

Prevention of Sexual Harassment Policy



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1. Commitment

Servion Global Solutions Private Limited (“**Servion**”, “**Company**”) is committed to guaranteeing a safe working environment for all Constituents (as defined hereinafter) thereby ensuring harmonious relations based on mutual trust and respect between all employees of the Company. Servion is also committed to providing a safe and welcoming environment to all those who visit Servion in any capacity such as customers, vendors etc. Towards this end, Servion has developed governance structures, practices and procedures that ensure that ethical conduct is promoted across all levels of the organization.

2. Purpose

The **Prevention Of Sexual Harassment** policy at workplace (“Policy” / “POSH Policy”) framed by the Company is gender neutral; however in particular any matter which has not been specifically covered or discussed under this Policy as applicable to complaints of sexual harassment by an ‘aggrieved woman’ (as defined hereinafter) will be dealt with in the manner prescribed under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and rules framed thereunder (“**Act**”).

3. Scope

This Policy is applicable to Servion India and covers all individuals (“**Constituents**”) as described below:

- a) Board members, management staff and permanent employees in all grades across Servion India.
- b) Consultants, advisors, retainers engaged with Servion in any capacity.

All categories of employees at Servion India whether hired on full-time, part-time, or casual, temporary, or permanent or ad hoc or daily wage basis; job candidates; student placements, apprentices, contractor staff, sub-contractors, trainees, and volunteers either directly engaged or through an agent or contractor, with or without remuneration, on a voluntary or other basis.

“Workplace” for the purposes of this Policy includes all offices and off-sites of Servion and places visited by the Constituents where services are rendered or arising out of or during employment/ engagement/ assignments including transportation provided by Servion to undertake such a journey. Workplace would include the place of residence/any other place the Constituent chooses to work from remotely for any reason whatsoever.

4. Definition of Sexual Harassment

“Sexual Harassment” includes any unwelcome sexually determined behaviour (direct or implied) such as physical contact and advances, unwelcome communications or invitations, demand or request for sexual favours, display of pictures, signs, sexually coloured remarks, showing pornography, creating a hostile work environment and any other unwelcome “sexually determined behaviour” (physical, verbal, or non-verbal conduct) of a sexual nature (**“Sexual Harassment”**).

Note: Sexually coloured remarks, while not defined in the Act, may include any unwelcome remark / comment / inappropriate, remark / joke / insinuation about a person’s dress, physique, age, marital status, planning a family, etc. Further, any unwelcome invitation or request, implicit or explicit, any lascivious look, lurid stares or other gestures associated with sexuality; and any unnecessary physical contact such as touching, caresses, pinching, molestation, or assault may also amount to Sexual Harassment under this Policy.

Other examples of Sexual Harassment may include verbal or written harassment through loaded comments, remarks or jokes, letters, offensive remarks, phone calls or e-mails, messages, threats, gossip, intrusion, spying, stalking, sounds or display of a derogatory nature, which have the purpose or effect of interfering with an individual’s performance or of creating an intimidating, hostile or offensive work environment.

Where the Complainant (as defined hereinafter) is not directly subjected to any of the above acts, but has been a subject of sexually coloured remarks, jokes, comments, made by co-workers and the Complainant is aware of such comments, such acts may also be considered as Sexual Harassment under this Policy.

Further, the following circumstances among others, if it occurs or is in relation to or connected with any act or behaviour of Sexual Harassment, may also amount to Sexual Harassment:

- a) Implied or explicit promise of preferential treatment in employment.
- b) Implied or explicit threat of detrimental treatment in employment.
- c) Implied or explicit threat about present or future employment status.
- d) Interference with work or creating an intimidating or offensive or hostile work environment; or
- e) Humiliating treatment likely to affect health and safety.

