3.

### 7. Redressal Process

On receipt of a complaint:

- (a) The IC shall maintain a confidential register of complaints received and shall not disclose the contents except for the purpose of investigation.
- (b) The IC shall meet with the complainant within 5 days of receipt of the complaint (no later than 7 days in any case) to hear and record her allegations. The complainant may submit corroborative material — documentary, oral, or written — at this stage.
- (c) Where the complainant does not wish to depose personally, a woman officer shall meet and record the statement of a woman complainant; a male officer shall do so for a male complainant.
- (d) Prior to formal inquiry, the IC may at the complainant's request attempt conciliation. No monetary settlement shall form the basis of conciliation.
- (e) The respondent shall then be called before the IC and given a full opportunity to present their explanation.
- (f) If the complaint does not disclose an offence of sexual harassment, the IC shall record reasons and close the matter.
- (g) If the complaint is found to be false and made with malicious intent and supporting false evidence, the IC may recommend appropriate disciplinary action. Inability to substantiate a complaint shall not by itself constitute malicious intent.

### 8. Inquiry Process

- (a) The IC shall proceed to formal inquiry immediately upon determining the complaint warrants one, and shall communicate this to both parties.
- (b) A Statement of Allegations shall be prepared and served on the respondent, who shall have 7 days from receipt to submit a written explanation.
- (c) The complainant shall receive a copy of the respondent's written explanation.
- (d) Either party may request that specific witnesses be called; such requests must be made in writing to the IC.

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- (e) Documentary evidence tendered by either party must be submitted as originals (or certified copies), signed by the tendering party.
- (f) The IC shall call all witnesses nominated by both parties and give each party a full and equal opportunity to present and defend their case.
- (g) The inquiry shall be completed within 60 days of receipt of the complaint. The IC shall submit its report and recommendations to the employer within 10 days of completing the inquiry. The employer shall act on the recommendations within 60 days of receipt of the report.

Where an incident arises from virtual conduct, the IC shall: preserve all digital evidence in original form with metadata intact; record chain of custody for screenshots, logs, or recordings; not rely on evidence obtained through unauthorised surveillance; and where authenticity is disputed, seek technical verification from IT or an external expert.

## 9. Interim Relief

Pending completion of inquiry, the IC may recommend:

- Transfer of the respondent to another team, project, or reporting line
- Temporary suspension of the respondent with pay
- Grant of leave to the complainant for up to 3 months (treated as paid leave, not deducted from entitlement)
- Restriction of the respondent's access to shared communication platforms, group channels, or virtual meeting invitations where the complainant is a participant

## 10. Disciplinary Action

If the inquiry substantiates the complaint, the IC may recommend one or more of:

- (a) Written warning with record in personnel file
- (b) Reprimand or censure
- (c) Withholding of increment or promotion
- (d) Suspension without pay
- (e) Termination of employment
- (f) Compensation payable to the complainant
- (g) Transfer or other corrective action as appropriate

Where the respondent is an employee of a vendor organisation, the Company shall refer the matter to that employer and may, where warranted, terminate the engagement or business relationship

## 11. Confidentiality

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The identity of the complainant, respondent, and witnesses, and the contents of proceedings, shall be kept strictly confidential by all IC members, HR personnel, and management involved in implementing recommendations. The complainant's identity shall never be disclosed in any public forum, company communication, or external report.

## 12. Employer Obligations

- Display this Policy and IC contact details on the Company intranet and at the registered office
- Organise POSH awareness and sensitisation programmes at least once a year
- Include POSH training in the onboarding curriculum for all new joiners
- File an annual report with the District Officer on cases received and disposed of by the IC
- Ensure the IC is properly constituted with an external member and reconstituted on expiry of terms
- Provide the IC with necessary facilities including virtual meeting infrastructure for inquiry purposes
- Where third-party or outsider conduct is involved, take all reasonable steps to assist the affected person

## 13. Gender-Inclusive Conduct Commitment

The POSH Act is expressly gender-specific in its complainant definition: only women may file before the IC. However, WingManX exercises its independent employer authority to extend equivalent conduct standards and an Internal Grievance Mechanism (IGM) to all employees regardless of gender. The IGM applies the same definition of prohibited conduct, the same inquiry procedure, and the same disciplinary framework. It is HR-administered, not IC-administered.

Refer to Addendum A — Gender-Inclusive Conduct Standards for full details of the IGM process.

