

## Prevention on Sexual Harassment

### **(A) Objective**

**Cubedots Pvt. Ltd** is committed to ensure a safe, secure and congenial work environment where employees will deliver their best without any inhibition, threat or fear. This Policy is made in accordance with Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act 2013 and the rules and regulations formulated thereunder (“**Act**”) to prevent sexual harassment and redressal of complaints in relation to sexual harassment at the Company.

### **(B) Applicability**

This Policy is applicable to all female / women employees (permanent, temporary and trainee) working at the offices of the Company.

### **(C) Complaint Mechanism and Internal Complaints Committee**

#### **(1) Purpose of the Committee**

This Committee has been established in line with the Company’s strong commitment to have a workplace free from sexual harassment. The Internal Complaints Committee is responsible for investigating every form of complaint (written or otherwise) of sexual harassment, conducting enquiry and recommending appropriate remedial measures in response to any substantiated allegations of sexual harassment and for generally discouraging and preventing employment-related sexual harassment.

#### **(2) Constitution of the Internal Complaints Committee**

The Internal Complaints Committee shall comprise of the following members:

- A Presiding Officer who shall be a woman employed at a senior level at the workplace
- At least 2 members, from among the employees who are committed to the cause of women or who have had experience in social work or have legal knowledge
- One member from among the NGO or association committed to the cause of women or a person familiar with the issues relating to sexual harassment.)

At least one half of the total members shall be women.

**(3) Tenure:**

The Presiding officer and every member of the Internal Complaints Committee shall office for a period not exceeding 3 years from the date of their appointment to the Committee.

**(4) Removal:**

The Presiding Officer or any other member of the Committee shall be removed from the Committee in accordance with the provisions of the Act.

**(5) Complaint:**

- a. Any aggrieved woman employee ("**Complainant**") may make a complaint of sexual harassment at the Company, to the Committee in writing immediately on happening of the incident with her but not later than 3 (three) months from the date of the incident and in case of series of incidents, within a period of 3 (three) months from the date of the last incident in accordance with the provisions of the Act.
- b. The Committee shall before initiation of an inquiry, at the request of the Complainant, take steps to settle the matter between her and the person against whom the complaint has been made ("**Respondent**") through conciliation in accordance with the provisions of the Act.
- c. Subject to the provisions of Paragraph 5 (b) above, the Committee shall proceed to make inquiry into the complaint in accordance with the Act. At the time of filing of the complaint, the Complainant shall submit to the Committee 6 (six) copies of the complaint along with supporting documents and names and addresses of witnesses. Further, on receipt of the complaint, the Committee shall send one of the copies received from the Complainant to the Respondent within a period of 7 (seven) working days. The Respondent shall file his reply to the committee along with his list of documents, names and addresses of witnesses, within a period not exceeding 10 (ten) working days from the date of receipt of aforementioned documents. The Committee shall make inquiry into the complaint in accordance with the principles of natural justice. In conducting the inquiry, a minimum 3 (three) members of the Committee including the Presiding Officer or the Chairperson shall be present.

On completion of the inquiry, the Committee shall provide a report of its findings to the Vertical Director of the Company ("**Company Representative**") within a period of 10 (ten) days from the date of completion of the inquiry and such report shall be made available to the concerned parties. In the event that the Committee arrives at a conclusion that the allegation against the Respondent has not been proved, it shall recommend to the Company Representative that no action is required to be taken in the matter.

- d. In the event that the Committee arrives at the conclusion that the allegation against the Respondent has been proved, it shall recommend to the Company Representative: (i) to take action for sexual harassment as a misconduct in such manner as may be prescribed; and (ii) to deduct from the salary or wages of the Respondent such sum as it may consider appropriate to be paid to the Complainant in accordance with the provisions of the Act. The Company Representative shall act upon the aforementioned recommendation within 60 (sixty) days of its receipt by him/her of the same. Further, in such cases, the Committee shall also recommend to the Company Representative to take any action including a (i) written apology; (ii) warning , reprimand or censure; (iii) withholding of promotion; (iv) withholding of pay rise or increments; (v) terminating the Respondent from service; or (vi) undergoing counseling sessions or carrying out community service.
- e. In the event that the Committee 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/witness has produced any forged or misleading document, the Committee may recommend to the Company Representative to take action against the Complainant / witness as the case may be in accordance with the provisions of the Act.
- f. The Committee shall in each calendar year prepare an annual report and submit the same to the Company Representative and the District Officer in accordance with provisions of the Act.

**(D) Confidentiality:**

Notwithstanding anything contained in the Right to Information Act, 2005, the contents of the complaint, identity and address of the Complainant, Respondent and the witness, any information in relation to conciliation or inquiry proceedings, recommendations of the Committee, any action taken by the Company shall not be published, communicated or made known to public, press and media in any manner.

By implementing this policy, the management would like to make the Company a better place to work.

**(E) Miscellaneous:**

The Committee shall ensure that this Policy is displayed at a conspicuous place at all the office locations of the Company. Further, the Committee shall also ensure that the Company shall (i) in its annual report include the number of cases filed (if any) and their disposal; or (ii) report the filings and disposal of the cases to the District Officer.

**INTERNAL COMPLAINT COMMITTEE OF CUBEDOTS PVT. LTD.**

Sr. No.	Name of the committee member	Contact number	Email address
1	Presiding Officer- Neha Sharma	9755096951	<a href="mailto:Neha.sharma@cubedots.com">Neha.sharma@cubedots.com</a>
2	Member- Aishwarya	7566401783	<a href="mailto:aishwarya.tarlekar@cubedots.com">aishwarya.tarlekar@cubedots.com</a>
3	Member- Mehvish Shaikh	7974628978	<a href="mailto:mehvish@cubedots.com">mehvish@cubedots.com</a>
4	Member- Aamir Azri	9752645945	<a href="mailto:aamir.azri@cubedots.com">aamir.azri@cubedots.com</a>
5	External Member- Mr. Sanjiv Tanwar	9899328829	<a href="mailto:Tanwar02@rediffmail.com">Tanwar02@rediffmail.com</a>

**Responsibilities of ICC:**

- Receiving complaints of sexual harassment at the workplace.
- Initiating and conducting an inquiry as per the established procedure.
- Submitting findings and recommendations of inquiries.
- Coordinating with the employer in implementing appropriate action.
- Maintaining strict confidentiality throughout the process as per established guidelines.
- Submitting annual reports in the prescribed format.