

Sexual Harassment Policy **@** **Appinventiv**



1. POLICY STATEMENT:

As a Company, we are committed to conducting and governing ourselves with ethics, transparency and accountability and to this, we have developed governance structures, practices and procedures that ensure that ethical conduct at all levels is promoted across our value chain. It is thus in acknowledgement of and consonance with these values, that we are dedicated to ensuring that the work environment is conducive to fair, safe and harmonious relations, based on mutual trust and respect, between all the associates of the Company. We also strive to guarantee a safe and welcoming environment to all those who visit any of our locations in any capacity, such as customers, vendors etc. Discrimination and harassment of any type is strictly prohibited. We wish to promote and maintain this culture to ensure that associates of the Company do not engage in practices that are abusive in any form or manner whatsoever.

The Company aims to provide a safe working environment and prohibits any form of sexual harassment. Hence any act of sexual harassment or related retaliation against or by any associate is unacceptable. This policy therefore, intends to prohibit such occurrences and also details procedures to follow when an associate believes that a violation of the policy has occurred within the ambit of all applicable regulations regarding Sexual Harassment

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Making a false complaint of sexual harassment or providing false information regarding a complaint will also be treated as a violation of policy. Violation of this policy will call for strict disciplinary action up to and including termination

. APPLICABILITY:

This policy will extend to all associates of the Company including those employed as consultant. The policy also extends to those who are not associates of the Company, such as customers, visitors etc., but are subjected to sexual harassment at the Premises (defined hereinafter) of the Company.

DEFINITIONS:

“Sexual harassment” includes any unwelcome sexually determined behavior(direct or implied) such as physical contact and advances, unwelcome communications or invitations, demand or request for sexual favors, sexually cultured remarks, showing pornography, creating a hostile work environment and any other unwelcome “sexually determined behavior” (physical, verbal or non-verbal conduct) of a sexual nature. “Sexual Harassment” would also mean:

i. Quid pro quo sexual harassment, which means something in return or an exchange of one thing for another.

- In the workplace, quid pro quo sexual harassment takes place if sexual favors are asked in exchange for any kind of special treatment on the job. Threatening an associate if he/she does not consent to such sexual advances or favors also amounts to sexual harassment. The act of ‘asking’ may either be verbal or implied and the ‘sexual conduct’ may be verbal or physical. But, in either case, it must be unwelcome

- For eg: Direct or implied requests or offers by any associate for sexual favors In exchange for actual or promised job benefits such as favorable reviews, salary increases, promotions, increased benefits, or continued employment constitutes sexual harassment.

ii. Hostile work environment includes

- Hostile environment sexual harassment occurs when either speech or conduct of a sexual nature takes place, and is seen or perceived as offensive and interferes with the work performance of the recipient, or any one or more associates
- Hostile environment sexual harassment may also include intimidating or harassing conduct that is directed at an individual, or a group of individuals
- It will also mean related retaliation which includes marginalizing someone in

The workplace with regard to his / her roles and responsibilities, socially ostracizing, intimidating someone physically, psychologically, and emotionally or someone close to or related to the victim. This is only an indicative list of the possible acts which could be treated as sexual harassment and is in no way intended to be construed as

an exhaustive list. In countries where local laws / regulations have clearly defined 'sexual harassment' and procedure to address any complaint relating to it, the Interpretation of 'sexual harassment' & the investigation procedure shall be guided in accordance with the local laws / regulations as applicable.

REDRESSAL COMMITTEE:

The Company will have a centralized redressal committee with a representation, to specifically address any complaints of sexual harassment. The Committee will be nominated by the functional CEO of the Company and would be headed by a woman associate. Not less than half of the members would be women. In addition to handling complaints of sexual harassment, the committees will also coordinate preventive activities to create a sexual harassment free atmosphere via:

- Common Info mailers
- Floating Articles on the same, from time to time

PROCEDURE FOR DEALING WITH COMPLAINTS:

FILING OF A COMPLAINT

If any associate believes that (s)/he has been subjected to sexual harassment, such person may file a complaint with any member of the committee or send an email to **Harassment@appinventiv.com**. The committee member on receiving a complaint will intimate the committee head. The committee head would arrange for a meeting within one week of receipt of the complaint for discussing the complaint raised. Complaints must be brought within 3 months of the incident of Sexual Harassment.

Every attempt will be made to get the Complainant to provide the complaint in writing. The complaint shall include the circumstances giving rise to the complaint, the dates of the alleged occurrences, and names of witnesses, if any. The complaint shall be signed by the Complainant. of the incident.

PROCESS OF ENQUIRY

- The Committee will ask the complainant to prepare a detailed statement of incidents/allegations. The statement of allegations will be shared with the accused.

- The accused will be asked to prepare a response to the statement of allegations and submit to the Committee within the given time.
- The statements and other evidence obtained in the inquiry process will be considered confidential.
- The Committee will organize verbal hearings with the complainant and the Accused.
- The Committee will take testimonies of other relevant persons and review the evidence wherever necessary.
- The committee should ensure that sufficient care is taken to avoid any retaliation against the witnesses.
- During the inquiry process, the complainant and the accused would be expected to refrain from any form of threat, intimidation or influencing of witnesses.
- The committee will conduct inquiry in accordance with the practices of natural justice, i.e the Complainant will be offered to the accused for cross-examination and vice versa.
- The Committee will arrive at a decision after carefully and fairly reviewing the circumstances, evidence and relevant statements.
- The Committee will ensure confidentiality during the inquiry process and will ensure that in the course of investigating a complaint:

(i) Both parties will be given reasonable opportunity to be heard along with witnesses and to produce any other relevant documents;

(ii) Upon completion of the investigation, both parties will be informed of the results of the investigation.

