

POLICY ON PREVENTION OF SEXUAL HARASSMENT

1. VISION

ISSPL Limited (formerly known as IRCLASS Systems and Solution Limited and IRCLASS Systems and Solutions Pvt. Ltd) (ISSPL), is an equal employment opportunity organization and is committed to creating a healthy working environment that enables employees to work without fear of prejudice, gender bias and sexual harassment.

The organization also believes that all employees have the right to be treated with dignity. Sexual harassment at the workplace or other than workplace if involving employees is a grave offence.

2. DEFINITIONS

- a) **Act:** Act means The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013.
- b) **Aggrieved Person:** Aggrieved Person means a person, of any age whether employed or not, who alleges to have been subjected to any act of Sexual harassment by the Respondent.
- c) **Complainant:** Complainant is the person who lodges a complaint.
- d) **Employee:** Employee means a person employed at ISSPL, for any work on regular, temporary, ad-hoc or daily wage basis, either directly or through an agent, including a contractor, with or without the knowledge of the principal employer, whether for remuneration or not, or working on a voluntary basis or otherwise, whether the terms of employment are express or implied and includes a co-worker, a contract worker, probationer, trainee, apprentice or by any other such name.
- e) **Respondent:** A person against whom a complaint of Sexual harassment has been made by the Aggrieved Person.
- f) **Rules:** means the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Rules, 2013
- g) **Sexual Harassment:** Sexual Harassment includes any one or more of the following unwelcome acts or behaviour (whether directly or by implication):
 - i. Physical contact and advances; or
 - ii. Demand or request for sexual favours; or
 - iii. Making Sexually coloured remarks or remarks of a sexual nature about a person's clothing or body; or
 - iv. Showing pornography, making or posting sexual pranks, sexual teasing, sexual jokes, sexually demeaning or offensive pictures, cartoons or other materials through email, SMS, MMS, WhatsApp or any other mode or digital communication, etc.; or
 - v. Repeatedly asking to socialize during off-duty hours or continued expressions of sexual interest against a person's wishes; or
 - vi. Giving gifts or leaving objects that are sexually suggestive; or
 - vii. Eve teasing, innuendos and taunts, physical confinement against one's will or any such act likely to intrude upon one's privacy; or
 - viii. Persistent watching, following, contacting of a person; or

- ix. Physical and/or verbal or non-verbal or conduct, such as loaded comments, remarks or jokes, letters, phone calls, text messages or emails, gestures; or
- x. When any person uses with a sexual purpose, the body or any part of it or any object as extension of body in relation to another person without his/her consent or against his/her will, such conduct shall amount to sexual assault; or
- xi. Spreading rumours about an employee's sexual relationship; or
- xii. Abetment to any or all of the above;
- xiii. Any other unwelcome physical, verbal or non-verbal conduct of sexual nature

The following circumstances, among others, if it occurs or is present in relation to or connected with any act or behaviour of Sexual harassment, may amount to Sexual harassment:

- i. Implied or explicit promise of preferential treatment in employment; or
- ii. Implied or explicit threat of detrimental treatment in employment; or
- iii. Implied or explicit threat about present or future employment status; or
- iv. Interference with work or creating an intimidating or offensive or hostile work environment; or
- v. Humiliating treatment likely to affect health or safety.

h) Workplace: In addition to the place of work [Head office / Branch offices] it shall also include any place where the Aggrieved Person or the Respondent visits in connection with his/her work, during the course of and/or arising out of employment/ contract/ engagement with ISSPL, including transportation provided by ISSPL for undertaking such a journey.

Any term or abbreviation not expressly defined or explained under this Policy shall have the same meaning as is ascribed to it under the Act and in absence of such definition under the Act as well, such meaning may be derived from the General Clauses Act, 1977.

3. SCOPE

This Policy extends to all employees of ISSPL and of its subsidiaries and is deemed to be incorporated in the service conditions of all employees and comes into effect immediately. It shall also cover any action defined as Sexual Harassment, occurring outside of Workplace but having nexus to the Workplace. It shall also cover a person not being an Employee, subjected to an act of Sexual Harassment, at the Workplace.

4. INTERNAL COMPLAINTS COMMITTEE

As per the Act, Complaint Redressal Committees (Internal Complaints Committee-ICC) have been constituted. The composition of the committees is attached as an Annexure.

The Internal Complaints Committee or ICC shall *inter alia*:

- a. Assist the Aggrieved Person in filing the written Complaint, should such a requirement arise;
- b. Hold a meeting with the Complainant within 7 days of the receipt of the complaint;
- c. Conduct investigation in the matter of any complaints received;
- d. Maintain proper records of all the complaints received and the manner of investigation, including statements, evidence and minutes of the meetings of the Committee for investigation;
- e. Ensure that victims or witnesses are not victimised or discriminated against while dealing with complaints of sexual harassment;
- f. Submit report of its investigation to the management and convey it to the Board at the next meeting;

- g. Maintain and ensure maintenance of confidentiality of the names of the parties involved, including witnesses, contents of the complaint, any information relating to the enquiry, settlement, order etc;
- h. In case of a false or vindictive complaints, recommend action against such complainant;
- i. Provide assistance to the complainant to lodge a complaint with the authorities under the Bharatiya Nyaya Sanhita (BNS), if the degree of the offence is covered under BNS and the Complainant intends to lodge such complaint.

