

17000 ft Foundation

Transforming our Frontier Villages

Every person has the right to work in dignity — without fear, without harassment, without exception

POLICY ON PREVENTION OF SEXUAL HARASSMENT AT THE WORKPLACE

Version 2.0 | Ref: 17000ft/POSH/2026-01 | Effective 1 June 2026

Supersedes 17000ft/POSH/2024-01 (April 2024)

Document Details	
Ref. No.	17000ft/POSH/2026-01
Prepared by	Director - Development
Approved by	Board of Directors, 17000 ft Foundation
Effective date	1 June 2026
Review cycle	Annual — next review due 31 March 2027
Version	2.0 (supersedes 17000ft/POSH/2024-01, April 2024)
Applicability	All employees, consultants, volunteers, interns, associates — all locations
Geographic scope	All 17000ft locations. e.g.: Ladakh (Leh & Kargil), Sikkim, Arunachal Pradesh, HO Gurugram etc.
Primary statute	Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013
CIN	U93000HR2012NPL068450

Section 1: Introduction and Commitment

17000 ft Foundation is a non-profit organisation committed to improving the lives of people living in remote and isolated regions of India — especially in the area of education in the Indian Himalayan Region. At the Foundation, we have zero tolerance for sexual harassment and any related behaviour.

The Foundation recognises the right of every team member and employee to attend work and perform their duties without being subjected to any form of sexual harassment. It is equally the obligation and responsibility of every person associated with the Foundation — employee, consultant, volunteer, or visitor — to ensure that the workplace is free from sexual harassment. The Foundation is fully committed to providing a safe, secure, and enabling work environment for all individuals, irrespective of their gender or hierarchy, emphasising fairness and inclusivity.

The Foundation is aware that workplace sexual harassment is a form of gender discrimination which violates a person's fundamental right to equality and right to life, guaranteed under Articles 14, 15, and 21 of the Constitution of India. It is a form of abuse of power that has no place in an organisation committed to the dignity of every person — including the children and communities we serve.

The Foundation adheres fully to the provisions of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (POSH Act) and the Rules framed thereunder. While the POSH Act is women-specific, through this gender-neutral policy the Foundation extends equivalent protections to persons of all genders and sexual orientations. This gender-neutral commitment is an expression of the Foundation's values — it does not alter or reduce the legal obligations and protections the POSH Act confers specifically on women.

1.1 Objectives of This Policy

- To protect the right to equality and dignified livelihood for every person associated with the Foundation
- To foster a socially, physically, and psychologically safe environment that will enable all employees and associates to work productively
- To strive for gender justice at both institutional and programmatic levels
- To establish a clear, accessible, and trustworthy mechanism for raising and resolving complaints of sexual harassment
- To require all employees and partners to be sensitive to cultural differences and aware of their behaviour towards others in work-related settings

1.2 Changes from Previous Version (April 2024)

Version 2.0 incorporates the following material changes from the April 2024 policy:

- Arunachal Pradesh added to geographic scope — IC now includes representation for Arunachal Pradesh
- IC member contact details depersonalised — dedicated institutional email replaces personal mobile numbers in the distributed policy
- IC term extended from three to five years, consistent with the CPC and sector norms
- Six-copy filing requirement replaced with single written complaint or email

- Interim orders: IC may recommend measures on its own motion, not only on written request
- Appeal mechanism extended to all genders, consistent with the gender-neutral policy
- Digital and online harassment section added
- Field isolation provisions added for remote deployment contexts
- Survivor support provisions added
- Training requirements specified in detail
- Unilateral amendment clause replaced with a lawful amendment provision

Section 2: Scope of This Policy

This policy extends to all employees, consultants, volunteers, interns, and associates of the Foundation, regardless of their gender or sexual orientation.