- The committee will be empowered to do all things necessary to ensure a fair hearing of the complaint including all things necessary to ensure that victims or witnesses are neither victimized nor discriminated against while dealing with a complaint of sexual harassment. In this regard the committee will also have the discretion to make appropriate interim recommendations in relation to an accused person (pending the outcome of a complaint) including suspension, transfer, leave, change of work location etc.
- The investigation into a complaint will be conducted in such a way as to maintain confidentiality to the extent practicable under the circumstances.
- The committee will investigate and prepare an enquiry report with recommendations within 4 weeks.

DECISION AND ACTION

Once the investigation is completed, a determination will be made regarding the validity of the harassment allegations. If it is determined that harassment has occurred; prompt, remedial action will be taken. The unit HR representative will share the investigation details and the findings thereof with the appropriate functional Head HR and agree on the applicable disciplinary action. This may include some or all of the following:

- Restore any lost terms, conditions or benefits of employment to the complainant.
- Discipline the accused. This discipline can include demotion, suspension, and termination. The disciplinary action will be carried out by the concerned HR department. Such disciplinary action may even include transfer, demotion or termination. All related documents will be maintained in the associate's folder, ensuring confidentiality. This anti-sexual harassment policy shall not, however, be used to raise malicious complaints. If a complaint has been made in bad faith, as demonstrated by clear and convincing evidence, disciplinary action which may include demotion, suspension or termination will be taken against the person raising the complaint. The Chairperson will share the details of all complaints received and redressed with the Corporate Ombudsman on a quarterly basis.

ANNEXURE

I

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RESPONSIBILITY OF ASSOCIATES:

The below is only an indicative list of basic Do's and Don'ts and is in no way intended to be construed as an exhaustive list.

Do's

- Know Appinventiv Anti Sexual Harassment Policy
- Be aware of inappropriate behaviours and avoid the same.
- Say "NO" if asked to go to places, do things or participate in situations that make you uncomfortable.
- Trust your instincts. Walk away from uncomfortable situations.
- Say "NO" to offensive behaviour as soon as it occurs.
- Refrain from taking discriminatory actions or decisions which are contrary to

The spirit of this policy.

- Maintain confidentiality regarding any aspect of an inquiry to which they may be party to.

Don'ts:

- Verbal harassment: Sexually suggestive comments or comments on physical attributes.
- Offensive language that insults or demeans a colleague, using terms of endearment. Singing or humming vulgar songs.
- Requests for sexual favours, sexual advances, coerced acts of a sexual nature.
- Requests for dates or repeated pressure for social contact.
- Discussing sexual activities, sexual prowess or intruding on the privacy of an associates.
- Sexually colored propositions, insults or threats.
- Graffiti in the office premises

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Nonverbal harassment

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- Offensive gestures, staring, leering or whistling with the intention to 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 associates
- Sounds, gestures, display of offensive books, pictures, cartoons, magazines, calendars or derogatory written materials at one's workplace.
- Showing or mailing pornographic posters, Internet sites, cartoons, drawings.
- Suggestive letters, phone calls, SMS, electronic instant messaging or e-mail messages.

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Physical harassment

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- Physical contact or advances
- Intentional touching of the body, e.g. Hugs, kisses, brushing, fondling, pinching etc that make others uncomfortable.
- Any displays of affection that make others uncomfortable or are inappropriate at the workplace

ANNEXURE

II

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GUIDELINES FOR REDRESSAL COMMITTEE

Role of the Committee:

- Review the complainant's complaint in a fair and objective manner
- Help the complainant and the accused find a way of solving the problem
- Determine the facts of the case with the individuals concerned and the witnesses, if any, and prepare a report with the findings
- Be bound in the principle of natural justice and be unbiased in their evaluation

Conciliation:

- The Committee before initiating an inquiry, at the request of the complainant should take steps to settle the matter between the complainant and the accused through conciliation provided that no monetary settlement shall be made as a basis of conciliation
- Where a settlement has been arrived the Committee shall record the settlement so arrived and forward the same to the Head HR –Frameworks to take action as specified in the recommendation.
- The Committee shall provide the copies of the settlement as recorded to the complainant and the accused.
- Where a settlement is arrived no further inquiry shall be conducted by the Committee.

Procedure for dealing with complaints:

General Instructions:

- Any information relating to conciliation and inquiry proceedings, recommendations of the Committee and the action taken shall not be published, communicated or made known to the public, press /media in any manner.
- Where any person entrusted with the duty to handle or deal with the complaint, inquiry or any recommendations or action to be taken,

contravenes, he/s he shall be liable for action as per the company's disciplinary policy.

Committee Members:

The core committee members who will work closely to resolve any kind of violence/harassment against women. Their names along with declaration is enclosed below:

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| Peeyush Singh | Chief Operations Officer |
| Avinash Sharma | V.P Research Development |
| Niketa Saxena | Manager HR |
| Niharika Rawat | Asst. Manager HR |
| Tanya Bajaj | Asst. Manager HR |
| Apeksha Mehta | Team Lead |
| Pooja Chawla | Team Lead |
| Anu Balyan | Associate Tech Lead |
| Payal Adlakha | Process Manager |
| Aanchal | Software Developer-Android |