

Policy on Prevention of Sexual Harassment (POSH)

SAAKHI – INTERNAL COMPLAINT COMMITTEE (ICC)

Control Information	
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Document #	HTC\POL\POSH
Version #	1.1
Release Date	20-May-2025
Document Classification	Protected

Amendment Record

Version #	Description	Sec #	Release Date
1.0	Initial Document Preparation	All	19-Apr-2022
1.1	Grievance of non-sexual nature	All	19-Jul-2023
1.1	Reviewed & observed no changes	All	17-Jun-2024
1.1	Reviewed & observed no changes	All	20-May-2025

1. Purpose

HTC strives to provide an environment that is free from all types of sexual harassments and to promote a healthy and congenial working environment irrespective of gender, caste, creed, or social class of the employees.

2. User of the Document

This policy is applicable to all the associates / consultants / sub-contractors / vendor resources of HTC Global Services (India) Private Ltd. and all its affiliated companies.

3. Definition of Sexual Harassment

Sexual harassment includes unwelcome sexually determined behaviour (whether directly or implication) as:

- physical contact and advances.
- a demand or request for sexual favors.
- sexually colored remarks.
- Showing pornography.
- Implied or explicit promise of preferential treatment in their employment; or threat of detrimental treatment in their employment; or threat of their present or future employment status.
- Interferes with their work or creates an intimidating or offensive or hostile work environment for them; or Humiliating treatment likely to affect their health or safety.
- any other unwelcome physical, verbal, or non-verbal conduct of sexual nature
- This also includes making indecent remarks about looks, clothing, physique, or sending, forwarding, or soliciting sexually suggestive letters, SMS, emails, images, cracking sexual or lewd jokes, etc.

The prevention / elimination of harassment is **EVERYONE'S** responsibility.

- The workplace should be a Respectful Place
- Sexual harassment cannot be tolerated. If found, severe action will be taken based on the investigation

4. Grievance Complaint Procedures

Any individual who wishes to register a complaint about sexual harassment is encouraged to approach any of the committee members of the "SAAKHI" an Internal Committee (IC)

The group mail id of the IC and members' name and contact details are listed below.

Committee Members	Mobile	Email id
Group Mail ID: saakhi.icc@htcinc.com		

Nidhi Khanna (Presiding Officer)	9845280317	nidhi.khanna@htcinc.com
Shalini Nair	9840312010	shalini.nair@htcinc.com
Geetha Mohandass	9566043732	geetha.mohandass@htcinc.com
Vidya Vachaspathi	9740411001	vidya.vachaspathi@htcinc.com
Hemlata Kumari	9972578460	hemlata.kumari@htcinc.com
Hari Seetharaman	9841460140	harikumar.s@htcinc.com
Arun Srinivasan	9940103320	arunsrinivasan.r@htcinc.com
Satish Natarajan	9840733770	satish.natarajan@htcinc.com
Ms. Rajani Nandakumar (NGO representative)	9884488056	rajani.nandakumar@htcinc.com

The Internal Committee (IC) “SAAKHI” will exercise utmost care in treating the entire process with dignity, sensitivity, and confidentiality to the extent possible. All complaints will be taken seriously and will be investigated and dealt with as discreetly as possible. If required, an NGO or other body (third party) who is familiar with the issue of sexual harassment will be involved in the investigation procedure.

- An employee may either submit a written complaint in person or email the complaint to the committee members.
- The committee shall make an inquiry into the complaint in accordance with the principles of natural justice.
- The Internal Committee (IC) shall in each calendar year prepare an annual report and submit the same to the management.
- Management shall include in its annual report the number of cases filed, if any and their disposal under the Act

5. Investigating Procedure

Depending upon the nature of the Complaint, the committee will adhere to the following procedure.

- An enquiry will be initiated through the members of the committee.
- Discussions are conducted with the victim and alleged harasser as required.
- The committee shall have the right to terminate the inquiry proceedings if the allegation is proved to be false, and appropriate action will be taken.
- Written records of all discussions are to be maintained confidentially by the committee.
- All discussions will be recorded in writing, and the committee will maintain confidentiality of the records.
- The committee will submit the Inquiry findings and present the decision and the recommended action to the management.
- The final decision shall be communicated by the committee to the victim and the alleged harasser.

Possible Disciplinary Actions arising out of the Recommendations:

- A letter of warning (MEMO) that will be placed in the personal file of the harasser.

- Immediate transfer or suspension without pay or both.
- Stoppage of increment/Appraisal for one year.
- De promotion.
- Termination/dismissal from the services of the Company.
- Any other action that may deem fit.

6. Grievance of non-sexual nature

Associate facing any issues / unwanted / biased behaviour / bullying / harassing conduct and more activities of **non-sexual nature** can raise their complaints to the HR manager of the respective HTC – India offices.

Waiver and Amendment of the Policy

The Human Resources team will monitor the effectiveness and review the implementation of this Policy, regularly considering its suitability, adequacy, and effectiveness.

The company reserves the right to alter, append or withdraw this policy from time to time either in part or in full based on management's discretion.