Sexual Harassment may take any one of the forms described below: -

4.1 Verbal

Other examples of Sexual Harassment may include verbal or written harassment through loaded comments, remarks or jokes, letters, offensive remarks, phone calls or e-mails, messages, threats, gossip, intrusion, spying, stalking, sounds or display of a derogatory nature, which have the purpose or effect of interfering with an individual's performance or of creating an intimidating, hostile or offensive work environment.

Verbal sexual harassment comprises use of profanity, obscene or degrading terms and inappropriate use of terms of endearment. It can also include obscene jokes, catcalls or approaches with sexual overtones. Spreading rumors about an individual's sex life or sexually oriented remarks about a person's clothing or body can be termed as Sexual Harassment.

4.2 Non - Verbal

The scope of non-verbal Sexual Harassment is very wide; gestures made with intentional sexual overtones, staring, leering, blowing kisses, licking lips can fall under the purview of non-verbal Sexual Harassment. Leaving sexually suggestive notes, magazines, cartoons, mugs, or pictures can also be considered as an act of Sexual Harassment.

4.3 Quid Pro Quo Sexual Harassment

Quid pro quo means something in return or an exchange of one thing for another. In the Workplace, quid pro quo Sexual Harassment takes place if sexual favors are asked in exchange for any kind of special treatment on the job. Threatening a Constituent if he/ she/ they do not consent to such sexual advances or favors also amounts to Sexual

Harassment. The act of 'asking' may either be verbal or implied and the 'sexual conduct' may be verbal or physical, but, in either case, it must be unwelcome.

For e.g., Direct, or implied requests or offers by any Constituent for sexual favors in exchange for actual or promised job benefits such as favorable reviews, salary increases, promotions, increased benefits, or continued employment - constitutes sexual harassment.

4.4 Hostile Work Environment

Hostile environment Sexual Harassment occurs when either speech or conduct of a sexual nature takes place and is seen or perceived as offensive and interferes with the work performance of the recipient, or any one or more Constituents. Hostile environment Sexual Harassment may also include intimidating or harassing conduct that is directed at an individual, or a group of individuals.

It will also mean related retaliation which includes marginalizing someone in the Workplace regarding his / her/ their roles and responsibilities, socially ostracizing, intimidating someone physically, psychologically, and emotionally or someone close to or related to the victim

The above is only an indicative list of the possible acts which could be treated as Sexual Harassment and is in no way intended to be construed as an exhaustive list.

In the event of an occurrence of any instance of sexual harassment with respect to a Constituent as a result of an act by a third party or an outsider during the course of employment or rendering of service, Servion will take all necessary and reasonable steps to assist such affected Constituent in terms of support and preventive action, including, but not limited to providing assistance to the Constituent, if he/she/they so wishes to file a complaint under the Indian Penal Code, 1860.

In the event of an occurrence of any instance of sexual harassment with respect to a third party or an outsider who is a woman ("**Aggrieved Woman**") because of an act by a Constituent during employment or rendering of service, Servion will take all necessary and reasonable steps to redress such complaints including providing assistance to the Aggrieved Woman as required under the Act and this Policy.

For the purposes of the Policy, the term “**Complainant**” means any Constituent of any gender or age or any Aggrieved Woman who alleges to have been subject to any act of Sexual Harassment by the respondent being a person against whom an aggrieved Constituent or Constituent who believes that there has been a violation of this Policy makes a complaint (“**Respondent**”).

5. Preventive Action

The Company will take reasonable steps to ensure prevention of Sexual Harassment at the Workplace such as:

- Circulating applicable policies and other relevant information to all Constituents.
- Including details of this Policy as part of Company induction process for new joiners.
- Conducting yearly awareness campaigns that reiterate the importance of the Policy and sensitize Constituents of key policy provisions.
- Training and skill building sessions for members of the ICC (as defined hereinafter) members.

6. Internal Complaints Committee (ICC)

The Company has constituted an internal complaints committee (“**ICC**” / “**Committee**”) for redressal of Sexual Harassment complaints (made by the Complainant or by any of the prescribed persons) and for ensuring time bound treatment of such complaints.