In addition, as intended under the POSH Act, this policy also extends to women who may or may not be employees of the Foundation but who may be affected in the course of any activity related to the Foundation's work. Such women may include project beneficiaries, visitors, vendors, suppliers, external consultants, parents/guardians of children, training experts, NGO staff, government officials in contact with Foundation staff, teachers, interns, volunteers, candidates participating in recruitment processes, and any other person at any workplace as defined below.

This policy covers conduct at any Workplace — which includes all offices, branches, schools, and project locations of the Foundation, as well as client sites, field visits, outstation travel, accommodation, conferences, meetings, events, and any place where an employee travels for Foundation-related work, including the travel itself. The workplace definition is intentionally broad — it reflects the reality that 17000ft's staff regularly work in isolated field settings far from office environments.

Section 3: Terminology

3.1 Key Terms

Aggrieved Individual / Complainant: Any person of any gender or sexual orientation employed with the Foundation, or any woman who may or may not be employed with the Foundation, who alleges to have been subjected to any act of sexual harassment by the Respondent at the Workplace.

Respondent: Any person against whom a complaint of sexual harassment has been made by the Aggrieved Individual at the Workplace.

Employee: Any person on the staff, whether employed on a regular, temporary, ad-hoc, or daily wage basis, either directly or through an agency, including a contractor, for remuneration or not, and those working on a voluntary basis, with or without express or implied terms of employment or contract.

Employer: The principal employer — any individual or Board or committee of the Foundation responsible for the management, supervision, and control of the Foundation's work and the Workplace, including the formulation and administration of policies.

Workplace: All offices, branches, workshops, schools, and project locations of the Foundation, and also all external locations visited by a person due to or during employment with the Foundation — including client sites, field visits, outstation travel, accommodation, conferences, meetings, events, and any mode of transport provided by the Foundation for undertaking such visits.

Internal Committee (IC): The committee constituted by the Foundation under the POSH Act, 2013 for the redressal of complaints of sexual harassment at the Workplace.

3.2 Definition of Sexual Harassment

Sexual Harassment means any unwelcome act or behaviour — whether directly or indirectly — that amounts to physical contact and advance, a demand or request for sexual favours, sexually coloured remarks, or any other conduct of a sexual nature which makes a person feel offended, humiliated, or intimidated, or where such a reaction is reasonable in the circumstances. Sexual harassment includes but is not limited to:

(i) Verbal — Written or Oral

Sexually coloured remarks relating to appearance, body, or clothes; indecent remarks; questions or comments about a person's sex life; requests for sexual favours; sexual demands; promises or threats concerning a person's employment conditions in return for sexual favours.

(ii) Non-Verbal

Looking or staring at a person's body in a sexual manner; display of sexually explicit material — calendars, pin-ups, magazines, computer screens, or pornography; sexually coloured gestures;

making sexual jokes; sending offensive materials digitally through messages, email, WhatsApp, social media, or any other digital channel.

(iii) Physical

Physically touching, pinching, hugging, caressing, kissing, or any form of sexual assault.

(iv) Digital and Online

Harassment that occurs through digital or electronic means is equally a form of sexual harassment, regardless of whether it takes place during office hours or at a physical workplace. This includes:

- Sending sexually explicit, offensive, or threatening messages, images, or videos through any digital channel — email, WhatsApp, Instagram, any messaging platform
- Cyberstalking — repeatedly sending unwanted digital communications after the recipient has indicated they do not wish to receive them
- Creating, sharing, or distributing intimate or sexual images of a person without their consent — including AI-generated images
- Making sexually offensive comments on a person's social media posts or profiles
- Harassment that continues digitally after an in-person incident — for example, a respondent who continues to contact a complainant digitally after an initial incident has occurred

The following circumstances associated with any act or behaviour of sexual harassment also constitute sexual harassment:

- Implied or explicit promise of preferential treatment in employment
- Implied or explicit threat of detrimental treatment in employment
- Implied or explicit threat about a person's present or future employment status
- Interference with work or creating an intimidating, offensive, or hostile work environment
- Humiliating treatment likely to affect a person's physical or mental health or sense of safety or security

