CIVIC STUDIOS ANTI-SEXUAL HARASSMENT POLICY

Civic Studios is committed to ensuring that it remains a safe and inclusive space for all its employees. In furtherance of the law set down by the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (hereinafter referred to as the 'Act'), and the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Rules, 2013 (hereinafter referred to as the 'Rules'), and our personal commitment towards ensuring a work environment free from sexual harassment of any nature, Civic Studios has brought into force this Anti-Sexual Harassment Policy (hereinafter referred to as the 'Policy').

This policy has been accepted by the Civic Studios Production Private Limited by way of a certified true copy of this resolution passed at the meeting of the Board of Directors of Civic Studios Productions Private Limited held on February 3, 2022, at 11:00 AM at its registered office address at A-801, Crescenzo, C/38-39, G-Block, Bandra-Kurla Complex, Mumbai- 400 051. This policy came into effect from March 1, 2022.

Please visit the FAQs page to familiarise yourself with the features & applications of the policy. For any other queries, please write to your IC at poshatcs@gmail.com.

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A. DEFINITIONS

For the purpose of this policy, certain terms are defined as follows. Terms not specifically defined in the Policy shall be construed according to their plain meaning.

1. **Employee**: any person engaged in work directly or indirectly for Civic Studios, irrespective of whether they are employed in a permanent, retainership, probationary, temporary, trainee, contractual, consulting or voluntary capacity, and irrespective of whether they are remunerated for their work or not. It also includes those engaged to work for Civic Studios via a contractor or service provider, with or without the knowledge of the employer.
2. **Employer**: the person(s) responsible for management, supervision, and control of Civic Studios i.e. the Board of Directors for Civic Studios.
3. **Internal Committee (IC)**: means an Internal Committee constituted under Part C of this Policy.
4. **Aggrieved woman:** in relation to a workplace, any woman, employee or not, who alleges that they have been subjected to sexual harassment by the respondent. The Act only recognises sexual harassment only as perpetrated by a person of any gender against a woman.[1]
5. **Respondent**: any person accused of perpetrating, abetting, aiding, and/or facilitating sexual harassment. The respondent can be of any gender.
6. **Workplace**: including but not limited to the physical working space of employees and members, extending to any physical or virtual space that the employees may occupy or engage in, in the course of their work, including the transit to and from that place if the mode of transport is provided for by Civic Studios.
7. **Sexual Harassment** includes any one or more of the following, implied or direct, unwelcome acts or behaviours, directed against a woman:
   7.1. Physical contact and advances;
   7.2. Asking for or demanding sex or other sexual acts;
   7.3. Making sexually coloured remarks;

[1] The Sexual Harassment of Women at Workplace Act 2013 only recognises cis-gendered women as aggrieved persons, but the POSH policy at Civic Studios accepts claims of sexual harassment by all members, irrespective of their gender. Please refer to Annexure II for more details.

7.4. Showing pornography;

7.5 Sending sexually offensives emails or messages

7.6. Any other unwelcome act or behaviour of a sexual nature, which could be physical, verbal or non verbal, or digitally mediated.

The following circumstances, among other circumstances, if it occurs or is present in relation to or connected with any act or behaviour of sexual harassment (given above), may amount to **sexual harassment**:

(a) There is a direct or indirect promise of preferential treatment in her employment;
(b) There is a direct or indirect threat of detrimental treatment in her employment;
(c) There is a direct or indirect threat about her present or future employment;
(d) There is an interference with her work or creating an intimidating, offensive or hostile work environment for her;
(e) Humiliating treatment that is likely to affect her health or safety.

B. APPLICABILITY

The Civic Studios Productions Private Limited is a private limited company formed and governed as per the provisions of the Companies Act, 2013 and incorporated under the provisions of the Companies Act, 2013, on 20th September, 2018 vide Corporate Identity Number U74999MH2018PTC314444 and having its registered office situated at A-801, Crescenzo, C/38-39, G Block, Bandra Kurla Complex, Mumbai – 400 051, Maharashtra, India. The Civic Studios Production Private Limited is into the business of making, producing (pre and/ or post), publishing, exhibiting, distributing, renting, or purchasing of entertainment and media content such as, but not limited, to feature film, documentaries, television content, digital content, advertisement films, theatre plays, sketches, stand-up comedy, poetry, literary content, musical or dance performances, concerts, exhibitions, or performances of any kind.