In accordance with the Act, the ICC of the Company comprises of the following:

- Chairperson – A woman employed at a senior level (“**Chairperson**” / “**Chairman**”).
- 2 (two) members- employees preferably committed to the cause of woman or have had experience in social work or have legal knowledge.

The following persons of the ICC shall be removed from the ICC if:

- a) He / she / they make / makes known to the public, press or media by means of publishing, communicating or in any other manner, any information in relation to the contents of a complaint, the identity and addresses of the Complainant, Respondent and witnesses, details of the conciliation and inquiry proceedings, recommendations of the ICC, or the action taken by Servion. Such non-disclosure obligation shall not apply to information regarding the justice secured to any Complainant. However, care should be taken that the name, address, identity, or

any other particulars that could lead to the identification of the Complainant or witnesses should not be disclosed; or

- b) He /she / they have / has been convicted for an offence or an inquiry into an offence under any law for the time being in force or is pending against him/her/them including any proceedings under the Act; or
- c) He / she / they have/has been found guilty in any disciplinary proceedings or a disciplinary proceeding is pending against him / her / them including any proceedings under the Act; or
- d) He / she / they have / has so abused his / her / their position as to render his/her/their continuance in office prejudicial to the public interest.

One member- amongst non-governmental organizations or associations committed to cause of woman or a person familiar with the issues relating to Sexual Harassment. The Committee shall be responsible for investigating any violations to this Policy and recommending appropriate action. The ICC will have a minimum of 5 (five) members (including the chairperson) and will necessarily have at least 50% female representatives and shall comprise the following:

- a) The chairperson of the ICC, who shall be a woman employed at a senior level from amongst the Servion.
- b) Not less than 2 (two) members of the Committee shall preferably be Servion committed to the cause of women or who have had experience of social work or have legal knowledge.
- c) 1 (one) member from a non-governmental organization or association committed to the cause of women or a person familiar with the issues relating to sexual harassment.

The ICC shall also co-opt local members from the other offices. In addition, the ICC shall also induct a secretary who shall be responsible to transcribe the proceedings of the meetings of the ICC with the complainant, respondent, witnesses and concerned parties during the conciliation/inquiry process.

On receipt of the complaint, the Committee shall evaluate if any of the members of the Committee are involved in or closely connected with the complaint to result in a conflict of interest with that of the parties involved. In the event of a conflict of interest, such member so conflicted shall not participate in the proceedings for the investigation into the relevant complaint and the Committee may co-opt other members to conduct the investigation for such complaint.

7. Responsibilities of ICC

- a) Inquiry, investigation, and redressal of complaints relating to Sexual Harassment in a fair and expeditious manner.
- b) Recommend appropriate psychological, emotional and any other necessary support (counselling, security, and other assistance) for the Complainant.
- c) Document minutes of meetings and discussions held by the Committee with the Complainant, respondent, witnesses, etc. during the redressal proceedings.
- d) Ensure strict confidentiality of the contents of the Complaint, identity of persons involved and of the redressal proceedings. Such responsibility of confidentiality shall also vest with the secretary inducted by the Committee to transcribe minutes of the proceedings.
- e) Ensure protection of the Complainant against discrimination / victimization / retaliation and recommend appropriate action in case of occurrence thereof; and
- f) Preparing the annual report at the end of the calendar year and submission of such report to the HR Department ("HR") and to the district officer as required under the Act.

8. Registering a Complaint

Constituents are encouraged to report any incident that they believe violates this Policy regardless of the offender's identity or position and without fear of reprisal.

When an incident of Sexual Harassment occurs at the Workplace, the victim of such conduct may, if he / she / they choose, communicate her / his / their disapproval and objections immediately to the harasser and request the harasser to behave decently. If the harassment does not stop or if the victim is not comfortable with addressing the

harasser directly, the victim can bring her /his / their concern to the attention of the ICC for redressal of her / his/ their grievances.

