



# ANTI SEXUAL HARASSMENT POLICY

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## 1. WHY THIS POLICY

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Sigmoid is committed to providing a workplace that is free of harassment and bullying irrespective of their gender, race, caste, creed, religion, place of origin, sexual orientation, disability or economic status. Sigmoid employees have the right to work in an environment free from any form of discrimination and conduct which can be considered harassing, coercive, or disruptive particularly behaviors that tantamount to sexual harassment as defined in this policy. This policy ("**Policy**") will assist individuals who believe they have been subjected to sexual harassment seek support and remedial action.

## 2. SCOPE AND APPLICABILITY

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The Policy will apply to all individuals engaged by or associated with the Company, regardless of their position, including consultants, contract workers, trainees, vendors and visitors on the premises.

It prohibits sexual harassment of women by men, of men by women or between the same sexes. Sexual harassment is unlawful irrespective of who is involved in the behavior.

## 3. WHAT CONSTITUTES SEXUAL HARASSMENT

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Sexual Harassment includes any one or more of the following unwelcome acts or behaviors (whether directly or by implication):

- Physical contact and advances
- A demand for request for sexual favors
- Making sexually colored remarks
- Showing pornography
- Any other unwelcome physical, verbal or non-verbal conduct of sexual nature

Further, the following circumstances may amount to sexual harassment if it occurs or is present in relation to any other act of 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 present or future employment status
- Interference with work or creating an intimidating or offensive or hostile work environment
- Humiliating treatment likely to affect health or safety

An indicative list of behaviors that constitute sexual harassment is enclosed at **Appendix A**.

## 4. PROHIBITION OF WORKPLACE SEXUAL HARASSMENT

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Sigmoid has a 'zero-tolerance' approach to any instance of sexual harassment. Sexual harassment of any [individual] at the Sigmoid workplace, whether during or after office hours, is strictly prohibited under law and this Policy. For the purpose of this Policy, it is clarified that 'workplace' also includes any place visited by an employee arising out of or during the course of employment.

## 5. INTERNAL COMPLAINTS COMMITTEE

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The Sigmoid has constituted an Internal Complaints Committee ("**ICC**") to investigate into allegations of Sexual Harassment at the Company's workplace. The Company reserves the right to add to, remove or replace the ICC members from time to time. Please see **Annexure A** for details of members of the Sigmoid ICC.

## 6. REPORTING SEXUAL HARASSMENT

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Complaints under this Policy may be lodged with any member of the ICC.

Complaints should be made in writing or via email (as soon as possible, not later than 3 months from the date of occurrence of the incident alleged to constitute sexual harassment (in case of a series of incidents, within a period of 3 months from the date of the last incident). The aggrieved individual may request the ICC to provide reasonable assistance for making the complaint in writing. In case the complainant is under any physical or mental incapacity, the complaint can be made by the legal heir or any other person authorized in writing by the complainant. Hard-copy complaints should be submitted to HR and email complaints should be sent to ICC. All complaints, whether in hard-copy or email form, should be clear and should include details of the incident or incidents, supporting documents, names of individuals involved and the names and addresses of the witnesses. [The ICC may extend the time limit not exceeding three months, if it is satisfied that there were unavoidable circumstances which prevented the aggrieved woman from filing a complaint within the said period.]

[If the complainant would like to initiate action under the Indian Penal Code, 1860 ("IPC"), she may inform the ICC of the same, and the Sigmoid shall provide necessary assistance to file such complaint.]

## 7. RESOLUTION PROCESS

**Conciliation:** Before the ICC initiates an inquiry into the complaint, the complainant may request the ICC to settle the matter between the complainant and the respondent through conciliation before initiating an inquiry. However, no monetary settlement shall be made the basis of the conciliation. In the event a settlement has been reached, further inquiry shall not be conducted.

**Inquiry:** All claims of sexual harassment will be promptly and thoroughly investigated by the ICC in accordance with the principles of natural justice and the provisions of law. Neither the complainant nor the respondent shall be allowed to bring in any legal practitioner to represent them in their case at any stage of the proceedings before the ICC.

The ICC shall submit an enquiry report to the Sigmoid authorized representative upon conclusion of the inquiry. The report of the ICC shall be deemed to be the enquiry report for purposes of any disciplinary rules applicable to the employee against whom a complaint of sexual harassment was made. Where the ICC determines that the allegation against the respondent has been proved, it may recommend to the Sigmoid to take action for sexual harassment as misconduct in accordance with the provisions of the Company's applicable policies.

In the event the ICC determines that the complaint is false or malicious, the ICC may recommend to the Sigmoid to subject the individual making the false complaint to disciplinary action, up to and including termination of employment. It is hereby clarified that mere inability to substantiate a complaint or provide adequate proof shall not attract action against the complainant.

Disciplinary actions for cases of sexual harassment may range from oral/written warnings to extension of probation, transfer, demotion including termination from the services of the organization.

