

Prevention of Sexual Harassment Policy

Version – 6.0

Revision History

Date	Version	Description	Prepared By	Reviewed By	Approved By
April 1, 2008	V 1.0	Launch of Sexual Harassment Policy	Sonal Akhaury	Ashish K. Srivastava	Ashish K. Srivastava
October 1, 2009	V 2.0	Review of the policy	Sonal Akhaury	Ashish K Srivastava	Ashish K Srivastava
May 1, 2014	V 3.0	Review of the Policy	Rohit Khurana	Manjit Lakhmana	Manjit Lakhmana
December, 2018	V 4.0	Review of the policy	Ketan Kanaujia	Parul Murthy	Kiran Yadav
October, 2024	V 5.0	Review of the policy	Kiran Dahiya	Ritu Arora	Kiran Yadav
January, 2026	V 6.0	Addition of clause 1.8 vi	Namrata Makan	Parul Murthy	Kiran Yadav

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Sexual Harassment Policy

1.1 Introduction

The Company believes in affording equal opportunity, free from any form of gender bias to all its employees. It is committed to creating and maintaining a safe and comfortable working environment which is free from sexual harassment and where all members of the staff are treated with dignity, courtesy and respect. Such provision of a safe and congenial work environment for all employees is an integral part of the organization employment policy.

Sexual harassment undermines the dignity of the victims and their colleagues at work. A workplace environment which is safe and free from hostility enables people to contribute more effectively to individual and organisational success to achieve higher levels of job satisfaction and performance.

The Company's goal herein is to develop and foster a culture in which sexual harassment is known to be unacceptable, and where individuals are confident to bring complaints, in a healthy manner with a productive outlook, without the fear of ridicule or reprisal.

This Policy confirms the specific and express commitment of the organization to promote a workplace free of sexual harassment for all its women employees. Sexual harassment of women at the workplace is unlawful and amounts to misconduct under the Sexual Harassment of Women at Workplace (Prevention, Prohibition & Redressal) Act, 2013 (hereinafter referred to as "ACT").

1.2 Responsibility

All employees of the Organization have a responsibility to prevent or deter the commission of acts of sexual harassment at the workplace (defined hereinbelow).

It is a duty of every employee of the Organization to personally be responsible to ensure that their behaviour is not contrary to this Policy.

It is the duty of each employee to ensure that the workplace is free from sexual harassment. It is also the duty of any aggrieved woman employee to complain against sexual harassment in a timely manner in accordance with the procedure provided herein and also preserve the confidentiality of all their communications in this regard at all times.

Managers and superiors have a further responsibility to promote awareness of this policy within their work area and also to confidentially report to the IC (at the earliest) any concerns of sexual harassment received by them (either verbally or in writing).

The Organization will respond promptly to complaints of sexual harassment made by any aggrieved woman employee in the manner provided for herein, through the Internal Complaints Committee constituted hereunder in accordance with the ACT (ref para 1.4 below).

The Organization assures that where an aggrieved woman employee has raised a complaint in a bona fide manner, in accordance with the procedure provided herein and preserved the confidentiality of the communication, the Organization shall safeguard the aggrieved woman employee, to the extent reasonably possible,, from any form of retaliation by the person she has complained against in accordance to the Act.

Where it is determined, that inappropriate conduct has occurred, prompt and appropriate corrective action will be taken, as necessary, including disciplinary action in accordance with the process laid down under this Policy.

The Organization will provide full support to the Internal Complaints Committee incase of legal action/claim due to actions taken by it including legal immunity, representation, costs etc and provide necessary facilities for dealing with the complaint and conducting its inquiry.

This Policy applies to all employees of the organization in India and is akin to service rules of the organization and are to be deemed as such for the purposes of the Act. For the purposes of this Policy, such employment can be of any nature, whether regular or temporary, full-time or part-time, adhoc or daily wage basis, and will also extend to trainees, probationers, apprentices, employees on contract, persons employed through contractors/agents, consultants or any other service provider and even persons working on a voluntary basis or without any form of remuneration.

The 'Workplace' includes:

- i. All offices and premises of the Organization where its business is conducted; and
- ii. Any place or premises visited by an employee in discharge of the duties towards the Organization, or where the employee is present in a work related context or in professional capacity, including training programmes, conferences, off-site meetings & events, work related functions, office parties, business or field trips organized by the Organization, and includes places visited when conducting the business of the Organization in interaction with clients, customers and other service providers and also including transportation provided by the Organization for undertaking such journey.
- iii. All modes of communication such as phone calls, email, messaging, whatsapp and any other social media on which work related communication of any form has taken place (at any point of time) or where the employees have, in the first instance, come to share or otherwise obtain their contact details/details for electronic or non-electronic communication on account of their being employees/colleagues in the Organization.