Section 4: Internal Committee (IC) — Constitution and Governance

4.1 Constitution

The Foundation has constituted an Internal Committee (IC) to deal with complaints of sexual harassment in accordance with the POSH Act, 2013. The IC has the following members:

S.No.	Name	Role	Location	Institutional Contact
1.	Radha Raj	Presiding Officer	Gurugram HO	17000ft.ic@17000ft.org
2.	Anjali Velhankar	Member	Gurgaon	anjali.velhankar@17000ft.org
3.	Palmo Tsering	Member	Ladakh	palmo.tsering@17000ft.org
4.	Ranveer Phukan	Member	Gurgaon	ranveer.phukan@17000ft.org
5.	Abdullah Khan	Member	Ladakh	abdullah.khan@17000ft.org
6.	Phuntsog Namgyal Bhutia	Member	Sikkim	phuntsog.namgyal@17000ft.org
7.	Avinash Tamang	Member	Arunachal Pradesh	avinash.tamang@17000ft.org
8.	Swati Pant	External Member	AHEM	swati@ahem.org.in

For privacy and security reasons, personal mobile numbers of IC members are not published in this Policy document. The IC may be contacted at 17000ft.IC@17000ft.org — this is a monitored, confidential inbox managed by the Presiding Officer. Personal contact details of IC members are maintained by HR and are available on request in genuine urgency situations.

4.2 Composition Requirements

The IC is constituted in accordance with Section 4 of the POSH Act, 2013. The following composition requirements apply:

- The Presiding Officer must be a woman employed at a senior level at the Foundation
- At least two members must be from among employees, committed to the cause of women, or who have experience in social work or legal knowledge
- The external member must be from an NGO or association committed to the cause of women, or a person familiar with issues relating to sexual harassment
- Not less than half the total members of the IC must be women

4.3 Term, Vacancy, and Termination

- The Presiding Officer and every member of the IC shall hold office for a period of five years, which may be renewed for a further term after appraisal of the IC's past performance by Management
- Any vacancy arising in the IC must be filled within one month. It is the responsibility of the Presiding Officer to follow this up and inform Management. Where the Presiding Officer's seat is vacant, any sitting member of the IC may temporarily discharge the responsibility of the Presiding Officer until the vacancy is filled

- The external member shall be paid an allowance and travel reimbursement, to be decided by Management from the Foundation's accounts
- The IC may seek the advice of any non-profit or third party it feels will be able to provide special assistance in dealing with specific cases
- Any IC member's role may be terminated if they breach the provisions of this Policy, fail to maintain confidentiality, or otherwise act in a manner inconsistent with the IC's obligations

4.4 Duties of the IC

The IC is responsible for:

- i. Investigating and addressing all complaints of sexual harassment filed under this Policy
- ii. Organising and carrying out workplace safety sensitisation programmes for employees, members of the IC, and Management, through workshops, seminars, and awareness materials, at least once in a calendar year
- iii. Drafting, reviewing, or amending this Policy from time to time to comply with any laws, rules, or regulations related to sexual harassment
- iv. Ensuring that the penal consequences of sexual harassment and the IC's contact details are displayed prominently at all Foundation office locations
- v. Assisting the Aggrieved Individual, if they so wish, in filing a complaint or FIR with the police where the inquiry has found the Respondent guilty
- vi. Preparing and submitting the annual report, as prescribed by the POSH Act, to the Employer and to the District Officer for each location where the Foundation operates with more than 10 employees
- vii. Collating and reviewing statistical details received by the IC across all locations
- viii. Monitoring compliance with this Policy and recommending improvements to Management

Section 5: Filing a Complaint

5.1 How to File

An Aggrieved Individual may make a complaint of sexual harassment at the Workplace to the Internal Committee. Complaints may be submitted in the following ways:

