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| Company Name: Xebia IT Architect India Pvt. Ltd. | Policy Name: Prevention of Sexual Harassment | Policy # 5 |
| Issued By: HR | Issued on : April 18, 2016 Effective Since : April 18, 2016 | Confidential , Only for internal consumption of Xebia India(Xebia US employees as part of India team will be on a local policy as practiced or defined), Circulation to anyone externally may lead to strict disciplinary action |

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Policy for the Prevention of Sexual Harassment**Purpose**

Xebia IT Architects India Private Limited, hereinafter called XI, recognize that all employees have the right to work in an environment that is free from any form of harassment, including harassment with respect to race, ancestry, color, sex, sexual orientation, place of origin, ethnic origin, citizenship, creed, age, marital or family status and disability. All employees are required to follow the XI Code of Conduct.

As a part of the overarching statement above, XI commits to provide a workplace, free from sexual harassment and provide a mechanism for redressal of any complaints in respect of sexual harassment without fear or threat of reprisals in any form or manner.

Definitions

Sexual harassment is deemed to be misconduct and includes such unwelcome sexually determined behavior (whether directly or by implication) as:

- physical contact and advances; or
- a demand or request for sexual favors: or
- sexually colored remarks: or
- any unwelcome physical, verbal or non – verbal conduct of sexual nature:
- unwelcome or lewd remarks or jokes
- the display of pornographic, racist, or other offensive or derogatory pictures
- leering or other similar gestures
- persistent unwelcome social invitations
- unnecessary or unwelcome physical contact, and
- physical assault.

Scope

The Policy applies to all the employees of XI. It would be restricted to any Sexual harassment or any happenings of this nature on XI premises or during any official event. This policy does not cover any occurrence that might happen between individuals due to personal interactions not related to XI.

Guidelines

XI does not tolerate or condone sexual harassment or other unlawful behavior in the workplace, and or in connection with employment in the Company whether committed by a co-worker, leader, manager, client, contractor (including those working for an agency), supplier, or anyone else.

Actions, behavior, words, jokes or comments that are derogatory and based on any person's gender, race, ethnicity, sexual orientation, age, religion, or disability will not be tolerated by XI.

Furthermore, the policy establishes that any actions which create an impression that objections / complaints about sexual harassment would result in or create disadvantages in connection with employment or work including recruitment or promotion: and or that adverse consequences might result if the victim does not consent to the conduct in question and or objects thereto, and or any actions which creates a hostile work environment would also be viewed as sexual harassment by XI in respect of which appropriate action will be taken in terms of the Policy.

In light of the gravity of any allegation of sexual harassment, any employee who deliberately provides / fabricates false information in connection with a complaint of sexual harassment or investigation in respect thereof will likewise be subject to disciplinary action which could extend up to and include termination of employment.

Anonymous complaints will not be entertained. However, the company will ensure that confidentiality is maintained in respect of both the complainant and the accused to the maximum extent possible.

The Complaints Committee is the inquiry committee formed and deemed to be the Inquiring Authority to inquire into all complaints of sexual harassment.

Committee Members

The Team shall consist of:

Head of the committee: Mrs. Mahua Chakrabarty

External senior member: Mr. S.K. Nanda

Other team members:

- 1) Mr. Pranav Barar
- 2) Mr. Laghu Tiwari
- 3) Mrs. Pratima Pant
- 4) Mrs. Garima Srivastava
- 5) Mrs. Diviya Grover
- 6) Ms. Bhagyalakhmi Ramaiah

The Committee members shall, after considering the findings and recommendations of the inquiry report and after taking into considerations the gravity of the misconduct, previous records (if any) of the employee concerned and other extenuating / aggravating circumstances that may exist, impose such punishment as may be considered necessary and appropriate, including dismissal from the services of XI. The Committee members shall consider the inquiry report and take action thereon within a week's time.

Employee Initiative

Any employee who feels / believes that he or she has been subjected to sexual harassment in the Company, has an obligation and duty to report the same to the Complaints Committee in writing.

It is important to emphasize that regardless of the avenue used to report complaints, employees will not be retaliated against in any way for making a good faith complaint of harassment. However, in the event that an employee deliberately makes or concocts a false complaint / allegation of sexual harassment, such complaint will itself be deemed to be misconduct and will be dealt with seriously and can in some cases lead to termination from employment.

It is reiterated that confidentiality will be maintained at all times by the Committee and or any other person to whom the Complaints are made. Any Leader / Manager to whom a complaint of sexual harassment is made, is liable to submit the same to the Complaints Committee for necessary action.

Process / Procedure in case of a complaint of Sexual Harassment

1. An employee who is aggrieved by any conduct / behaviour or privy to information that amounts to sexual harassment is required to submit a written complaint to the Complaints Committee. The said complaint should contain all available information that the complainant has or is aware of. All complaints shall be treated with full confidentiality. Anonymous complaints will not be entertained by the Company.
2. In any event, it is advisable that a complaint be made within three days from the cause of the complaint.
3. The Complaints Committee shall investigate the complaints so received, and shall thereafter decide on further course of action.
4. In the event that complaint is received against a member of the Complaints Committee, the said member shall not in any event participate in any proceedings connected to the said complaint.
5. The Complaints Committee could, at its discretion depending on the gravity of the allegations, either conduct a detailed inquiry or take other suitable action based on the evidence available.