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PREVENTION OF SEXUAL HARASSMENT POLICY

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DOCUMENT CONTROL

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ABSTRACT	This document deals with Prevention of Sexual Harassment – guidelines for the management and employees
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AUTHORISATION

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VERSION HISTORY

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Draft 1.0	15/03/2019	Siri	Initial Draft
Issue 1.0	01/08/2019	Lavanya V	Updating of Internal Complaints Committee
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Issue 8.0	24/09/2024	Mrunal Thoolkar and reviewed by Kiran Chopra	IC member name updated for Noida location.
Issue 9.0	02/01/2025	Mrunal Thoolkar and reviewed by Kiran Chopra	IC member name updated for Noida and Pune location.
Issue 10.0	18/06/2025	Mrunal Thoolkar and reviewed by Kiran Chopra	IC member name updated for Delhi location. E-mail IDs for all members updated after domain change. Rebranding & logo change

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1. INTRODUCTION

This policy for prevention of sexual harassment at workplace (“Policy”), has been framed in accordance with the provisions of the sexual harassment of women at workplace (Prevention, Prohibition and Redressal) Act, 2013 (“Act”). Provided, however that in case of any further clarifications, or queries reliance shall be placed on the provisions of the act.

Invenio Business Solutions (“Invenio”) is committed to providing a safe and comfortable work atmosphere for all its employees (defined herein below) and anyone directly in business with Invenio. This policy is constituted on 1st August, 2019 intends to provide the employees and Invenio’s business partners, comfort, safety, and protection to freely pursue their careers/business without any hinderances.

2. PURPOSE & OBJECTIVE

At Invenio, 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 these values, that we are dedicated to ensuring a work environment which is conducive to fair, safe and harmonious relations, based on mutual trust and respect, between all the employees and business partners of Invenio. 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 and wish to promote and maintain this culture to ensure that employees and business partners of Invenio do not engage in practices that are abusive in any form or manner whatsoever.

Invenio aims to provide a safe working environment and prohibits any form of sexual harassment; and any act of sexual harassment or related retaliation against or by any employee is unacceptable. Invenio operates on a zero-tolerance policy for any form of sexual harassment in the workplace; and shall ensure that all incidents and investigations are treated seriously and promptly investigated. This policy, intends to prohibit such occurrences and details procedures to be followed, when an aggrieved individual (defined hereinbelow) believes that a violation of this policy has occurred within the ambit of all applicable regulations regarding sexual harassment

3. SCOPE

This policy shall apply to all Invenio employees irrespective of their position, including those employees working with Invenio on a contract basis. It will also cover those connected with Invenio business, including but not limited to, trainees, consultants, contractors and vendors. Besides office premises, this policy is also applicable during travel to and from office; client locations, around the world; events organized by Invenio such as picnics, team meetings, dinners etc., outside of the office premises.

In countries, where Invenio has a presence and the local laws/regulations have clearly defined sexual harassment and the procedures to address any complaint relating to it, the interpretation of sexual harassment and the investigation procedure shall be, in addition to this policy, guided in accordance with such local laws/regulations as applicable.

4. DEFINITIONS

“Aggrieved Individual” shall mean, in relation to a workplace, an employee or business partner of Invenio, present at the workplace, of any age whether employed or not at Invenio, alleging to have been subjected to an act of sexual harassment by the respondent (defined hereinbelow).

“Employee” shall mean and refer to all persons employed at Invenio for any work on regular, temporary, ad-hoc or daily wages either directly or through its agent, including a contractor, with or without the knowledge of Invenio, whether for remuneration or not, or working on a voluntary basis or otherwise, whether the terms of employment are express or implied and includes a co-worker, a contract worker, probationer, trainee, apprentice or any other name reference.

“Employer” shall mean and refer to all persons who are responsible for management, supervision and control of the workplace including appointment/removal/termination of employees and shall include without limitation, Directors and the Chief Executive Officer (“CEO”).

“IC” shall mean and refer to the Internal Committee and its members as appointed in Invenio.

“Workplace” shall mean and refer to any department, undertaking, establishment, office branch or unit which is established, owned, controlled partially or wholly by Invenio for carrying on professional, commercial, industrial activities including production, supply, sale, distribution or services and includes any place visited by the employee(s) arising out of or during the course of employment including transportation provided for undertaking such journey.