5. PROCEDURE FOR HANDLING COMPLAINTS:

Any employee who feels and is being sexually harassed directly or indirectly may submit a written complaint of the alleged incident to any member of the Committee in writing with his/her signature within a period three months or such other period as the Act or the Rules may prescribe, from the date of the incident and in case of a series of incidents, within a period of three months or such other period as the Act or the Rules may prescribe, from the date of last incident.

The procedure and process to be followed in investigating any complaint of Sexual Harassment would be in accordance with the 'The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013', and Rules made there under to the extent the same would be applicable to the Organization.

6. MISCELLANEOUS

- a. For the purpose of conducting investigation of any complaint filed under the Act, ICC shall have the same powers as a civil court for summoning and enforcing the attendance of any person and examining him on oath, requiring the discovery and production of documents, etc.
- b. This policy may be amended from time to time, as approved by the Board.

ANNEXURE

Composition and contact details of ICCs

HEAD OFFICE AND MUMBAI	
52A, Adi Shankaracharya Marg, Opp. Powai Lake, Powai, Mumbai – 400 072. India. Phone : +91 22 3051 9400	a) Ms. Venita Saldanha, Presiding Officer b) Ms. Kanak Sachin Pawar c) Ms. Sugandha Vaidya d) Mr. Deepak Patel e) Ms. Hindprabha Karve, external member
BANGALORE	
105x,3Main, 3Cross,Stagell, Goraguntepalya Yeshwanthpur Industrial Suburb, Bangalore- 560 022. Phone : +91-80-23578658/23578659	a) Ms. Kashibai Alage, Presiding Officer b) Ms. Deepika B H c) Mr. K. Ravi Kumar d) Ms. Hindprabha Karve, external member
BARODA	
Office no. 710-711, Neptune Edge, Neptune Campus, Dr. Vikram Sarabhai Marg, Vadiwadi, Vadodara – 390 007.Gujarat. Phone: 0265-4004363	a) Ms. Rameshwari Vyas, Presiding Officer b) Ms. Apeksha Sachin Pagedar c) Mr. Mihir Upadhayay d) Ms. Hindprabha Karve, external member
BHOPAL	
2 nd Floor, House No.277, Suresh Santosh Bhawan, Bharat Nagar, Narela Sankri Bhopal – 462022 Phone : +91 755 2601184/4034526	a) Ms. Rameshwari Vyas, Presiding Officer b) Mr. Deep Kumar c) Ms. Smita Deepak Jadhav d) Mr. Prashil Waghmare e) Ms. Hindprabha Karve, external member
BHUBANESWAR	
A-35, Ground Floor, BDA, HIG Duplex, Palaspalli, Bhubaneshwar – 751020 Phone: +91 674 3585 481	a) Ms. Kanak Sachin Pawar, Presiding Officer b) Ms. Sugandha Vaidya c) Mr. Satyabrata Dash d) Ms. Hindprabha Karve, external member
CHENNAI	
6 th Floor, B Wing, KGN Towers, No.62, Ethiraj Salai, B Wing, Egmore Chennai – 600 008. Phone: 91-44-28254615/28254973	a) Ms. Nandhini, Presiding Officer b) Ms. Logeshwari Gunasekaran c) Mr. M. Shanmugavelu d) Mr. Suresh Nathan e) Ms. Hindprabha Karve, external member
HYDERABAD	
House#1-2-48/1, C-7A First Floor Street no.03, Kakatiyanagar, Habsiguda, Hyderabad – 500007. Phone: 91-40-27152110	a) Ms. Smita Deepak Jadhav, Presiding Officer b) Ms. Sugandha Vaidya c) Mr. Srikant Kulkarni d) Ms. Hindprabha Karve, external member
JAIPUR	
1 st And 2 nd Floor, B-11g, Ceg Tower, Industrial Area, Malviya Nagar, Jaipur, Rajasthan, 302017 Phone: 014 14805672	a) Ms. Pushpa Sharma, Presiding Officer b) Ms. Smita Deepak Jadhav c) Mr. Neeraj Kumar d) Ms. Hindprabha Karve, external member

KOLKATA	
Diamond Heritage, Unit 710 & 711, 7 th Floor, 16, Strand Road, Kolkata – 700 001. Phone: 91-33-40705183/184/185	a) Ms. Manju Aswani, Presiding Officer b) Ms. Samprita Choudhury c) Mr. Somesh Dutta d) Ms. Hindprabha Karve, external member
NEW DELHI	
104, Copia Corporate Suites, District Centre, Jasola, New Delhi – 110025 Phone: 91-11-49845600	a) Ms. Antra Sinha, Presiding Officer b) Ms. Anjuna Rawat c) Mr. Prakash Nayal d) Mr. Aftab Alam e) Ms. Hindprabha Karve, external member
PUNE	
A-503, 5 th Floor, Mayfair Tower No.1, Old Mumbai Pune Road, Wakdewadi, Shivajinagar, Pune – 411 005. Phone: 91-20-66003236/66003260	a) Ms. Vaishali Mathadhikari, Presiding Officer b) Ms. Kanchan Ramgan Gautam c) Mr. Nitin Ranaware d) Ms. Hindprabha Karve, external member
VISAKHAPATNAM	
D.No.7-18-1, Kirlampudi Layout, Waltair Uplands, Visakhapatnam – 530017 Phone: 91-891-2704319/2523878/877	a) Ms. Smita Deepak Jadhav, Presiding Officer b) Ms. Sugandha Vaidya c) Mr. K. V. Narasimha Rao d) Ms. Hindprabha Karve, external member