1. This policy is applicable to:

(a) All employees of Civic Studios (full time, contractual, or voluntary). Civic Studios also has the right to take appropriate action against employees under this policy if a complaint in respect of sexual harassment is filed by an outsider or third party who has faced sexual harassment by an employee of Civic Studios while the employee was acting in an official capacity.
(b) All persons that visit any physical workplace of Civic Studios.

2. If the complaint is made against the employer, the IC shall, as far as possible, refer the case to the Local Complaints Committee.

3. If a prima facie[2] penal case exists, or if the complainant wishes to file a police complaint, the IC can assist them to forward the complaint to the police with the consent of the complainant.
4. If the complainant wishes to take legal action against the respondent, the IC can assist any such complainant with referrals of lawyers who can take forth the matter for them.
5. In case multiple companies and thereby multiple Internal Committees are involved:

(a) The complaint will be heard by the IC where the complainant prefers to file a complaint.

(b) In case the complainant so desires, a joint IC may be set up by the companies of the employees involved, with two member representatives from the ICs of each company and one external member forming the joint IC.

C. COMPOSITION OF INTERNAL COMMITTEE

1. In accordance with the location of Civic Studios' office, it has constituted an Internal Committee in Mumbai, Maharashtra.[3] The details of the members of the ICs are annexed as 'Annexure-I'.
2. If any complaint arises against the Presiding Officer or any of the members of the IC, the Presiding Officer or the member, as the case may be, will recuse themselves from the proceedings and an alternate member shall be appointed in their position to the committee to avoid any conflict of interest.
3. If any IC member breaks confidentiality or abuses their position in any manner, they will be replaced immediately once the matter is brought to the attention of other IC members or the employer and disciplinary action will be taken against them.
4. The IC members will hold their positions for a maximum of three years.
5. If an IC member completes their term, or wishes to resign from the IC for any reason, they are meant to submit a resignation letter to the HR head stating the reason.
6. The nomination of new members to the IC is overseen by the HR and head of the organization.

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[2] Prima facie: based on the first impression.

[3] All ICs will comprise of:

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

(b) Not less than two 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 member from amongst non-governmental organisations or associations committed to the cause of women or a person familiar with the issues relating to sexualharassment:

At least half of the nominated members must be women, for more details please refer to:
http://www.iitbbs.ac.in/notice/sexual-harrassment-of-women-act-and-rules-2013.pdf

D. REDRESSAL MECHANISM

In accordance with the procedures laid down by the Act and the Rules, the internal redressal mechanism is as follows:

D.1. FILING A COMPLAINT

1. The aggrieved woman shall file a written complaint with the IC. The complaint should include specific details of the incident(s) of sexual harassment: including a description of the incident(s), the date, timing, location of the incident(s), name of the respondent, and the work relationship between them. In case such complaint cannot be made in writing, the Presiding Officer or any Member of the Internal Committee shall render all reasonable assistance to the woman for making the complaint in writing;
2. The aggrieved woman shall submit six copies of the complaint to the IC, along with six attached copies of any supporting evidentiary documents, including the names and contact details of any witnesses she is presenting on her behalf. Complainants are advised to maintain a digital and physical copy of the complaint and supporting evidentiary documents for their personal records;
3. The complaint can also be submitted to the IC via email to poshatcs@gmail.com, by filling out the complaint form in physical or digital form (accessed digitally at https://bit.ly/poshcsform), or by post to Akshada Bhalerao (Presiding Officer), 411, 4th Floor, Jains Arcade, 14th Road, Khar (West), Mumbai, Maharashtra 400052, India
4. The IC will mandatorily provide a written acknowledgement on receipt of complaint;
5. The aggrieved woman must submit the complaint to the IC within three months of the incident of sexual harassment, in case the sexual harassment was recurring, the three month period is calculated from the last instance of such harassment;
6. The IC may provide an extension of upto three additional months for filing the complaint if it finds that the circumstances allow for it;
7. On receiving the complaint in writing, the IC will provide a copy of the complaint to the respondent within 7 days of receiving such a complaint;
8. The respondent is to respond in writing to the complaint made against them, with any supporting documents and names and addresses of witnesses they may present on their behalf, within 10 days to the IC.

