

SNF India Private Limited.

HR Policy

Policy on POSH (Prevention of Sexual Harassment at workplace)

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1. OBJECTIVE AND SCOPE OF THE POLICY

Sexual Harassment violates an individual's dignity and may have significant adverse effects on the harassed individual, their family, colleagues, and the entire organization. It results in violation of the following rights of a woman:

- 1.1. Right to equality under Articles 14 and 15 of the Constitution of India;
- 1.2. Right to life and to live with dignity under article 21 of the Constitution; and
- 1.3. Right to practice any profession or to carry on any occupation, trade, or business which includes a right to a safe environment free from Sexual Harassment.

The PoSH policy ("**Policy**") is a statutory requirement that seeks to protect individuals from Sexual Harassment at their Workplace. And, while this policy is gender neutral, certain provisions are applicable only to Aggrieved Person (defined below) who is a woman.

SNF India Private Limited ("**Company**" or "**SNF**") is an equal employment opportunity company and is committed to creating a healthy working environment that enables all individuals to work without fear of prejudice, gender bias and in a harassment free workplace without regard to race, caste, religion, colour, ancestry, marital status, gender, age, nationality, ethnic origin, or disability. The Company also believes that all individuals at the Company have the right to be treated with dignity. Sexual harassment at the Workplace involving any individual is a grave offence and is therefore, punishable.

This Policy is applicable to all individuals at the Workplace and is deemed to be incorporated in the service conditions of all Employees of the Company in India.

This Policy aims to prevent Sexual Harassment of individuals in the workplace by promoting a safe and respectful work environment. This policy should be read and interpreted in conjunction with SNF India's Code of Conduct.

2. INTRODUCTION

At SNF India, all individuals are expected to uphold the highest standards of ethical conduct at the Workplace and in all their interactions with each other. This means that individuals have the responsibility to:

- 2.1. Treat each other with dignity and respect;
- 2.2. Follow the letter and spirit of law;
- 2.3. Refrain from any unwelcome behaviour that has sexual connotation (of sexual nature);
- 2.4. Refrain from creating hostile atmosphere at workplace including via Sexual Harassment; and
- 2.5. Report Sexual Harassment experienced and/or witnessed to appropriate authorities and abide by the complaint handling procedure of the Company.

This Policy has been framed in accordance with the provisions of "The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013" and rules framed thereunder (hereinafter "the Act"). Accordingly, while the Policy covers all the key aspects of the Act, for any further clarification reference shall always be made to the Act and the provisions of the Act shall prevail. If any aspect relating to Sexual Harassment not explicitly covered in this Policy is provided for by the Act, then the Act will be applicable.

This Policy provides protection against Sexual Harassment of any individual at Workplace and the prevention and redressal of complaints of Sexual Harassment and matters related to it.