## 14. Grievance Escalation

If the IC fails to discharge its duties or the employer fails to act on IC recommendations:

- Local Complaints Committee (LCC) constituted by the District Officer under Section 6 of the POSH Act
- Labour Commissioner, Maharashtra
- Courts of competent jurisdiction
- National Commission for Women (NCW) helpline

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This Policy will be updated as required from time to time to reflect changes in law, judicial interpretation, regulatory guidance, and organisational needs. The most current version shall be available on the Company HR portal and with HR and shall supersede all prior versions from its effective date.



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## **Addendum A — Gender-Inclusive Conduct Standards**

### **1. Purpose of This Addendum**

The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 ("POSH Act") was enacted with a specific legislative mandate to protect women. Its scope, definitions, and redressal mechanism are expressly framed around an aggrieved woman as the complainant.

This Addendum does not alter, dilute, or override any provision of the POSH Act or the parent policy. Its sole purpose is to state, clearly and unambiguously, that WingManX as an employer chooses to extend equivalent conduct standards and internal redressal access to all employees — irrespective of gender — through its general Code of Conduct and HR grievance framework.

#### **What this Addendum is — and is not**

This is a conduct and grievance commitment by WingManX. It is not a legal amendment to the POSH Act. Complaints by women remain governed by the POSH Act and the IC constituted under it. Complaints by men or non-binary individuals are governed by this Addendum and the Company's general grievance policy, and are investigated by HR with the same procedural rigour.

### **2. WingManX's Inclusive Standard**

WingManX recognises that harassment, hostile conduct, and unwanted sexualised behaviour cause harm regardless of the gender of the person targeted. Accordingly, the Company adopts the following voluntary commitments:

#### **3.1 Equal Conduct Standard**

The prohibited behaviours listed in the parent policy — including virtual-specific prohibited conduct under Section 5 — apply with equal force regardless of whether the target is a woman, man, transgender person, or a person of any other gender identity. No employee may treat another in a manner that is sexually harassing, hostile, or demeaning on the basis of their gender or gender expression.

#### **3.2 Internal Grievance Access for All**

Any employee who experiences conduct that would constitute sexual harassment under the POSH Act — but who does not qualify as an "aggrieved woman" under the Act — may file a grievance with the HR team under the Company's Internal Grievance Mechanism ("IGM"). The IGM shall:

- Apply the same definition of sexual harassment (Section 2(n) POSH Act) as the benchmark for evaluating conduct

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- Follow the same inquiry procedure — timelines, confidentiality, opportunity to be heard — as the IC process
- Recommend the same range of disciplinary actions available under the POSH framework
- Be overseen by a senior HR officer and, where appropriate, an external expert to ensure impartiality

### 3.3 No Retaliation

No person — regardless of gender — shall face retaliation for making a good faith complaint, assisting in an investigation, or refusing unwelcome conduct. Retaliation is a separate misconduct and shall be treated as such independently of the outcome of the underlying complaint.

### 3.4 Intersectional Sensitivity

The Company acknowledges that harassment often intersects with other aspects of identity — caste, disability, sexual orientation, religion. While this policy focuses on gender-based and sexual conduct, the Company's broader anti-discrimination commitment covers these dimensions. Employees experiencing intersectional harm are encouraged to state all relevant aspects in their grievance.

## 4. What This Addendum Does Not Change

For absolute clarity, the following remain unchanged:

Under the POSH Act (unchanged)	Under this Addendum (additional)
Only women can file a complaint with the IC	All genders can file a grievance with HR/IGM
IC composition and procedure per Sections 4–11 POSH Act	IGM follows equivalent procedure but is HR-administered
Annual statutory report filed by employer with District Officer	Internal grievance data tracked separately in HR records

## 5. How to Raise a Grievance (All Genders)

If you are not an "aggrieved woman" under the POSH Act but have experienced conduct that you believe constitutes sexual harassment or hostile conduct, you may:

- **Email:** apashankar@rewiseglobal.com with subject line "Grievance — Confidential"
- **Approach:** The HR Head directly in person or via a confidential meeting request
- **Write to:** The Presiding Officer of the IC, who will route non-POSH grievances to the IGM

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Your identity and complaint details will be kept confidential by the HR team.

## 6. Acknowledgement of Limitation

WingManX is transparent with its employees: this Addendum is an internal policy commitment, not a statutory right. If you are not a woman as defined under the POSH Act, your complaint is not governed by the Act and cannot be taken to the Local Complaints Committee or enforced through the statutory mechanism.

However, the Company's disciplinary authority over its employees is independent of statute. WingManX can — and will — take action against any employee whose conduct is established to be harassing, regardless of the genders involved, under service rules and the terms of employment.



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