- By email to 17000ft.ic@17000ft.org — the IC's dedicated confidential inbox
- In writing — a letter or written document addressed to the Presiding Officer or any IC member
- In person — by meeting with the Presiding Officer or any IC member
- Through any IC member at any location — field-based employees may approach the IC member for their region

The complaint must contain: a description of the incident(s) of sexual harassment; the date(s) and location(s); the identity of the Respondent; the names and contact details of any witnesses; and any supporting documents or evidence the Aggrieved Individual wishes to submit. The complaint need not follow any prescribed format — the IC will assist the Aggrieved Individual in putting the complaint in writing if required.

5.2 Time Limit for Filing

- The complaint must be made within three months from the date of the incident, or within three months of the last incident in a series of incidents
- The IC may extend this period up to six months where it is satisfied that circumstances were such that the Aggrieved Individual was unable to file within the prescribed period
- Where the Aggrieved Individual is prevented from filing by physical or mental incapacity, the complaint may be filed by a person who has knowledge of the incident, with the written consent of the Aggrieved Individual

5.3 Filing from Remote Field Locations

The Foundation recognises that employees in remote field locations may face practical challenges in filing a complaint — including lack of connectivity, geographic isolation, and the absence of a senior colleague to approach. The following provisions apply:

- An Aggrieved Individual in a remote field location may file an initial complaint verbally — by contacting any IC member or the Presiding Officer — followed by a written confirmation within 5 working days of regaining connectivity or returning to a location where writing is practicable
- The three-month filing period is tolled (paused) during periods where the Aggrieved Individual is in a location with no connectivity — the period resumes from the date of their return to connectivity
- Where the Respondent is the most senior Foundation person in the field location, the Aggrieved Individual may bypass the local chain of command entirely and contact the Presiding Officer directly at 17000ft.ic@17000ft.org

5.4 Anonymous Complaints

At no time will an anonymous complaint be investigated by the IC. The complainant's and respondent's identities will be known to the people directly involved in the inquiry — IC members, witnesses, and the employer. However, the identities of all parties are fully protected

from broader disclosure, including from other colleagues, press, and social media, as set out in Section 9.

Section 6: Conciliation

- ix. Prior to initiating any inquiry, the IC shall inform the Aggrieved Individual of their right to settle the matter through conciliation.
- x. Where the Aggrieved Individual requests to settle the matter through conciliation, the IC shall hold a meeting or series of meetings to arrive at a settlement between the Aggrieved Individual and the Respondent. The IC shall ensure that no monetary or underhanded settlement is made as a basis of conciliation.
- xi. The Aggrieved Individual may, at any time prior to a settlement being arrived at, submit in writing that they wish to withdraw from the conciliation proceedings and initiate a formal inquiry.
- xii. Where a settlement is arrived at, the IC shall record the settlement and forward copies to the Aggrieved Individual, the Respondent, and the Employer for action.
- xiii. Where a settlement is arrived at between the parties, no further inquiry shall be conducted by the IC, except where the Aggrieved Individual informs the IC that the terms of the settlement have not been complied with.

Conciliation is an option offered to the Aggrieved Individual — it is never obligatory. An Aggrieved Individual who does not wish to pursue conciliation may proceed directly to the formal inquiry at any stage. The IC must never pressure or persuade an Aggrieved Individual to pursue conciliation against their preference.

Section 7: Formal Inquiry

7.1 Initiation of Inquiry

In the event of no settlement being arrived at, or any term or condition of a settlement not being complied with, or where the Aggrieved Individual does not wish to pursue conciliation, the IC shall initiate a formal inquiry into the complaint — only after determining that the complaint, as made, is of 'sexual harassment' and falls within the IC's jurisdiction.