3. DEFINITIONS

- 3.1. **“Sexual Harassment”** includes any one or more of the following unwelcome acts or behaviour (whether directly or by implication), but not limited to:
- 3.1.1. ***Any unwelcome sexually determined behaviour, or pattern of conduct, that would cause discomfort and/or humiliate a person at whom the behaviour or conduct was directed namely:***
- 3.1.1.1. Unwelcome sexual advances involving verbal, non-verbal, or physical, conduct, or in any other form and whether implicit or explicit;
 - 3.1.1.2. Physical contact and advances including (but not limited to) touching, stalking, sounds which have explicit and /or implicit sexual connotation/overtones, molestation;
 - 3.1.1.3. Teasing, voyeurism, innuendos and taunts with implicit sexual connotation, physical confinement and /or touching against one’s will;
 - 3.1.1.4. Demand or request for sexual favours;
 - 3.1.1.5. Sexually coloured remarks or remarks of a sexual nature about a person’s clothing or body;
 - 3.1.1.6. Display of pictures, signs etc. with sexual nature/ connotation/ overtones in Workplace;
 - 3.1.1.7. Showing pornography, making, or posting vulgar / indecent / sexual pranks, teasing, jokes, demeaning or offensive pictures, cartoons or other materials through email, SMS, MMS, gestures etc;
 - 3.1.1.8. Repeatedly asking to socialize during off-duty hours or continued expressions of sexual interest against a person’s wishes;
 - 3.1.1.9. Giving gifts or leaving objects that are sexually suggestive;
 - 3.1.1.10. Eve teasing, innuendos and taunts, physical confinement against one’s will or any such act likely to intrude upon one’s privacy;
 - 3.1.1.11. Persistent watching, following, and contacting of a person;
 - 3.1.1.12. Sharing any inappropriate content on emails or messages or any other online communication channels;
 - 3.1.1.13. Requesting video calls or making phone calls, without any justification, after office hours; and
 - 3.1.1.14. Any other unwelcome physical, verbal, or non-verbal conduct of sexual nature.
- 3.1.2. ***The following circumstances if it occurs or is present in relation to any sexually determined act or behaviour amount to Sexual Harassment, but not limited to:***
- 3.1.2.1. Implied or explicit promise of preferential treatment in employment;
 - 3.1.2.2. Implied or explicit threat of detrimental treatment in employment;
 - 3.1.2.3. Implied or explicit threat about the present or future employment status;
 - 3.1.2.4. Interference with the person’s work or creating an intimidating or offensive or hostile work environment; or
 - 3.1.2.5. Humiliating treatment likely to affect health or safety.
- 3.2. **Aggrieved Person:** In relation to the Workplace, any individual, of any age, whether employed or not, who alleges to have been subjected to any act of Sexual Harassment by the Respondent.
- 3.3. **Complainant:** Any Aggrieved Person or any other person representing the Aggrieved Person who makes a complaint alleging Sexual Harassment under this Policy.
- 3.4. **Respondent:** A person against whom a complaint of Sexual Harassment has been made by the Aggrieved Person under this Policy.

3.5. **Employee:** A person employed at the Workplace, 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 coworker, a contract worker, probationer, trainee, apprentice or called by any other such name.

3.6. **Employer:** A person responsible for management, supervision, and control of the Workplace.

3.7. **Workplace:**

3.7.1. Interaction amongst the Company's Employees, irrespective of the location or timings.

3.7.2. Interaction between the Company's Employee and a third party during employment including official events, accommodation and transportation provided by the Employer for undertaking a journey.

3.7.3. Interactions between any Employee/a third party having a business relationship with the Company and a visitor to the Company's premises/events.

4. PROHIBITION OF SEXUAL HARASSMENT

4.1. The Company strictly prohibits Sexual Harassment of any individual in the Workplace, regardless of form or whether it is explicit or implied.

4.2. Sexual Harassment may occur not only where a person uses sexual behavior to control, influence or affect the career, salary, or job of another person, but also between the Employees from same hierarchical level. It may also occur between an Employee and someone that the Employee deals with in the course of their work, who is not employed by the Company.

4.3. An alleged act of Sexual Harassment committed during or outside of office hours falls under the purview of this Policy. Further, it is important to note that whether harassment has occurred or not does not depend on the intention of the harasser, but on the experience of the victim.

5. PREVENTION OF SEXUAL HARASSMENT

5.1. The Company believes that Sexual Harassment can and must be eliminated through awareness.

5.2. The Company will spread awareness within its organization through periodic communications about Sexual Harassment and its consequences for the organization and the individuals involved.

5.3. The Company will also take other appropriate steps as may be required to prevent and eliminate Sexual Harassment from its Workplace, such as conducting training programme.

6. ROLES AND RESPONSIBILITIES

It is the responsibility of all individuals at Workplace to respect the rights of others and to never encourage harassment. It can be done by:

- 6.1. Refusing to participate in any activity which constitutes harassment;
- 6.2. Supporting the person to reject unwelcome behaviour; or
- 6.3. Acting as a witness if the person being harassed decides to lodge a complaint.

7. REDRESSAL MECHANISM – FORMAL INTERVENTION

Any complaint under this Policy shall be followed by a formal redressal mechanism as described below:

7.1. Internal Complaints Committee

To prevent instances of Sexual Harassment and to receive and effectively deal with complaints pertaining to the same, Internal Complaints Committees (“ICC”) have been established at each location of the Company. The ICC will comprise of a Presiding Officer, Internal Members and External Members. The details of the ICC are provided in **Annexure-1**.