A complaint can be raised through any of the following channels

- a) Email the complaint to posh@servion.com (or any email meant for the purpose)
- b) Email the complaint to ICC Chairperson or any member of the ICC.
- c) Register the complaint on [Home | SHe-Box | MINISTRY OF WOMEN & CHILD DEVELOPMENT | GOI](#)

The complaint should preferably be raised within 24 (twenty-four) hours but not later than 6 months from the date of incident / date of last incident in case of a series of incidents. The Complainant shall file the complaint in writing ("**Complaint**"). and is required to disclose the name, department, division, and location of working, to enable the Chairperson to contact and take the matter forward.

The ICC for the reasons to be recorded in writing may extend the time limit not exceeding 3 (three) months, if it is satisfied that the circumstances were such which prevented the Complainant from filing a Complaint within the said period of 3 (three) months. The Complainant can provide any supporting document, names, and contacts of witnesses along with the Complaint. If the Complaint cannot be made in writing, the Chairman or any member of the Committee shall render all reasonable help to the victim for making the Complaint in writing. The Complainant shall peruse the same and shall for the purposes of authentication of the record, sign the recorded statement / complaint and / or Servion shall send the same by email in a situation wherein it is not possible to put signature by hand on the recorded statement / complaint. It is expressly clarified that at the earliest possible instance, the Complainant or the person filing the complaint on behalf of the Complainant as mentioned shall sign the recorded statement / Complaint.

In case of physical incapacity of the victim to file a Complaint, a complaint may be filed by:

- a) A relative or friend of the victim; or
- b) A co-worker; or
- c) An officer of the National Commission for Women or State Women's Commission; or
- d) Any person who has knowledge of the incident, with the written consent of the victim.

In case of mental incapacity of the victim to file a Complaint, a Complaint may be filed

- a) A relative or friend of the victim; or
- b) A special educator; or
- c) A qualified psychiatrist or psychologist; or
- d) The guardian or authority under whose care the victim is receiving treatment or care;
- e) Any person who has knowledge of the incident jointly with victim's relative or friend or a special educator or a qualified psychiatrist or psychologist, or guardian or authority under whose care the victim is receiving treatment or care.

In case the victim is unable to make a Complaint for any reason other than physical or mental incapacity, a complaint may be filed by any person who has knowledge of the incident, with the consent of the victim recorded in writing.

In case of death of the victim, a Complaint may be filed by any person who has knowledge of the incident, with the consent in writing of victim's legal heir.

At the time of filing of the Complaint, the Complainant is required to submit the Complaint along with supporting documents and names and addresses of the witnesses to the Committee.

On receipt of the Complaint, the Committee shall send 1 (one) of the copies received to the Respondent within a period of 7 (seven) working days.

The Respondent is required to file his / her / their reply to the complaint along with his / her / their list of documents, and names and addresses of witnesses, within a period not exceeding 10 (ten) working days from the date of the receipt of the documents.

Upon receipt of the Complaint, the Committee will inform the Complainant of the process of the redressal before initiating an inquiry and at the request of the Complainant take steps to settle the matter between the Complainant and the Respondent through conciliation. However, no monetary settlement shall be made as a basis of conciliation.

9. Redressal Process

The Committee will maintain a register to endorse the Complaint received by it and keep the contents confidential, except to use the same for discreet investigation. On receipt of the formal Complaint the ICC will begin the redressal process, the details of which are elaborated below.

9.1 Conciliation Process

The Committee at the request of the Complainant may take steps to settle the matter between the Complainant of Sexual Harassment and the Respondent through conciliation before an enquiry is conducted. In case settlement has been arrived at, the Committee shall record the settlement so arrived and forward the same to the Company management to act as specified in the recommendation. No monetary settlement shall be made as a basis of conciliation. The copies of the settlement arrived at shall be provided to the Complainant and the Respondent.