Under this Policy, complaints can be made by any aggrieved woman i.e., a woman of any age, whether employed or not with the Organization who alleges that she has been subjected to sexual harassment by the alleged perpetrator who is an employee of the Organization at the time the alleged incident of sexual harassment occurred, and/or where the alleged incident has taken place at the Workplace.

Where any alleged act of sexual harassment occurs as a result of an act by any person not an employee of the Organization, and where the aggrieved woman is an employee of the Organization, the Organization will take all steps necessary and reasonable to assist the aggrieved woman in terms of any additional support and preventive action, including, where requested in writing by such aggrieved woman, cause to initiate action against the alleged perpetrator under the Indian Penal Code or, where relevant, cause a representation to be made to the employer of the alleged perpetrator (where such person is not an employee of the Organization). Where any external proceedings require the presence or statement of the aggrieved woman or any witnesses who are employees of the Organization, the organization will make best efforts for her/their comfort and convenience in involvement in such proceedings either along with a representative of the organization or by exchange of communication/information in writing through the organization's IC's.

1.3 Definition

Sexual harassment in the workplace is to be read in accordance with Section 2(n) and Section 3(2) of the Act and covers all workplace interaction. It also includes any or more of the following unwelcome acts or behaviour (whether directly or by implication) namely:

- i. Any unwelcome physical contact – (for ex. unwanted touching of clothing, hair or body, leaning over, cornering, pinching, brushing up, molestation etc.)
- ii. Any physical advances – (It is made clear that the Organization only encourages professional conduct and professional relationships in the workplace at all times and any actions that are not professional, even where mutual between the individuals may not be welcome to the Organization particularly where a senior-subordinate relationship exists. In all such circumstances, voluntary and confidential disclosures should be made to HR at the first instance of such relationship being established and this remains the responsibility of the senior employee).
- iii. Making sexually coloured remarks or innuendos – (eg: turning work discussions to sexual topics, jokes, asking personal questions about sex life, asking about sexual fantasies, preferences or history, repeatedly asking a person out who is not interested etc.)
- iv. Showing of pornography – (eg: display of pictures, sexually suggestive and offensive e-mails, messages, what Sapp, cartoons, jokes and letters etc.)
- v. Any other unwelcome or unwanted physical, verbal, non-verbal conduct of sexual nature – (eg: any actions or conduct that are targeted on account of an individual's sex, sexual orientation, gender stereotypes or are discriminatory in nature on account of sex and/or gender)

What does not amount to sexual harassment

If the interactions between the individuals are consensual, welcome, appreciated and / or reciprocated, it does not amount to sexual harassment. However, it is clarified that consent needs to be expressly or positively established and will also need to be sought at all times and it should not be assumed, that if given once will thereafter apply for all spectrums of behaviour. In case consent is expressly withdrawn or objection made, any further behaviour will be treated as unwelcome even where such behaviour existed in the past. Any personal relationship which are based on mutual attraction is not sexual harassment, subject to the parties making the required disclosures to HR as stated at 1.3 (ii) above.

1.4 Internal Complaints Committee (Sexual Harassment Committee)

The organization hereby constitutes Internal Complaints Committees for all offices across country which will inquire and recommend redressal of any complaint of sexual harassment made by any aggrieved woman.

The Constitution of the Internal Complaints Committees is as follows:

- i. The 'Presiding Officer', shall be a senior woman employee in CL5 or above.
- ii. One member from amongst NGOs, or associations committed to the cause of women, or a competent Advocate, or other person familiar with issues relating to sexual harassment
- iii. A employee from Human Resources, CL 6 or above and/or A employee from Legal team, CL6 or above
- iv. One senior employee.

As a good practice, from every administrative unit there may be a First Contact Point (FCP) employee from respective location. FCP will be responsible to sensitize and inform the internal complaints committee immediately on receipt of the complaint.

It is ensured that the Internal Complaints Committee has a majority of women members and the Presiding Officer is a woman in accordance with the subject law. The Organization shall at all times, notify via the intranet / display of notices, names of the members who constitute the Internal Complaints Committees, along with their contact numbers, and e-mail addresses.

In the event of unavailability that the merits of a particular case require additional caution or consideration in the interest of a fair, objective and unbiased inquiry, the Organization reserves the right to appoint 'Special Members' in addition or as replacement to any or all of the members (except the External Member) appointed to the Committees as above depending on the facts and circumstances of the case.