7.2. Lodging a Complaint

- 7.2.1. An Aggrieved Person may make, in writing, a complaint of Sexual Harassment at Workplace to the ICC within a period of three (3) months from the date of incident/ last incident. The ICC can extend the timeline by another three (3) months for reasons recorded in writing.
- 7.2.2. The complaint shall be submitted by the Complainant to the ICC in writing (format provided in **Annexure-2**) or shall be submitted to the ICC electronically at anita.s@snf.com. The complaint can also be physically submitted to any ICC member.
- 7.2.3. The ICC will provide assistance in making the complaint as may be required. The ICC may also require the Company to implement measures to protect the Complainant, alleged victim, and witnesses against any retaliation or to maintain a safe and healthy working environment while the complaint is pending.
- 7.2.4. The procedures and time frames for filing, investigating, and deciding complaints; and rights and obligations of the parties involved in the complaint are detailed in **Annexure-3**.
- 7.2.5. If the ICC requires the parties to a complaint to attend an inquiry, hearing or to cooperate for the purposes of inquiring into a complaint (whether in person or by electronic means), it is mandatory for them to attend and/or cooperate as requested.
- 7.2.6. Where a woman has complained of Sexual Harassment and either party is unhappy with the ICC’s decision or if the Complainant is unhappy with the action taken against the harasser, they may appeal to the appropriate appellate authority appointed by the government within ninety (90) days from the date of the ICC’s decision. The Chairman and Managing Director and/or any person so authorized by the Company will provide information on the appropriate authority at the relevant time.

7.3. Resolution procedure through conciliation

- 7.3.1. Once the complaint is received and before initiating the inquiry, the ICC may take steps to conciliate the complaint between the Complainant and the Respondent, if requested by the Aggrieved Person.

- 7.3.2. The procedure, time frames, and the rights and obligations of the parties involved in the conciliation process are detailed in **Annexure-3**.

8. PUNISHMENT AND PENAL CONSEQUENCES FOR SEXUAL HARASSMENT

- 8.1. **Punishment for Sexual Harassment:** The Company shall take actions as recommended by the ICC against any Employee who is found guilty of Sexual Harassment after due inquiry by the UCC. Such action may include one or more of the following:
- 8.1.1. Mandatory counselling sessions or community service;
 - 8.1.2. Censure or reprimand;
 - 8.1.3. Apology to be tendered by harasser;
 - 8.1.4. Written warning;
 - 8.1.5. Withholding promotion and/or increments;
 - 8.1.6. Suspension from employment;
 - 8.1.7. Termination from employment; or
 - 8.1.8. Any other action that the Employer may deem fit.
- 8.2. Any person who is found guilty of Sexual Harassment of a woman after due inquiry by the ICC shall also be liable to pay compensation to the woman as may be decided by the ICC in accordance with the law.
- 8.3. **Penal Consequences for Sexual Harassment:** Where the Aggrieved Person is a woman and she chooses to file a police complaint, the Employer will provide all the necessary assistance to file such complaint by the Aggrieved Person.
- 8.4. The following acts of Sexual Harassment are categorized as criminal offences under the Indian Penal Code and are punishable as described below:
- 8.4.1. physical contact and advances involving unwelcome and explicit sexual overtures;
 - 8.4.2. a demand or request for sexual favours;
 - 8.4.3. showing pornography against the will of a woman;
 - 8.4.4. making sexually colored remarks.

The offences under (8.4.1), (8.4.2) and (8.4.3) are punishable with rigorous imprisonment of up to three (3) years and a fine of an amount as may be decided by a court. The offence under (8.4.4) is punishable with simple or rigorous imprisonment of up to one (1) year and/or a fine of an amount as may be decided by a court.

9. CONSEQUENCES OF MAKING MALICIOUS ALLEGATIONS

- 9.1. Where the ICC arrives at the conclusion that the allegation against the Respondent is malicious or the Aggrieved Person or any other person making the complaint has made the complaint knowing it to be false or the Aggrieved Person or any other person making the complaint has produced any forged or misleading document, it may recommend to the Employer to take action against the individual or the person making the complaint.
- 9.2. While deciding malicious intent, the ICC should consider that mere inability to substantiate a complaint need not mean malicious intent.