Where a settlement is arrived at, no further inquiry shall be conducted by the ICC. However, in case, the Complainant informs that any term or condition of the settlement arrived at has not been complied with by the Respondent, the Committee shall proceed to make an Inquiry (as defined hereinafter) into the Complaint.

9.2 Inquiry Procedure

The following is the procedure for an inquiry under the POSH Policy (“**Inquiry**”):

The Committee shall send 1 (one) of the copy of the Complaint received from the Complainant to the Respondent within a period of 7 (seven) working days of receipt of the same.

The Respondent shall file his / her / their reply to the Complaint along with supporting documents and the names and addresses of the witnesses, within a period not exceeding

10 (ten) working days from the date of receipt of the Complaint document. The Complainant shall be provided with a copy of the written explanation submitted by the Respondent.

In conducting the inquiry, a minimum of 3 (three) members of the Committee including the Chairperson shall be present. In relation to conducting of inquiry, the Committee have the same powers as are vested in a civil court under the Code of Civil Procedure, 1908(5 of 1908) when trying a suit in respect of the following matters, namely summoning, and enforcing the attendance of any person and examining her / him / them on oath; and requiring the discovery and production of documents.

The Committee shall make inquiry into the Complaint in accordance with the principles of natural justice. The parties shall not be allowed to bring in any legal practitioner to represent them in their case at any stage of the proceedings before the ICC. The Committee shall call upon all witnesses mentioned by both the parties. The Committee shall provide every reasonable opportunity to the Complainant and Respondent for putting forward and defending their respective case.

The Committee will have the right to terminate the inquiry proceedings or to give an ex-parte decision on the Complaint, if the Complainant or Respondent fails, without sufficient cause, to present herself or himself or themselves for 3 (three) consecutive hearings convened by the Chairperson, provided that such termination or ex-parte order may not be passed without giving a 15 (fifteen) days advance notice in writing to the party concerned.

The Committee shall conduct the inquiry in a timely manner but not beyond 3 (three) months of initiation of the Inquiry. The Committee shall submit a written report containing the findings and recommendations to the Company management as soon as practically possible and in any case, not later than 10 (ten) days from the date of completion of inquiry. The Company management shall act upon the recommendation within 60 (sixty) days of its receipt. The ICC report will also be made available to concerned parties.

10. Relief to Complainant Pending Enquiry

The Committee at the written request of the Complainant may recommend the Company management to,

- a) Restrain the Respondent from reporting on the work performance of the Complainant or conduct appraisals.
- b) Grant leave to the Complainant up to a period of 3 (three) months (such leave shall be in addition to the leave entitled as per the leave policy of Servion).
- c) Assign the Respondent to another office or team during the Inquiry or may ask the Respondent to proceed on leave till the inquiry is pending.

11. Penalties against Respondent

In case the Committee arrives at the conclusion that the allegation(s) against the Respondent have been proved, it shall recommend to the Company management to act for Sexual Harassment as a misconduct in accordance with the service rules applicable to the Respondent.

Based on the severity of the incident, the Committee can recommend any / combination of the following actions:

- a) Written apology.
- b) Warning.
- c) Reprimand or censure.
- d) Withholding of promotion.
- e) Withholding of pay rise or increments; or
- f) Terminating the Respondent from service.
- g) Deduction / payment of such compensation as it may consider appropriate to be paid to the Complainant or to his / her / their legal heirs.
- h) undergoing a counselling session.
- i) carrying out of community service; or
- j) any other action that the Committee may deem fit.

For determination of compensation, if any, the Committee shall consider the mental trauma, pain, suffering, and emotional distress caused to the Complainant, the loss in the career opportunity due to the incident of sexual harassment, medical expenses incurred by the Complainant for physical or psychiatric treatment, the income and financial status of the respondent and feasibility of such payment in lump sum or in instalments.

In case the Committee arrives at the conclusion that the allegation against the Respondent has not been proved, it shall recommend to the Company management that no action is required to be taken in the matter.