7.2 Inquiry Procedure

- i. The IC shall send a copy of the complaint to the Respondent by email and/or registered post within seven working days of receipt.
- ii. The Respondent shall file a written reply to the IC, along with supporting documents and names and contact details of witnesses, within ten (10) working days of receipt of the complaint — not later than 15 working days.
- iii. The IC shall hold an inquiry on the basis of the complaint of the Aggrieved Individual and the written reply of the Respondent.
- iv. The IC shall have the following powers while conducting an inquiry:
 - (a) summoning and enforcing the attendance of any person and examining them;
 - (b) requiring the discovery and production of any document;
 - (c) and receiving evidence in any form it deems appropriate.
- v. In conducting the inquiry, a minimum of three members of the IC, including the Presiding Officer, shall be present.
- vi. Both parties shall be given an opportunity of hearing. However, they shall not be allowed to be represented by an advocate during any stage of the inquiry.
- vii. Extreme care must be taken while recording the testimony of the Aggrieved Individual — a trauma-informed, sensitive approach must be used at all times. Where required, a specialist (psychologist or counsellor) may be called by the IC to assist.
- viii. Where either party fails to present themselves for three consecutive hearings without sufficient cause, the IC may close the inquiry proceedings or pass an ex-parte order. Such an order shall not be passed without giving a fifteen-day notice to the absentee party.
- ix. The inquiry shall be completed within a period of ninety days.
- x. The conclusions of the IC will be communicated to both parties in writing following the inquiry. These conclusions will recommend action(s) to be carried out by the Board of Directors of 17000 ft Foundation.

7.3 Trauma-Informed Approach

All IC members must approach the inquiry process with a trauma-informed, non-judgmental, and survivor-centred orientation:

- The Aggrieved Individual must never be required to confront the Respondent directly during the inquiry
- The Aggrieved Individual has the right to have a support person of their choice present at any stage of the inquiry. The support person may be required to sign a non-disclosure/confidentiality agreement and is expected to hence maintain confidentiality during and after the inquiry process

- The IC must not ask questions that imply the Aggrieved Individual's conduct or appearance contributed to the harassment
- The IC must take note of the power dynamics between the parties — where the Respondent is senior to the Aggrieved Individual, the IC must be especially alert to the possibility of intimidation
- The IC must not suggest, imply, or request that the Aggrieved Individual 'reconsider' their complaint or maintain silence for the sake of team harmony

Section 8: Interim Measures During Inquiry

During the pendency of the inquiry, the IC may — either on the written request of the Aggrieved Individual or on its own assessment of the circumstances — recommend to the Employer interim measures for the safety and wellbeing of the Aggrieved Individual. The IC's authority to recommend interim measures is not dependent on a written request from the Aggrieved Individual — the IC may act on its own motion where the situation warrants it.

Interim measures may include:

- Transfer of the Aggrieved Individual or the Respondent to a different team, location, or reporting line
- Grant of leave to the Aggrieved Individual for such period as the IC may consider necessary
- Restraint on the Respondent from communicating with the Aggrieved Individual during the pendency of the inquiry
- Adjusted supervision or reporting arrangements
- Any other measure the IC considers necessary for the Aggrieved Individual's safety and wellbeing

The Employer shall implement the recommendation of the IC and send a report of such implementation to the IC within five working days of receiving the recommendation.

Section 9: Inquiry Report and Possible Outcomes

9.1 Inquiry Report

- i. On completion of the inquiry, the IC shall record its findings in writing.
- ii. Where the IC finds that the allegation against the Respondent has not been proved, it shall recommend to the Employer that no action is required.
- iii. Where the IC finds that the allegation has been proved, it shall recommend to the Employer one or more of the following actions:
 - In case of a first-time offender and where the offence is of lesser gravity: issue a warning and direct that a written apology be submitted by the Respondent to the Aggrieved Individual
 - In case of a repeat offender, or where the offence is of a grave nature, one or more of: issue of censure; withholding of promotion or any increment; suspension of services without salary for such period as the IC may deem fit; and/or termination of employment
- iv. In addition to the above, the IC may recommend payment of proportionate compensation to the Aggrieved Individual by the Respondent. In determining the proportion of compensation, the IC shall consider:
 - a. the mental trauma suffered by the Aggrieved Individual;
 - b. loss in career opportunity due to the incident;
 - c. medical expenses incurred for physical or psychiatric treatment; and
 - d. income and financial status of the Respondent.Payment may be in lump sum or in instalments.
- v. The IC shall submit a report of its findings and recommendations to the Employer and both concerned parties within ten working days of the completion of the inquiry.
- vi. The Employer shall act upon the IC's recommendations within sixty working days of receipt of the report.