10. CONFIDENTIALITY

- 10.1. The identity of the Complainant, Respondent, witnesses, statements, and other evidence obtained in the course of inquiry process, recommendations of the ICC, action taken by the Employer is considered as confidential materials, and not published or made known to anyone.
- 10.2. Such information may be disclosed to the ICC or parties involved in the complaint and, to a limited extent only to those persons strictly on a “need to know” basis and who are expected to implement the decisions of the ICC.
- 10.3. Any person contravening the confidentiality clauses shall be liable to pay the Company a fine of Rupees Five Thousand (Rs. 5000) and may also be subject to punishment as per the recommendations of the ICC.

11. AMENDMENTS

The Company may amend this Policy and the related Annexure(s) from time to time to reflect any changes in the applicable laws or even otherwise to ensure that its Workplace is free from Sexual Harassment.

OFTEN, EVEN AFTER BEING SUBJECTED TO SEXUAL HARASSMENT, INDIVIDUALS CHOOSE TO REMAIN SILENT FOR FEAR OF EMBARRASSMENT OR BECAUSE THEY PREFER NOT TO SPOIL THEIR WORK RELATIONS. WE URGE EACH OF YOU TO PUT ASIDE ANY FEARS OF EMBARRASSMENT AND SPEAK UP AGAINST SEXUAL HARASSMENT AT THE WORKPLACE. YOU HAVE THE RIGHT TO HALT ANY UNWELCOME SEXUAL ADVANCES AT ANY TIME, REGARDLESS OF ANY PREVIOUS BEHAVIOUR OR SIGNALS.

This Policy has been drafted in accordance with the broad contours provided under the POSH Act and Rules. The Company may deviate from the procedures mentioned in this policy according to its discretion and within the limits of the POSH Act and Rules.



KUMARESAN RAJENDRAN
Chairman And Managing Director

Above policy approved by CMD to be circulated to all SNF India Pvt Ltd employees.

ANNEXURE-1

Constitution of Internal Complaints Committee (IC)

The POSH Committee is constituted with effect from July 1st, 2023 till June 30th, 2026

The list of new committee members nominated are as follows:

No	Name	Role	Ext./ Phone	Email	Date of Appointment
1	Ms. Anita Sahu	Presiding Officer	0891-6198803	anita.s@snf.com	01 st July 2023
2	Ms. Aalithi Sai Sri Bhavani	Internal Members	0891-6198788	bhavani@snf.com	01 st July 2023
3	Ms. Perla Yamuna		0891-6198824	pyamuna@snf.com	01 st July 2023
4	Mr. Y Sirish Kumar		0891-6198828	sirishkumar.y@snf.com	01 st July 2023
5	Mr. P Appalanaidu		0891-6198731	apotnuru@snf.com	01 st July 2023
6	Dr. Jonnalagadda Vanaja	External Member	09963354205	vanajajonnalagadda58@gmail.com	01 st July 2023



KUMARESAN RAJENDRAN
Chairman And Managing Director

ANNEXURE- 2

Complaint and Redressal Form under POSH Policy

Name of the Employee		Contact Number	
Emp. ID.		E.mail ID.	
Designation		Department	

Description of Complaint:

Signature of the Employee

Date :

Description of Complaint and corrective action:

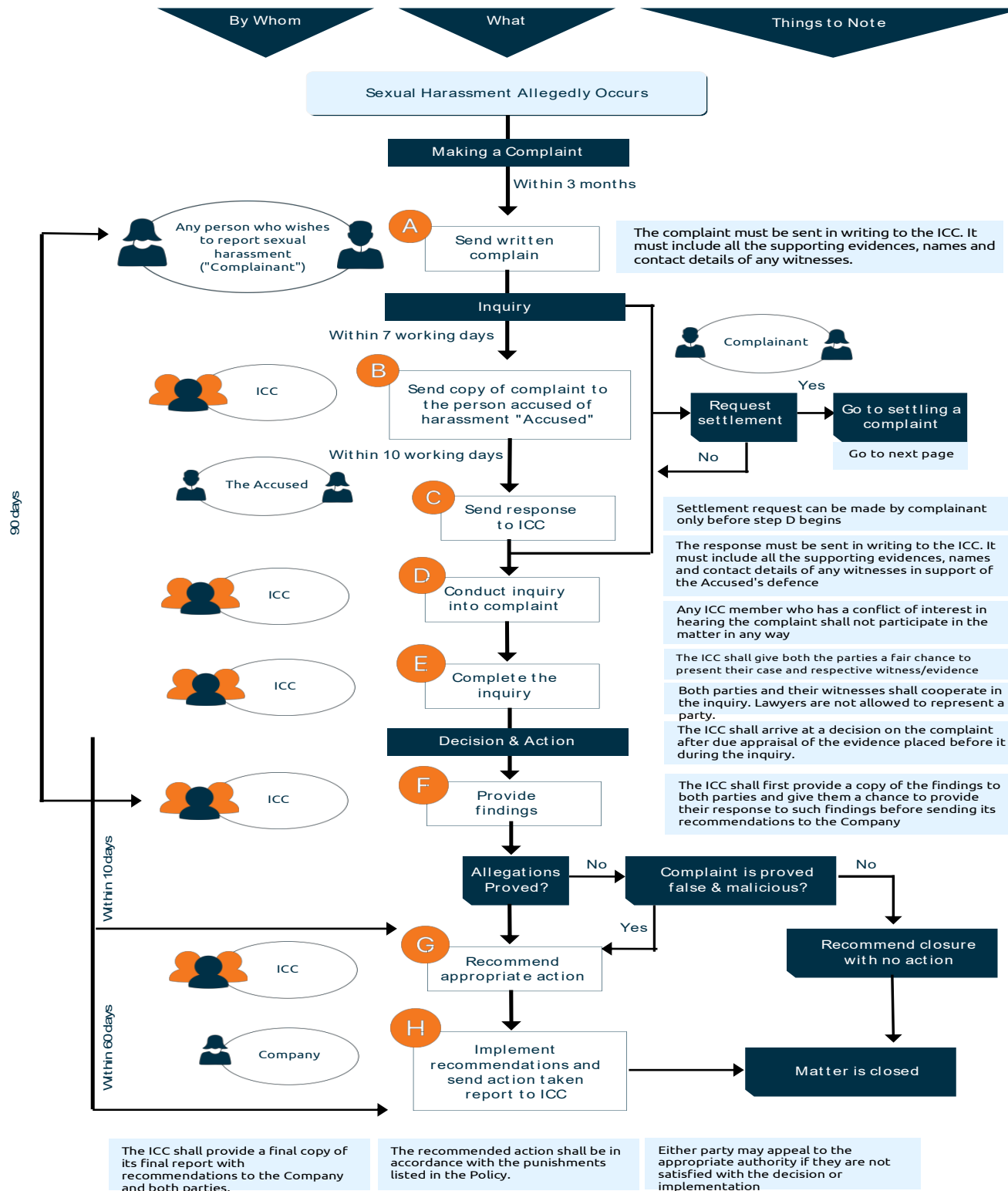
Signature of the Employee

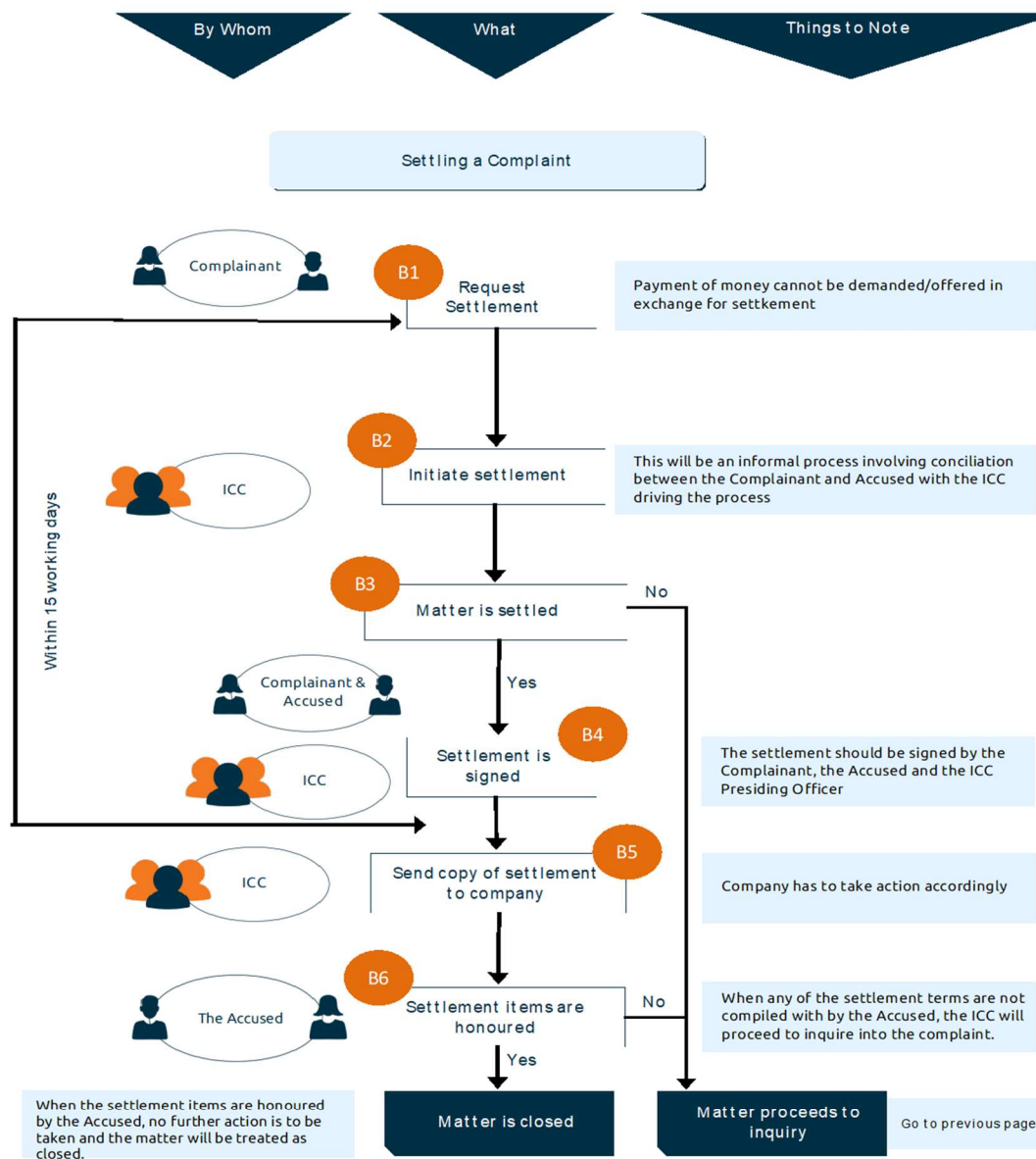
Date :

Signature of the Chairperson

Date :

ANNEXURE- 3





Other Important Rules applicable to the Grievance Redressal Process:

1. The Accused should refrain from interacting with the Complainant and any of the Complainant's witnesses or retaliating against them in any manner.
2. Both parties and their respective witnesses shall appear before the ICC whenever required for the purposes of the Inquiry. They shall also produce all necessary information and/or documents demanded by the ICC in relation to the inquiry of the Complaint.
3. During the pendency of the Inquiry, the Complainant may request the ICC to:
 - a. transfer the Complainant or the Accused to another office of the Company;
 - b. grant her/him leave from work;
 - c. prohibit the Accused from appraising the work performance of the Complainant and her/his witnesses.
4. The ICC will consider such requests but is not bound to accept the same if it believes the situation does not warrant it. If the ICC accepts the request, it will recommend implementation of the same to the Company. However, it cannot recommend grant of leave exceeding 3 months. The Company will report back to the ICC on the implementation of the recommendations.
5. Information regarding the Complaint or the inquiry or the names or addresses of the parties involved or action taken shall not be disclosed to anyone except those involved in the inquiry and implementation of the ICC's recommendations.