1.5 The Complaint

- i. Under this Policy, any aggrieved woman who feels she is being sexually harassed can make a complaint in writing to the Internal Complaints Committee with a detailed record of the incident/s (such as dates, time, locations, what exactly happened and the response) while filing the complaint. A complaint can also be made by a legal heir on behalf of an aggrieved woman on account of her physical or mental incapacity or death or otherwise. In the event that a complaint of sexual harassment is received by any manager / supervisor or other employee of the company, the same shall be forwarded to the Internal Complaints Committee while preserving confidentiality of the communication.
- ii. The Complainant i.e. aggrieved woman should file a complaint as soon as possible, and latest within a period of three months from the date of the incident, and in case of a series of incidents, within a period of three months from the date of the last such incident.

1.6 Redressal mechanism

- i. Upon receipt of a complaint, whether in writing or otherwise, the Internal Complaints Committee will respond to or hold a meeting with the aggrieved woman within seven days.
- ii. If the aggrieved woman is not in a position to make a complaint in writing, the Presiding Officer, or any member of the Internal Complaints Committee, shall direct the aggrieved woman to a competent officer from Human Resources, nominated by the Organization to render reasonable assistance to her in making the complaint in writing.
- iii. If the aggrieved woman has made a request to hold inquiry, within ten days of receipt of such request, the Internal Complaints Committee shall inform the alleged perpetrator in writing that a complaint has been filed against him and seek his explanation. The Internal Complaints Committee in its intimation shall inform about the nature of allegations leveled against him by the aggrieved woman.
- iv. The alleged perpetrator will be given 5 working days to furnish his reply/explanation in connection with the allegations of sexual harassment leveled against him.

- v. The Internal Complaints Committee shall meet with the aggrieved woman and the alleged perpetrator separately.
- vi. The Internal Complaints Committee may, then, upon the request, or the consent of the aggrieved woman, prior to the initiation of any inquiry take steps to settle the matter between her and the person complained against through conciliation. However, no monetary settlement shall be made as a basis for arriving at any settlement.
- vii. If any settlement is arrived at between the parties during conciliation, the settlement shall be recorded in writing and the Internal Complaints Committee shall provide copies of the settlement as recorded, to both the parties.
- viii. If a settlement is arrived at through conciliation, no further inquiry shall be required to be conducted by the Internal Complaints Committee and the matter will be treated to be closed.
- ix. However, in case where no conciliation has been requested by the aggrieved woman, or no settlement has been arrived at between the parties and / or if the aggrieved woman informs the Internal Complaints Committee that any term or condition of the Settlement arrived at earlier has not been complied with, the Internal Complaints Committee shall proceed to make an Inquiry into the complaint.

1.7 The inquiry procedure

- i. The Internal Complaints Committee is free to decide on the procedure of inquiry in accordance with the facts and circumstances of each case. The following steps shall usually be taken by the Internal Complaints Committee and where divested or revised, may require written reasons for doing the same:
 - a. The Internal Complaints Committee shall first hear the aggrieved woman and record her statement. The aggrieved woman can also submit any documentary proof or any other corroborated material to substantiate her Complaint.
 - b. Thereafter, explanation will be sought from the alleged perpetrator and he will be provided copy of complaint/ statement of allegations for this purpose. Where necessary, he may be called for making his statement/ providing clarifications to explanation already given and also submitting evidence on his behalf, if he desires to do so.

- c. If the aggrieved woman or the alleged perpetrator desire any witness/es to be called, they shall communicate in writing to the Internal Complaints Committee the names of the witness/es they propose to call.
 - d. The Internal Complaints Committee if it deems fit and proper, may also summon the attendance of any person and examine the person on oath as well direct production of any document which may assist the Internal Complaints Committee in dealing with in the complaint.
- ii. The inquiry shall be conducted in English or the language the aggrieved woman is conversant with.
- iii. The inquiry may be conducted at any singular venue or multiple venues in person or through electronic means (videoconferencing, skype, telephonically) depending on the availability and comfort of the members, the parties and the witnesses and primarily with the consideration of maintaining confidentiality.
- iv. The inquiry proceedings shall be recorded in writing in English.
- v. The inquiry shall be conducted by the Internal Complaints Committee in accordance with the principles of natural justice. The inquiry proceedings shall be conducted in a fair, transparent and objective manner and both the parties will be given opportunity of being heard.
- vi. If either party remains absent during the Inquiry proceedings, the same may be conducted ex-parte on the basis of material on record.
- vii. The Inquiry Proceedings will be concluded within a period of ninety days from the date of the receipt of the request for inquiry by the IC.