D.2. FILING A COMPLAINT ON BEHALF OF SOMEONE

9. In case of physical inability of the aggrieved woman to file a complaint, a relative, friend, coworker, an officer of the National Commission for Women or State Women's Commission, or anyone who knows about the incident of sexual harassment can file the complaint with the written consent of the aggrieved woman;
10. In case of mental incapacity of the aggrieved woman to file a complaint, a relative, friend, special educator, a qualified psychiatrist or a psychologist, the guardian or authority under whose care she is receiving treatment or care can file a complaint or any person who knows about the incident of sexual harassment can file a complaint jointly with a relative, friend, special educator, a qualified psychiatrist or a psychologist, the guardian or authority under whose care she is receiving treatment or care;
11. In other situations, including the death of the aggrieved woman, a person appointed by the aggrieved woman or her legal heirs can make the complaint.

D.3. MUTUAL SETTLEMENT

13. In case the aggrieved woman wants to find a mutual settlement for her complaint, she can ask the IC for help with settling the matter through a mutual agreement between her and the respondent:

(a) Only the aggrieved woman can initiate a mutual settlement.
(b) The IC will help facilitate the mutual settlement and may appoint a neutral arbiter, if required.
(c) The settlement agreed upon cannot be in the form of a monetary compensation given by the respondent to the aggrieved woman.
(d) The aggrieved woman cannot be pressurised by any person or organisation to opt for a mutual settlement.

14. If a mutual settlement is reached, the IC will formulate a written record of the settlement and provide it to the employer for further action.
15. Both the aggrieved woman and the respondent have a right to receive a copy of the written record of the settlement.
16. Where a settlement is reached and the terms of the settlement are fulfilled in keeping with the conditions mentioned above, no further inquiry shall be conducted by the IC.
17. In case of breach of any terms of the settlement, the aggrieved woman may approach the IC for further action.

D.4. INQUIRY

18. In case a mutual settlement is not opted for, or after a breach of the mutual settlement, or in case a mutual settlement cannot be reached, the IC will undertake an investigation into the

complaint. The procedure it will follow for this investigation is in accordance with the Act and the Rules.

19. For the purpose of making an inquiry, the IC shall have the same powers as are vested in a civil court under The Code of Civil Procedure, 1908 when trying a suit in respect of the following matters, namely:
    (a) summoning and enforcing the attendance of any person and examining them on oath;
    (b) requiring the discovery and production of documents; and
    (c) any other matter which may be prescribed.
20. The aggrieved woman can choose to not be present at the same time as the respondent before the IC and IC proceedings may be held separately for both parties.
21. The cross examination of witnesses may be done virtually, if required, with the consent of the parties involved.
22. In case the persons involved would prefer in-person cross examination and testifying, Civic Studios or the organisation whose employees are parties to the complaint will bear the expenses of their travel and stay, if any, which the respondent may be asked to pay for, if found guilty.
23. The parties to the complaint are not allowed to appoint a lawyer to represent them at any stage of the proceedings.
24. If either the aggrieved woman or the respondent is not present for three consequent hearings, without sufficient cause, the IC is empowered to end the inquiry or give a decision. Any such notice of termination or of an ex parte decision may not be passed without giving a written notice to the party concerned, 15 days in advance.
25. It is mandatory for 75% of the IC members or 3 persons, whichever is lower, to be present at all hearings. The Presiding Officer shall be present at all hearings.
26. The IC will record all its proceedings in writing in as detailed a manner as possible.
27. The IC may record portions of or all of its proceedings in an audio visual format, only with the written consent of all parties involved. It is the duty of the IC to ensure that such audio visual material remains confidential.