9.2 False and Malicious Complaints

Where the IC arrives at a conclusion that the allegation against the Respondent is malicious, or the Aggrieved Individual or any other person has made the complaint knowing it to be false, or produced forged or misleading documents, the IC may recommend to the Employer to take appropriate disciplinary action against the person.

The threshold for 'malicious' or 'false' is high and must be applied with great caution. A complaint that is not proved for lack of evidence is not the same as a false complaint. An Aggrieved Individual who was genuinely harassed but is unable to produce corroborating evidence must not be penalised. The false complaint provision exists for complaints made knowingly in bad faith — not for complaints that are unsubstantiated. The IC must never use the false complaint provision as a deterrent to reporting.

Section 10: Appeal

Any person aggrieved by the order of the IC — or due to non-implementation of the IC's recommendations by the Employer — may file an appeal to the appropriate appellate authority within ninety days from the date of receipt of the IC's recommendations or final report.

The appropriate appellate authority is:

- For employees in Ladakh (Leh and Kargil): the appellate authority as designated under the applicable Jammu and Kashmir / UT Ladakh rules under the POSH Act
- For employees in Sikkim: the appellate authority designated under Sikkim state rules under the POSH Act
- For employees in Arunachal Pradesh: the appellate authority designated under Arunachal Pradesh state rules under the POSH Act
- For employees at Gurugram HO: the Labour Commissioner or appellate authority under Haryana rules under the POSH Act

The appeal right under this section applies to persons of all genders — not only to women, as stated in the April 2024 policy. The Foundation's gender-neutral policy commitment means that all persons whose complaint was addressed by the IC have the right of appeal. The legal appeal mechanism under the POSH Act is available to women as a statutory right — persons of other genders may seek equivalent redress through appropriate civil or labour law channels.

Section 11: Provisions for Field Isolation Contexts

17000 ft Foundation recognises that field staff — particularly programme facilitators in remote schools — sometimes work in small teams in geographically isolated settings with limited access to the IC, limited connectivity, and concentrated power dynamics. The following provisions specifically address this context:

11.1 Field-Specific Risk Awareness

Field settings create specific sexual harassment risks that differ from office environments:

- Small teams with limited oversight — where the most senior person at a remote site may be the only authority figure available
- Shared accommodation during outstation deployments — where the boundaries between professional and personal space may be less clear
- Government officials, community members, or vendors present at field sites who are not Foundation employees but who interact with Foundation staff in a work context
- Extended periods away from the main office — which may normalise inappropriate behaviour that would be more visible in an office setting

11.2 Field-Specific Protections

- Shared accommodation during field deployments must maintain gender-appropriate arrangements — this is the responsibility of the Field Centre Head to ensure during deployment planning
- Where a field staff member experiences harassment from a government official, community member, or vendor, the Foundation's IC has jurisdiction over the Foundation's response — the employee should report to the IC and the Foundation will manage the external relationship accordingly
- The Presiding Officer is accessible directly by field staff at 17000ft.IC@17000ft.org — field staff do not need to go through their Field Centre Head to report to the IC

Section 12: Survivor Support and Wellbeing

The Foundation acknowledges that an experience of sexual harassment, and the process of reporting and inquiry that follows, is deeply stressful and can have significant mental health implications. The following support provisions are available to the Aggrieved Individual:

- The right to have a support person of their choice present at every stage of the inquiry process — this person may provide emotional support but does not act as a legal advocate
- Confidential welfare check-ins from the Head HR during the inquiry period — available on request from the Aggrieved Individual
- Reasonable adjustments to working arrangements during the inquiry period, in addition to any formal interim measures recommended by the IC
- Access to an external counsellor or psychosocial support service — where the Foundation's resources permit, and facilitated by the Head HR
- Protection from having to interact with the Respondent during the inquiry — the IC will ensure that the inquiry process does not require direct confrontation between the Aggrieved Individual and the Respondent

These support provisions are available to the Respondent as well, to the extent that the inquiry process creates stress and uncertainty for them. The Foundation's commitment to fairness extends to both parties in the inquiry.

Section 13: Privacy and Confidentiality

- i. All persons participating in the inquiry proceedings conducted by the IC — including IC members, the Aggrieved Individual, the Respondent, and witnesses — shall observe strict secrecy and confidentiality of all proceedings.
- ii. The following information must not be shared with any person outside the IC inquiry, except as required by law: the contents of the complaint; the identity and address of the Aggrieved Individual, Respondent, and witnesses; any information relating to conciliation and inquiry proceedings; the recommendations of the IC; and the action taken by the Employer.
- iii. Dissemination of information pertaining to justice secured by the Aggrieved Individual is permissible only where it does not disclose the name, address, identity, or any particulars that could result in the identification of the Aggrieved Individual, Respondent, or witnesses.
- iv. Under no circumstances shall the content of a complaint, the identities of any party to the inquiry, or the IC's recommendations be made known to other members of the Foundation's staff, to the public, or to the press or media.
- v. Where any IC member contravenes the above confidentiality provisions, they shall be subject to the penalty prescribed under the POSH Act (currently INR 5,000 payable to the Employer) — and may additionally be subject to disciplinary action under the Employee Code of Conduct v1.1. The determination of whether a breach has occurred and the imposition of the penalty will be made by the Director, following a written opportunity for the IC member to respond.
- vi. Any violation of confidentiality by any other party — including witnesses and employees with knowledge of the proceedings — may result in disciplinary action.

Section 14: Protection Against Retaliation

The Foundation shall ensure that no Aggrieved Individual, Complainant, Respondent, witness, or any other person involved in the complaint process shall be subject to any retaliation, victimisation, discrimination, or prejudice by the Employer, the IC, or any other person — for making a complaint, participating in the inquiry, supporting a complainant, or opposing sexual harassment.

Any person who engages in such retaliation, victimisation, discrimination, or prejudice shall be liable for disciplinary action by the Employer or the IC, as the case may be — up to and including termination of employment.

Retaliation can be subtle. It includes — but is not limited to — negative performance reviews, removal from desired assignments, social exclusion, or increased scrutiny that closely follows a complaint or inquiry participation. The IC and the Head - HR will be alert to these patterns. Any employee who believes they have been retaliated against for participation in a POSH complaint process should report this to the Presiding Officer at 17000ft.IC@17000ft.org or directly to the Director.

Section 15: Training and Awareness

Awareness and sensitisation are the most effective tools for preventing sexual harassment. The Foundation commits to the following mandatory training programme:

Training requirement	Details
Induction training — all new employees	All new employees must complete POSH awareness training within 30 days of joining. Training covers: definition of sexual harassment, what constitutes the workplace under this Policy, how to report, IC contact details, and good practices. Completion is tracked by HR.
Annual awareness session — all employees	At least one workplace safety sensitisation session per calendar year for all employees, at all locations. Format may include workshop, webinar, poster display, or combination. Attendance is mandatory and tracked.
IC member training	All IC members must complete specialised training on inquiry conduct, trauma-informed approaches, and POSH Act procedures — at induction and annually thereafter. The Presiding Officer is responsible for arranging this.

