

PREVENTION OF SEXUAL HARASSMENT (POSH) POLICY

CALIFORNIA SOFTWARE COMPANY LIMITED

This revised Prevention of Sexual Harassment (POSH) Policy has been prepared for California Software Company Limited in accordance with the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and applicable corporate governance standards.

1. PREAMBLE

California Software Company Limited (“the Company” or “Calsoft”) is committed to providing a safe, secure, respectful, and inclusive work environment free from sexual harassment, discrimination, intimidation, retaliation, or hostile conduct.

2. OBJECTIVES

- Prevent sexual harassment at workplace
 - Promote dignity and equality at workplace
 - Establish fair grievance redressal mechanism
 - Ensure confidentiality and protection against retaliation
 - Promote awareness and gender sensitization
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3. APPLICABILITY

This Policy applies to:

- Permanent employees
 - Temporary employees
 - Contract employees
 - Consultants and retainers
 - Interns and trainees
 - Vendors, clients, and visitors
 - Employees working remotely or travelling for business
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4. DEFINITION OF SEXUAL HARASSMENT

Sexual harassment includes any unwelcome act or behavior such as:

- Physical contact or advances
 - Demand or request for sexual favors
 - Sexually colored remarks
 - Showing pornography or offensive content
 - Inappropriate verbal, written, digital, or non-verbal conduct
 - Offensive jokes, gestures, stalking, intimidation, or messages
 - Workplace bullying linked to gender or sexuality
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5. WORKPLACE

Workplace includes:

- Company offices and premises
 - Virtual workplaces and online meetings
 - Client locations
 - Business travel and accommodation
 - Company-sponsored events and gatherings
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6. RIGHTS OF EMPLOYEES

Every employee has the right to:

- Work in a safe and respectful environment
 - Raise concerns without fear of retaliation
 - Receive fair and confidential treatment
 - Seek assistance from Internal Committee
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7. INTERNAL COMMITTEE (IC)

The Company shall constitute an Internal Committee comprising:

- Presiding Officer – Senior woman employee
- Minimum two employee members
- One external member from NGO/legal/social work background

At least 50% of the members shall be women.

8. COMPLAINT MECHANISM

Complaints may be submitted:

- In writing within 3 months of occurrence
- Through email or written application
- To any Internal Committee member

Email Reporting: whistleblower@calsoftgroup.com

9. ENQUIRY PROCESS

- Acknowledgement of complaint shall be provided
 - Fair opportunity shall be provided to both parties
 - Confidential enquiry shall be conducted
 - Enquiry shall be completed within timelines prescribed under law
 - Recommendations shall be submitted to management
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10. INTERIM RELIEF

During pendency of enquiry, the Internal Committee may recommend:

- Transfer of parties
 - Leave to aggrieved person
 - Restriction on direct interaction
 - Temporary reporting structure change
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11. DISCIPLINARY ACTION

Based on findings, disciplinary action may include:

- Warning or reprimand
 - Written apology
 - Counselling
 - Transfer or suspension
 - Termination of employment
 - Deduction of compensation where applicable
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12. FALSE OR MALICIOUS COMPLAINTS

False or malicious complaints knowingly made with malicious intent may attract disciplinary action. However, inability to substantiate complaint shall not automatically attract action.

13. CONFIDENTIALITY

All complaints, proceedings, evidence, reports, and recommendations shall be treated as strictly confidential in accordance with applicable laws.

14. PROTECTION AGAINST RETALIATION

The Company prohibits retaliation against complainants, witnesses, Internal Committee members, or participants in the enquiry process.

15. AWARENESS & TRAINING

The Company may conduct:

- POSH awareness programmes
 - Employee sensitization sessions
 - Leadership workshops
 - Compliance and ethics training
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16. RECORDS & REPORTING

The Company shall maintain:

- Complaint records
 - Investigation reports
 - Annual POSH disclosures
 - Compliance documentation
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17. ANNUAL DISCLOSURES

The Company shall make disclosures in Annual Reports and statutory filings as required under the POSH Act and Companies Act, 2013.

18. REVIEW & AMENDMENT

This Policy may be reviewed and amended by the Board or HR Department based on legal, regulatory, or organizational requirements.

19. EFFECTIVE DATE

This revised POSH Policy shall come into effect upon approval by the Board of Directors of California Software Company Limited.

APPROVAL

Approved by the Board of Directors of California Software Company Limited.

Revised Date: April 10, 2026

Place: Chennai, Tamil Nadu, India

Chairman / Managing Director
Authorized Signatory