1.8 Actions by internal complaints committee

- i. During the pendency of the Inquiry, the Aggrieved woman may, make a written request to the Internal Complaints Committee to seek a transfer for herself or the alleged perpetrator to any other workplace or grant her leave upto a period of three months.
- ii. The alleged perpetrator can also request in writing for a temporary re-assignment of work for himself for the period of the inquiry.

- iii. The Internal Complaints Committee may, after ascertaining the reasonableness and justifiability of the request, recommend to the organization to transfer the aggrieved woman or the alleged perpetrator to any other workplace or grant the aggrieved woman leave upto a period of three months.
- iv. On the basis of the recommendations of the Internal Complaints Committee if either the aggrieved woman or the alleged perpetrator is an employee of the Organization, the Organization shall transfer either party to any other workplace as it deems fit and proper. Neither the aggrieved woman nor the alleged perpetrator shall have any choice of place of transfer as it will be as per the organization's requirements.
- v. During the pendency of the Inquiry, if the Internal Complaints Committee is independently of the view that the presence of the alleged perpetrator at the workplace may be detrimental to the interest or to the conduct of a free and fair Inquiry, the Committee can recommend to the Organization to place the alleged perpetrator under suspension/leave pending completion of the Inquiry, provided that the person sought to be suspended/put on leave is a direct employee of the Organization. On receipt of such recommendation from the Committee, if the Employer decides to place the alleged perpetrator under suspension, he will be entitled to full wages during such period of suspension pending Inquiry. Such suspension order may also include an order prohibiting the alleged perpetrator from accessing any of the Organization's premises, hardware or software, online networks, systems, platforms, databases, e-mail, data, employees, vendors or customers. However, supervised access will be provided to information relevant to him preparing his defense.
- vi. Any resignation submitted by a party to an inquiry during its pendency shall, in the ordinary course, not be accepted until the inquiry is concluded. Managers and supervisors shall not accept or process any such resignation without informing Human Resources, which shall place the matter before the Internal Committee ("IC"). In exceptional circumstances, the IC may, at its discretion, permit acceptance of resignation in a manner that does not prejudice the inquiry. Reasons in writing shall be maintained on record. Notwithstanding the aforesaid, acceptance of resignation, if permitted, shall not bar continuation or conclusion of the inquiry or recording of findings in accordance with law.

1.9 The inquiry report and the action on the inquiry report

- i. On completion of the Inquiry, the Internal Complaints Committee shall submit the report of its findings to Organization along with all relevant documents, statements, and any other material evidence, within ten days from the date of closure of the Inquiry proceedings.

- ii. Where both parties are employees of the organization, a copy of the report shall also be made available to the aggrieved woman & the alleged perpetrator for them to provide any objections they may have on the findings within a provided period including any requests for cross-examination and/or examination of further evidence. If objections are received within the time frame provided, the same shall be addressed first by the Internal Complaints Committee by way of an addendum to the report and such report in its entirety will be the final report.
- iii. On the basis of the final report submitted by the Internal Complaints Committee and the recommendations therein, the Organization shall take appropriate action against the alleged perpetrator. If the allegations against the alleged perpetrator have not been proved, the Organization shall take no action in the matter.
- iv. If the allegations against the alleged perpetrator have been proved as per the report of the Internal Complaints Committee, the Organization will treat it as misconduct by the employee and will take action on the basis of recommendations of the Internal Complaints Committee. The

Internal Complaints Committee may recommend any action in order to prevent, deter, prohibit or redress sexual harassment in the workplace (in proportion to the findings and depending on the facts and circumstances of each case) including but not limited to counseling, retraining, observation, submission of apology / undertakings, warning (verbal or written), no-contact bonds, transfer, demotion, suspension (with pay or without), docking of pay or other benefits, separation or termination. Where the criminal action is necessary, the same may be recommended with the consent of the aggrieved woman.

- v. Proceedings conducted under the provisions of this Policy, shall be construed as disciplinary proceedings / inquiry proceedings under the Disciplinary Action Policy and any action recommended by the Internal Complaints Committee would be deemed to be disciplinary action under the Disciplinary Action Policy. No separate inquiries shall be required under the Disciplinary Action Policy for the purpose of arriving at the disciplinary action. Where required, the Organization may additionally take appropriate disciplinary action for misconduct in accordance with the provisions of the Disciplinary Action Policy.