D.5. SUPPORT TO THE AGGRIEVED WOMAN

Civic Studios will provide all reasonable support to the aggrieved woman, including but not limited to:

28. On receipt of a complaint, the aggrieved woman can immediately stop reporting to or working with the respondent, until the complaint is resolved;

29. If the IC receives a written request from the aggrieved woman, they can recommend to the employer that:
    (a) The aggrieved woman or the respondent be transferred to another workplace;
    (b) The aggrieved woman is to be given paid leave, of upto three months, in addition to any existing leave she may have. However, the aggrieved woman cannot be given leave or be transferred against her will;
    (c) The Respondent is restrained from reporting to or on the work of the aggrieved woman and instead assigns the same to another colleague who may be capable of doing so.
30. In case the complainant has been granted leave from work, the complainant may be required to work from home, if it is practicable, keeping in mind the nature of the work of the complainant, health and mental condition.
31. During or after such a complaint and inquiry, Civic Studios will take all steps to ensure that the work environment is not hostile for the aggrieved woman.
32. Civic Studios undertakes that any employee reporting a complaint under this policy will not be terminated merely on that ground.

D.6. FINAL REPORT

33. The IC may find (1) the respondent guilty, (2) not guilty or (3) find the evidence inconclusive, and will recommend action, accordingly.
34. The IC will complete its inquiry within 90 days from the date of receipt of the complaint and will provide its final findings and recommendations to both parties and to Civic Studios in writing within 10 days after completion of the inquiry.
35. Provided, where both parties are employees, before finalising its report, the IC shall share its findings with both the parties and provide them an opportunity to make a representation against the findings before the IC.
36. Once the employers receive the findings and recommendations of the IC, it will implement them within 60 days of such receipt in writing and send a report of such implementation to the IC;
37. The final report prepared by the IC will contain the following details:
    (a) A description of the different aspects of the complaint;
    (b) A description of the process followed;
    (c) A description of the background information and documents that support or refute each aspect of the complaint;
    (d) An analysis of the information obtained;
    (e) Findings; and,
    (f) Recommendations.

D.7. PUNISHMENT

38. Where the Internal Committee, arrives at the conclusion that the allegation against the respondent has been proved, it may recommend one or more of the following actions in its final report:
    (a) Written apology;
    (b) Disciplinary action;
    (c) Debarring from supervisory duties;
    (d) Suspension;
    (e) Dismissal;
    (f) Cancellation of specific work assignments;
    (g) Community service;
    (h) Warning;
    (i) Counselling;
    (j) Reprimand or censure;
    (k) Withholding of promotions;
    (l) Withholding of pay or increments; or
    (m) Termination of their service.
39. The IC can recommend monetary compensation be paid by the respondent, which will be deducted from the salary of the respondent if they do not pay it directly.
40. In case the employer is unable to make such deduction from the salary of the respondent due to them being absent from duty or cessation of employment it may direct the respondent to pay such sum to the aggrieved woman. In case the respondent fails to pay the sum referred to, the Internal Committee may forward the order for recovery of the sum as an arrear of land revenue to the concerned District Officer.

D.8. MONETARY COMPENSATION

41. The IC can direct the employer to deduct from the salary or wages of the respondent, such sum as it may consider appropriate to be paid to the aggrieved woman or to her legal heirs, as it may determine, in accordance with:
    (a) Mental trauma, pain, suffering, and emotional distress caused to the aggrieved woman;
    (b) Any loss in career opportunities because of the incident of sexual harassment;
    (c) Medical treatment (physical or psychiatric) that the aggrieved woman may require;
    (d) The respondent's income and general financial status;
42. The IC can decide whether this money should be paid over time in instalments or all at once.

D.9. APPEAL

43. Any person not satisfied with the findings or recommendations of the IC or non-implementation of the recommendations, may appeal in an appropriate court or tribunal in the the city of Mumbai, Maharashtra, within 90 days of the recommendations being made by the IC;
44. An appeal can be made by the respondent or by the aggrieved woman.

E. CONFIDENTIALITY

45. The contents of the complaint made, the identity and addresses of the aggrieved woman, respondent and witnesses, any information relating to conciliation and inquiry proceedings, recommendations of the IC and the action taken by the employer shall not be published, communicated or made known to the public, press and media in any manner. Only the justice secured to the complainant may be made known under the reports required to be furnished under the law.
46. Breach of this provision by any member of the IC, the respondent or the complainant can lead to disciplinary action such as a written apology, warning, reprimand or censure, withholding of promotion, withholding of pay rise or increments, terminating from service or undergoing a counselling session or carrying out community service. In addition, Civic Studios may proceed against those involved in the breach of this provision in further civil, criminal or other legal proceedings, not restricted to defamation.
47. Breach of provisions in point 45 by any IC member can also amount to a financial penalty upto INR 20,000.
48. However, Civic Studios may share details of cases in a strictly anonymised format as learning tools or for public documentation purposes.