12. Penalties for Malicious Complaints

Where the ICC arrives at a conclusion that the allegation against the Respondent is malicious or the Complainant has made the complaint knowing it to be false or the Complainant has produced any forged or misleading document, it may recommend to the Company management to take disciplinary action in accordance with the provisions of the Company rules, policies, and procedures applicable to her or him or them.

13. Authorizing and Implementing Penalties

The head HR will be responsible for authorizing and implementing the actions recommended by the Committee.

14. Confidentiality

Servion understands that it is difficult for the Constituent to come forward with a complaint of Sexual Harassment and recognizes the Complainant's interest in keeping the matter confidential. To protect the interests of the Complainant, the Respondent and others who may report incidents of Sexual Harassment, confidentiality will be maintained by all the concerned persons including the member Chairman and member of the Committee, throughout any Inquiry process to the extent practicable and appropriate under the circumstances.

The meetings or investigations of the Committee may be held outside the premises of Servion or through audio-video conference.

Any person who is entrusted with the duty to handle or deal with the Complaint, Inquiry or recommendations or action under this Policy and contravenes the provisions of confidentiality will be liable to pay a fine of INR 5,000 (Rupees Five Thousand) to Servion in addition to other penalties which may be recommended by the Committee.

15. Annual Report

The ICC is required to prepare an annual report with the below-mentioned details and submit the same to the Board.

- Number of complaints received during the year
- Number of complaints disposed of during the year

- Number of cases pending for more than ninety days
- Number of workshops / awareness sessions conducted during the year
- Nature of action taken by the management in each of the complaints

16. Appeals

In case the Complainant or the respondent is aggrieved from the decision of the Committee or in case of non-implementation of the recommendation of the Committee, such aggrieved person may prefer an appeal within 75 (seventy-five) days from the date of receipt of the decision of the Committee or to the appellate authority notified under Section 2(a) of the Industrial Employment (Standing Orders) Act, 1946 within 90 (ninety) days from the date of receipt of decision of the Committee.

17. Amendment and Contact

In case of any clarifications regarding this document, kindly contact the HR Business partner. Any amendments to the Policy will be suitably communicated to the Constituents.

18. Responsibility Matrix

I have understood the code of conduct and agree to abide by the requirements that are listed in this document. I understand the importance of adhering to the code of conduct and that violation(s) of the same shall attract disciplinary actions as per the HR policy of the organization.

Activity	Responsibility
Communication / User Awareness Sessions	BPHR of location
Annual Report	General Counsel and / or Company Secretary
Addressing complaints / Enquiry initiation & closure	Chairperson - ICC
Maintaining Records of Enquiry Conducted	Chairperson - ICC
Authorizing & implementing penalties	HR Head

Document Version History

Document Ownership

Version No	Prepared by	Reviewed by	Approved by	Date Approved
1.1	Divya Sathyan	Subhashini M	Latha Nambisan	01-Jul-15
1.2	Krithika Vidyasagar	Subhashini M	Roshini Bakshi	01-Aug-17
1.3	Bhagban Patro	Subhashini M	Prakash Arunachalam	28-Jun-21
1.4	Kannan Narayan	Josephraaj	Josephraaj	13-Apr-21
1.5	Kannan Narayan	Josephraaj	Josephraaj	08-Dec-22

Revision History

Version No	Version Date	Change Description	Change Author
1.1	01-Jul-15	Initial Release	Divya Sathyan
1.2	01-Aug-17	Revised Policy	Krithika Vidyasagar
1.3	28-Jun-21	CRC members updated	Bhagban Patro
1.31	01-Apr-22	Updated the comments provided external legal counsel team	Sainathan K
1.4	13-Apr-22	Baseline Created	Kannan Narayan
1.5	08-Dec-22	POSH Members Updated	Kannan Narayan
1.6	14-Nov-25	ICC Committee Updated, Operative Clause Updated and She-Box as a mode of complaint registration.	Anupama Krishnan
1.7	20-Jan-26	Updated to new template	Anupama Krishnan