## 8. PROTECTION AGAINST RETALIATION

Sigmoid forbids any form of retaliation or victimization against anyone who has filed a complaint of workplace sexual harassment or has cooperated with the ICC in any investigation of a complaint of workplace sexual harassment.

Individuals are encouraged to report to HR if faced with victimization or retaliation.

Retaliation and/or victimization constitute misconduct as per the Sigmoid policy warranting disciplinary action.

## 9. CONFIDENTIALITY

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All incidents/grievances reported will be treated seriously, sensitively and with utmost confidentiality as is practically possible. Contents of the complaint, the identity and addresses of the complainant, respondent and witnesses, any information relating to conciliation and inquiry proceedings, recommendations of the ICC and the action taken by the Company shall be treated as confidential.

If any person entrusted with the duty to handle the complaint, inquiry or any recommendations of the ICC, contravenes his/her confidentiality obligation, he/she shall be liable to disciplinary action, in accordance with the provisions of the Company policies, as applicable.

## 10. CONSENSUAL RELATIONSHIPS

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Sigmoid believes romantic or sexual relationships between a manager or other supervisory employee and his or her staff (reporting directly or indirectly), could create compromising conflicts of interest at work.

It is therefore in the best interest of all concerned, that if there is such a relationship, the involved parties inform management so the reporting chain can be changed to ensure no direct or indirect reporting relationship.

## 11. GENERAL

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All employees at Sigmoid have a responsibility in contributing to a mature and respectful work environment. All employees are personally responsible for their actions and must ensure that their behavior does not constitute sexual harassment whether it happens deliberately or inadvertently.

Sigmoid reserves the right to modify and amend the provisions of this Policy, so as to comply with applicable legal requirements, internal policies, or with a view to fine tune or alter the provisions of this Policy to the extent deemed necessary by Sigmoid from time to time. If any of the provisions contained herein are found to be invalid, illegal or unenforceable in any respect, the validity, legality and enforceability of the remaining provisions shall not in any way be affected or impaired.

Please contact HR for any questions or further guidance in relation to this Policy.





## 12. APPENDIX A

### Sexual harassment may include:

- Using sexually abusive and offensive language or comments that put down people because of their sex or sexual orientation or appearance
- Phone calls or messages on electronic mail or computer networks which are threatening, abusive or offensive to employees in a sexual manner
- Sexual messages, text, or images which may be perceived by the recipient as creating a hostile work environment
- Suggesting or insisting that someone wear revealing clothing
- Intrusive questions about sexual activity, Tales of sexual exploits, Comments about people's (women/men) bodies or intruding on the privacy of an employee
- Repeated requests for sexual favors, sexual advances or repeated pressure for dates and social contact especially when person invited has refused/ignored similar invitations
- Sexually suggestive comments, sexually colored propositions, insults or threats
- Telling lewd jokes about sex or sexual orientation
- Offensive language that insults/demeans including using terms of endearment; and
- Singing or humming vulgar songs, ballads or words
- Graphic descriptions of pornography including graffiti in the office premises
- Displaying of books, photographs, paintings, films, pamphlets, packages, etc. containing 'indecent representation of women/men'
- Material that is sexual in nature, sexist, sexually explicit is displayed in the workplace, circulated, or put in someone's workplace or belongings, or on a computer or fax machine or on the internet or any other public display system or public in the work premises
- Offensive gestures, staring, leering or whistling with the intention to insult or discomfort another
- Even if not directly done to a particular individual, uttering a word, making a gesture or exhibiting any object with the intention that such word, gesture, or object be heard or seen by an employee
- Sounds, gestures or display of offensive books, pictures, cartoons, magazines, calendars; or derogatory written materials at one's desk or workplace
- Viewing, showing or mailing pornographic posters, Internet sites, cartoons, drawings
- Suggestive letters, phone calls, electronic instant messaging or e-mail messages
- Intentional touching of the body, example- Unwelcome hugs, kisses, brushing, fondling, pinching, patting etc.
- "Accidentally" brushing sexual parts of the body
- Any displays of affection which can make others uncomfortable or are inappropriate at the workplace even if the recipient welcomes it
- Indecent exposure or coerced sexual intercourse
- Use of technology to induce different remote sensations on the body including, but not limited to pain and sexual stimulation
- Sexual assault or using criminal force to any woman, intending to outrage or knowing it to be likely that he will thereby outrage her modesty



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## 14. ANNEXURE A

### Internal Complaint Committee (ICC)

|                        |                          |
|------------------------|--------------------------|
| <b>Chair Person</b>    | Vanitha D'Silva          |
| <b>Member</b>          | Mousumi Kar              |
| <b>Member</b>          | Piyush Khemka            |
| <b>Member</b>          | Pallav Kumar             |
| <b>External Member</b> | Aparna Nair              |
| <b>Email ID</b>        | icc@sigmoidanalytics.com |