F. FALSE COMPLAINTS

49. The process for determining a false complaint will be the same as for determining a case of sexual harassment and will be heard by the IC. The possible punishments will remain the same as those for a case of sexual harassment.

50. A mere inability to provide adequate proof to substantiate a complaint will not attract any penalty and will not be considered a false complaint unless proven otherwise.
51. The person making the claim regarding the said complaint being a false complaint has to provide proof to the IC, who will then investigate and provide recommendations to the employer.

G. ALTERNATE REMEDIES

52. The aggrieved woman has the right to file a criminal complaint against the accused, instead of or in addition to filing a complaint with the IC.

H. PERSONAL RESPONSIBILITY MEASURES

53. These are some other measures that Civic Studios will undertake to ensure that it is a safe environment for all the people that work and that interact with it in any manner:
    a. This Policy shall be disseminated to each employee of the company as well as new recruits who shall acknowledge that they have read and understood the Policy and that they shall abide by the Policy.
    b. The legal consequences of sexual harassment will be prominently displayed at each location of Civic Studios, along with details of the constitution and contact details of the relevant IC, in a location where it will be clearly visible to employees, members and visitors.
    c. There will be mandatory legal awareness, gender sensitisation and anti-sexual harassment training for all employees of Civic Studios.
    d. In case of any complaints of incidents of sexual harassment at Civic Studios, Civic Studios will make every effort to provide support to the aggrieved woman, ensure attendance of requisite persons at IC hearings, and share related information with the IC.
    e. The company will provide assistance to the aggrieved woman if she chooses to file a complaint in relation to the offence under the Indian Penal Code, 1860 or any other law for the time being in force.
    f. Civic Studios will monitor the timely submission of reports by the IC.
    g. Civic Studios will submit an annual report to the appropriate government, detailing cases of sexual harassment reported to its IC and action taken, in compliance with legal requirements.

I. NON INTERFERENCE IN THE WORKINGS OF THE IC

54. No employee of Civic Studios will interfere with the workings of the IC, if any employee is found guilty of doing so, disciplinary action can be taken against them;
55. The Civic Studios Board of Directors will not interfere with the workings of the IC, any such interference can result in legal liability for them and Civic Studios.

J. ANNUAL REPORT BY THE IC

56. The IC will prepare and file an annual report, it 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 complaints pending for more than 90 days;
    d. Number of workshops or awareness programme against sexual harassment carried out;
    e. Nature of action taken by the employer.

Civic Studios *is bringing this policy into effect with the intent of creating safer and more inclusive workplaces. In case of a situation arising that is not covered by this policy, it shall make all attempts to provide support to the aggrieved woman and undertake a just and fair course of action.*

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ANNEXURE I

According to the internal memo dated March 29th 2025 issued by Civic Studios, the composition of the Internal Committee is as follows:

#	Name	External/Internal Member and Designation
1	Akshada Bhalerao	Presiding Officer
2	Kashmira Patil	Internal Member
3	Nishkal Vaidya	Internal Member
4	Vaidehi Barve	External Member

The members of the Internal Committee can be reached on the specific email address assigned for the purpose of its functioning, which is poshatcs@gmail.com.

ANNEXURE II

Civic Studios will use their discretion to allow complaints of sexual harassment by persons that identify as men, trans persons, and non binary persons, to be heard by the constituted IC. It will put forth resolutions for the complaints following the same redressal procedures as above.

It is important to note that owing to the Sexual Harassment of Women at Workplace Act 2013 only recognises cis-gendered women as aggrieved persons, these proceedings will not fall within the purview of, or be governed by, the PoSH Act. They shall be a matter of internal company policy. Hence, in the event of any such aggrieved person not being satisfied with the findings or recommendation of the IC, they will not be able to appeal in an appropriate court or tribunal under the Sexual Harassment of Women at Workplace Act 2013.

However, the person will be able to put forth an appeal through an independent lawyer under other relevant laws and provisions of the Indian Law.