Training completion is a mandatory component of the annual performance review. Non-completion without documented reason will be escalated to the Head of HR.

In addition, the Foundation shall display at conspicuous places in all offices and field centres: the penal consequences of sexual harassment; the IC's contact details (17000ft.IC@17000ft.org); and the fact that every person has the right to file a complaint.

Section 16: Duties of Employees, Consultants, and Associates

- i. All employees and consultants must understand that an allegation of sexual harassment or gender discrimination is a grave violation that will be taken seriously and not tolerated.
- ii. In addition to the conduct standards in the Employee Code of Conduct v1.1, the following good practices must guide the actions and behaviour of all employees at all times in work-related settings:
 - Know and understand this Policy — POSH awareness is a professional responsibility, not optional
 - Be aware of one's own behaviour, particularly what may be perceived as inappropriate to a reasonable person, and avoid such behaviour
 - Be aware of cultural sensitivities — while cultural context is relevant, it never justifies harassment
 - Understand that a woman's or any person's manner of dress, appearance, or silence does not constitute consent — 'no' means no and the absence of 'no' is not 'yes'
 - Be alert and ready to help if a colleague appears to be in distress or seeking help
 - Understand that harassing any person is not a proof of strength or masculinity — it is an abuse of power
 - Say 'NO' clearly if asked to go to places, do things, or participate in situations that make you uncomfortable
 - Trust your instincts. Walk away from uncomfortable situations
 - Report and encourage reporting as a norm — not an exception
 - Refrain from trivialising harassment as a light-hearted joke or 'harmless' teasing
 - Maintain confidentiality regarding any aspect of an inquiry to which you or a colleague may be party
 - Refrain from making false complaints or misusing this Policy
 - Remember that an unwanted and abusive display of power can undermine the self-confidence of a person and make them feel angry and resentful

Section 17: Policy Implementation and Review

- i. This Policy will be implemented and reviewed by the Board of Directors of 17000 ft Foundation. The Board receives the IC's annual report summary and is responsible for ensuring that the Foundation meets its POSH Act obligations.
- ii. The IC is responsible for reviewing this Policy annually and recommending amendments to the Board where required by changes in law, regulatory guidance, or organisational circumstances.
- iii. This Policy may be amended from time to time to reflect changes in the POSH Act or its implementing rules, developments in case law, or the Foundation's evolving operational context. Material amendments require Board approval and will be communicated to all employees with at least 30 days' notice. All employees will be required to re-acknowledge a materially amended policy within 30 days of communication.
- iv. This Policy supplements employees' contracts of employment and the Employee Code of Conduct v1.1. It does not reduce any right conferred by the POSH Act, 2013 or any other applicable law.

Section 18: Acknowledgement

This acknowledgement must be signed by every employees, consultants, volunteers, interns, associates at all locations and returned to the Head – HR within 7 days of receipt. It must be renewed annually or when a revised version is issued.

Employee Declaration	
Full Name	
Designation	
Location	
Employee ID (if applicable)	
Date of Joining (if applicable)	
Date of Acknowledgement	
Version Acknowledged	Version 2.0 17000ft/POSH/2026-01 Effective 1 April 2026

I confirm that I have received, read, and understood the 17000 ft Foundation Policy on Prevention of Sexual Harassment at the Workplace (Version 2.0, effective 1 April 2026). I agree to comply with all provisions of this Policy. I understand that violations of this Policy are a grave matter that may result in disciplinary action up to and including termination of employment, and may also constitute a criminal offence under applicable law. I understand that I have the right to file a complaint with the IC at 17000ft.IC@17000ft.org and that I will not face retaliation for doing so in good faith.

Signature: _____

Witness (a 17000ft employee): _____

For 17000 ft Foundation:

Sandeep Sahu

Director, 17000 ft Foundation

*IC Contact: 17000ft.IC@17000ft.org | Presiding Officer: Radha Raj | www.17000ft.org
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