- vi. The Organization may also, on the basis of recommendations of the IC, deduct from the salary or wages any sum as prescribed by the Internal Complaints Committee to be appropriate, to be paid to the aggrieved woman. The quantum of the sum to be deducted will be determined by the Internal Complaints Committee, which, in arriving at such quantum shall have regard to (i) the mental trauma, pain and suffering of the aggrieved woman, (ii) the loss in career opportunity, (iii) the medical expenses incurred due to sexual harassment, whether for physical or psychiatric treatment and (iv) the income and financial status of the perpetrator. The Organization may deduct the sum of money either in lump sum or in installments from the salary of the perpetrator, based on recommendations of the IC.
- vii. If the Organization is unable to deduct any sum from the perpetrator, it may direct him, in writing, to make the payment directly to the aggrieved woman within a period of thirty days from the date of this direction from the Organization to the perpetrator. The perpetrator will be instructed to intimate the Organization within three days of making such payment to the aggrieved woman. In the event that the said thirty days elapse, without the payment having been made by the perpetrator to the aggrieved woman in the manner prescribed, the Organization shall inform the IC which shall, within a further period of 15 days forward the order for recovery of the sum as an arrear of land revenue to the concerned District Officer.
- viii. The organization will act upon the recommendations of the Internal Complaints Committee within sixty days of receiving the Inquiry Report.
- ix. Notwithstanding anything to the contrary, in the event of any conflict between the disciplinary action policy and this policy concerning sexual harassment in the workplace, the provisions of this policy shall prevail in cases concerning sexual harassment in the workplace.

1.10 False and malicious complaint and fake evidence

- i. This Policy has been put in place to ensure redressal of complaints against sexual harassment. It is understood that a complainant's mere inability to substantiate a complaint, or provide adequate proof, will not automatically cause her complaint to be perceived in the wrong light. However, where the Internal Complaints Committee arrives at the conclusion that the allegation made against the alleged perpetrator is malicious or has been made by the aggrieved woman with the knowledge that it is false, or if she or any person making the complaint or any witness has produced any false or misleading document or given false evidence, it may recommend that the matter be inquired into and action be taken in accordance with the procedure and provisions laid down in the Disciplinary Action Policy if the aggrieved woman, the complainant or the witness, as the case may be, is a direct employee of the Organization and in other cases, as the Organization deems fit and proper.
- ii. The Organization may also take appropriate action against any witness in accordance with the procedure and provisions laid down in its Disciplinary Action Policy, who may have testified and where the Internal Complaints Committee has arrived at a conclusion that such witness has given false evidence or produced any forged or misleading documents.
- iii. A mere inability to substantiate a complaint, or provide adequate proof, will not be considered to be a false/malicious complaint.

1.11 Confidentiality

Once a complaint in writing has been received by the Internal Complaints Committee it will be kept in strict confidence. Throughout the process of Inquiry Proceedings confidentiality will be maintained to the extent practicable and possible under the circumstances. No details of the identity of the aggrieved woman, details of the complaint, Inquiry Proceedings and findings/recommendations shall be released to any public, press or media.

It is the duty of all the parties concerned i.e. the aggrieved woman, alleged perpetrator and/ or any of the witnesses to maintain utmost secrecy and confidentiality in respect of the identity of the aggrieved woman, details of the complaint, Inquiry Proceedings and findings/ recommendations and action taken by the Organization. No details shall be released by any of the employees to any public press or media and in case of breach of this confidentiality clause, the Organization shall take appropriate action under the provisions of its Disciplinary Action Policy.

Information without particulars, specifically with regard to the identity of the parties involved, may be used by the Organization where required for authorised purpose.

1.12 Immunity

Irrespective of the findings and recommendations of the Internal Complaints Committee and the action of the Organization, the aggrieved woman, the alleged perpetrator and / or any of the witnesses/ persons providing information will not be victimised for anything said or done in connection with the sexual harassment complaint made. The Organization shall make best efforts to protect from any form of retaliation, if any.

Any form of unwarranted pressures, retaliation, victimisation or any other type of unethical behaviour by the alleged perpetrator against the aggrieved woman and / or witnesses shall be reported immediately by them to the Internal Complaints Committee. In case of genuine complaints the Internal Complaints Committee may recommend to the Organization, to take appropriate disciplinary action.

1.13 Effective Date

1st January 2026

Glossary of Terms & Abbreviations

Aggrieved Women	Female personnel who has filed a complaint
Alleged Perpetrator	Personnel against whom the complaint is filed
IC	Internal Complaints Committee