

POSH and Respectful Workplace Policy

Kovon Global Private Limited | Level 1 Board Policy

Policy owner	Head of People
Approving authority	Board of Directors
Effective date	1 April 2026
Version	1.0
Review frequency	Annual, or earlier if required by law, IC recommendation, serious incident, audit finding or Board direction
Primary jurisdiction	Bengaluru, India
Reporting channel	ethics@kovon.io with POSH routing
Applies to	Employees, interns, consultants, contractors, agency workers, candidates, visitors, vendors, clients and other persons in Kovon's workplace ecosystem
Related policies	Corporate Policy Governance Framework; Code of Conduct and Ethics Policy; Whistleblower and Non-Retaliation Policy

Kovon's commitment

Kovon is committed to a workplace free from sexual harassment, harassment, discrimination, intimidation and retaliation. The statutory rights of aggrieved women under Indian POSH law are preserved in full, and Kovon's internal conduct standard applies respectfully and neutrally to all genders.

1. Purpose

Kovon Global Private Limited ("Kovon" or the "Company") adopts this POSH and Respectful Workplace Policy to prevent, prohibit and redress sexual harassment at the workplace and to promote a safe, respectful and dignified working environment.

This policy is framed for Kovon's Bengaluru, India operations and is intended to align with the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and related rules, while also establishing a broader internal respectful workplace standard for all covered persons.

2. Scope and Coverage

This policy applies to conduct occurring in connection with Kovon's workplace, business, recruitment activity, systems, communications or work relationships. Workplace coverage includes:

1. Kovon offices and any physical workplace controlled or used by Kovon;
2. remote work, hybrid work and work-from-home arrangements;
3. work chat, email, calls, video meetings, collaboration tools and other digital communication;
4. client, vendor, partner, training, event, interview or meeting locations;
5. business travel, accommodation and company-sponsored or work-related events;
6. candidate interactions, interviews, assessments, onboarding, placement and support processes;
7. transportation arranged or sponsored by Kovon;
8. any place visited by a covered person arising out of or during the course of work.

3. Gender Scope

Statutory POSH rights under Indian law are preserved for aggrieved women. Kovon's Internal Committee process will handle complaints by aggrieved women in accordance with applicable POSH requirements.

In addition, Kovon applies a gender-neutral internal respectful workplace standard. Concerns raised by persons of any gender that do not fall within the statutory POSH process may still be reviewed under the Code of Conduct and Ethics Policy, Whistleblower and Non-Retaliation Policy, employment terms or other applicable process.

4. Definition of Sexual Harassment

Sexual harassment includes any unwelcome act, behaviour, communication, request or conduct of a sexual nature, whether direct or implied. It may occur physically, verbally, visually, digitally or through conduct.

Examples include:

9. unwelcome physical contact or advances;
10. demand or request for sexual favours;
11. sexually coloured remarks, jokes, messages, gestures, innuendo or comments;
12. showing, sending or displaying pornography, sexual images or sexually explicit material;
13. unwelcome comments about a person's body, appearance, clothing, relationships or private life;
14. repeated invitations, messages or attention after refusal or discomfort has been communicated;
15. quid pro quo conduct, where work benefit or detriment is linked to sexual conduct;

16. creating a hostile, intimidating, humiliating or offensive work environment.

5. Prohibited Conduct

Kovon prohibits sexual harassment, retaliation, victimisation, intimidation, interference with complaints, malicious evidence destruction, and pressure on any person to withdraw or alter a complaint.

Managers and senior personnel are prohibited from misusing authority, influence, hiring power, evaluation power, compensation decisions, work allocation, client access or career opportunities in a manner that creates sexual harassment risk or coercive pressure.

6. Internal Committee

Kovon has constituted an Internal Committee ("IC") to receive and redress POSH complaints. The IC must be constituted and maintained in accordance with applicable law, including composition, tenure, independence and external-member requirements.

Role	Name / designation	Notes
Presiding Officer	Kavyashree K	Senior woman employee; primary IC lead.
Employee member	Bibartan Roy	Employee member.
Employee member	To be appointed	Governance action: appoint at least one additional employee member so the IC has the required minimum composition.
External member	Deepali, Legal Counsel	External member with legal expertise.

IC composition action

The Company should formally appoint the missing employee member, confirm that at least half of the IC members are women, record appointment letters, tenure and training, and publish current IC details on the HRMS / employee portal and workplace notice areas.

7. Reporting and Complaint Channel

POSH complaints and related concerns may be submitted to ethics@kovon.io with POSH routing, the IC Presiding Officer, any IC member or the Head of People. Sexual harassment matters must be routed to the IC.

A statutory POSH complaint should be made in writing by the aggrieved woman. If the complainant is unable to make the complaint in writing, the IC Presiding Officer will provide reasonable assistance to reduce the complaint to writing.

The complaint should ideally include the names of persons involved, dates, locations, description of conduct, witnesses, records, messages, screenshots or other supporting material where available.

8. Complaint Timeline

A statutory POSH complaint should ordinarily be made within 3 months from the date of the incident or, in the case of a series of incidents, within 3 months from the date of the last incident. The IC may extend this by a further period where legally permitted if it is satisfied that circumstances prevented timely filing.

Kovon encourages early reporting so that support, interim measures and evidence preservation can be handled effectively.

9. Conciliation

Before initiating an inquiry, the IC may facilitate conciliation only if requested by the complainant and where legally permissible. Conciliation must be voluntary and must not be based on monetary settlement.

If a conciliation settlement is reached, the IC will record the settlement and provide copies to the complainant and respondent as required. If settlement terms are not complied with, the IC may proceed with an inquiry in accordance with law.

10. Interim Relief

During the pendency of a complaint or inquiry, the IC may recommend interim measures to protect safety, dignity, confidentiality, evidence integrity and non-retaliation. Interim measures are not a finding of guilt.

17. temporary reporting-line change;
18. temporary work location or seating change;
19. leave as legally permissible;
20. access restrictions or system-access adjustments;
21. no-contact or limited-contact instruction;
22. temporary reassignment of work, interviews, candidate handling or client interaction where appropriate.

11. Inquiry Process

The IC will conduct inquiries in a fair, confidential, timely and impartial manner. The process should provide both complainant and respondent an opportunity to present their case, submit relevant evidence and identify witnesses, subject to applicable law and confidentiality requirements.

Stage	Expected handling
Complaint receipt	Record complaint, acknowledge where contact details are available, assess immediate safety or retaliation risk.
Prima facie review	Confirm whether the complaint falls within POSH jurisdiction or should be routed to another Kovon process.
Notice and response	Provide the respondent with required notice and opportunity to respond in accordance with law and natural justice.
Evidence and interviews	Review documents, messages, systems, witnesses and relevant context.
Findings and report	Prepare a reasoned report with findings and recommendations within the applicable statutory timeline.
Action and closure	Employer to act on IC recommendations within applicable timelines and track closure.

12. Confidentiality

Confidentiality is mandatory. The identity of the complainant, respondent, witnesses, IC proceedings, recommendations and action taken must not be published, communicated or made known to unauthorised persons except as required for inquiry, legal compliance, implementation of recommendations or lawful proceedings.

Breach of confidentiality may result in disciplinary or contractual action.

13. Protection Against Retaliation

Kovon prohibits retaliation against any person who raises a POSH concern in good faith, supports a complainant, acts as a witness, assists the IC, refuses improper conduct or participates in an inquiry.

Retaliation may include threats, intimidation, exclusion, adverse work allocation, unfair performance treatment, denial of opportunities, pressure to withdraw a complaint, victimisation or contract action linked to the complaint.

14. False or Malicious Complaints

Kovon will not treat a complaint as false merely because it is not substantiated or because evidence is insufficient. Action for false or malicious complaint may be considered only where the IC

concludes, based on evidence, that the complaint was knowingly false, malicious or supported by forged or misleading evidence.

15. Corrective and Disciplinary Action

Where allegations are substantiated, Kovon may take corrective or disciplinary action based on IC recommendations, applicable law, severity, impact, role, prior conduct and contractual status.

- 23. written apology, warning, reprimand or counselling;
- 24. mandatory training or behavioural correction plan;
- 25. withholding promotion, increment, bonus or opportunity where legally permissible;
- 26. change of role, reporting line, access, work location or duties;
- 27. deduction from salary or compensation to the aggrieved woman where legally directed and permissible;
- 28. termination of employment or engagement;
- 29. vendor, candidate, client or third-party restrictions;
- 30. reporting to law enforcement where required or appropriate.

16. Manager and Bystander Responsibilities

Managers must model respectful conduct, respond promptly to concerns, avoid retaliation, preserve confidentiality and escalate sexual harassment concerns to the IC. Managers must not conduct informal settlements or discourage reporting.

Bystanders who witness concerning conduct are encouraged to support the affected person, preserve relevant evidence where appropriate and report concerns through approved channels.

17. Training, Awareness and Publication

Kovon will conduct annual workforce POSH awareness training, mandatory new-joiner POSH training and specialised IC training annually. Training completion should be tracked by the Head of People.

Kovon will publish the policy, reporting channel and IC member details through the HRMS / employee portal and appropriate workplace communication channels. Where legally required, notices should be displayed at conspicuous workplace locations.

18. Annual Reporting and Records

The Head of People, together with the IC Presiding Officer, owns POSH annual reporting, Board reporting and statutory reporting coordination. IC records must be retained securely with restricted access.

Annual reporting should include the number of complaints received, disposed of, pending beyond the statutory period, awareness programmes conducted, action taken and any other information required by law.

19. Relationship with Other Policies

This policy should be read with Kovon's Code of Conduct and Ethics Policy, Whistleblower and Non-Retaliation Policy, Corporate Policy Governance Framework and applicable employment or contractor terms.

Where a concern does not fall within statutory POSH jurisdiction, Kovon may review it under another applicable policy or process.

20. Review and Amendment

This policy will be reviewed annually by the Head of People with the IC Presiding Officer and submitted to the Board of Directors for approval of material changes. Earlier review may be triggered by legal change, IC recommendation, serious incident, audit finding or Board direction.

Appendix A: Complainant Support Checklist

31. Confirm immediate safety and whether interim relief is needed.
32. Explain available reporting channels and IC process.
33. Assist the complainant in reducing the complaint to writing if needed.
34. Preserve relevant messages, documents, screenshots, call records, access logs or witness details.
35. Explain confidentiality and non-retaliation protections.
36. Avoid pressuring the complainant into conciliation or informal resolution.
37. Route statutory POSH complaints to the IC promptly.

Appendix B: Acknowledgement

I acknowledge that I have received or been given access to Kovon's POSH and Respectful Workplace Policy. I understand that sexual harassment, retaliation and breach of confidentiality are prohibited, and that I am expected to comply with this policy and participate in required POSH training.

Name	
Role / engagement type	
Department / function	
Signature / electronic acknowledgement	
Date	