“Respondent” shall mean and refer to the person against whom the aggrieved individual has made a complaint.

5. SEXUAL HARASSMENT

“Sexual Harassment” shall mean and include, without limitation, any one or more of the following unwelcome acts or behavior (whether directly or by implication) namely:

- 5.1.1 Physical contact and advances;
- 5.1.2 A demand or request for sexual favors;

- 5.1.3 Making sexually coloured remarks;
- 5.1.4 Showing/displaying pornography; or
- 5.1.5 Any other unwelcome physical, verbal or non-verbal conduct of a sexual nature (whether on or off office premises; and during or after work hours).

The following circumstances, without limitation to others, if occurs or is present in relation to or connected with any act or behavior, shall amount to sexual harassment:

- 5.2.1 Implied or Explicit promise of preferential treatment during the course of employment;
- 5.2.2 Implied or Explicit threat of detrimental treatment during the course of employment;
- 5.2.3 Implied or Explicit threat about current or future employment status;
- 5.2.4 Interference with employee's work or creating an intimidating/offensive/hostile work environment; or humiliating treatment likely to affect health or safety of such employee.

The above instances and definition are only an indicative list of the possible acts which may be treated as sexual harassment and are in no way intended to be construed as an exhaustive list.

6. PREVENTIVE ACTION

Invenio shall take reasonable steps to ensure prevention of sexual harassment at workplace which may include, among others, circulating/making accessible the applicable policies and other relevant information to all employees, including to all new joiners.

All new joiners and existing employees of Invenio are required to attend awareness sessions on the policy at regular intervals as conducted by Invenio, and as intimated by the Human Resource ("HR") department. employees shall also be subjected to a mandatory annual quiz, which must be submitted by each and every employee in accordance with the instructions provided.

7. INTERNAL COMMITTEE (IC)

7.1 Composition of the IC

An IC shall be constituted and shall consist of the following guidelines for members to be nominated by the management:

- 7.1.1 A presiding officer who shall be a woman employee at a senior level at the workplace.
- 7.1.2 In case a senior female employee is not available in that Invenio location, the presiding officer shall be nominated from any other location.

- 7.1.3 Not less than 2 women members, from amongst employees; preferably committed to the cause of women rights or those who have experience in social work.
- 7.1.4 One member from non-governmental organizations or associations committed to the cause of women rights or an employee familiar with the issues relating to sexual harassment or have the required legal knowledge.
- 7.1.5 Not less than half of the total composition so nominated, must be women.
- 7.1.6 The IC composition of Invenio is provided in Annexure I attached hereto.

7.2 Tenure of IC

The presiding officer/chairperson and every member of the IC shall hold office for a period not exceeding 3 years, from the date of their nomination. The IC members, HR representatives and reporting managers will be provided necessary training inputs to handle such issues effectively and with the required sensitivity and concern.

8. GREIVANCE MECHANISM

- 8.1 If any employee believes that she/he has been subjected to sexual harassment, such aggrieved individual may file a written complaint with any member of the committee within 3 months from the date of incident or in case of series of incidents, within a period of 3 months from the date of the last incident; within 180 calendar days in the case of ex-employees.
- 8.2 In case the aggrieved individual is unable to clearly state the complaint in writing format, any of the IC members may provide aid to such aggrieved individual for submitting the complaint in writing.
- 8.3 In case the aggrieved individual is unable to make a complaint on account of her/his physical or mental incapacity or death or otherwise, her/his legal heir or such other person as may be prescribed may make a complaint.
- 8.4 The aggrieved individual can reach out to any of the IC members.
- 8.5 The IC shall send 1 copy of the complaint to the respondent within a period of 7 working days, seeking a reply with explanation / showcause.
- 8.6 The respondent shall file his/her reply to the complaint along with his/her list of documents and the names and addresses of witnesses in defence, within a period, not exceeding, 10 working days from the date of receipt of complaint copy.

8.7 The IC may, before initiating an inquiry and at the request of the aggrieved individual take steps to settle the matter between her and the respondent through mutual conciliation. However, no monetary settlement shall be made as a basis of conciliation.

8.8 In case a conciliation or settlement is arrived at, the IC shall record the settlement so arrived at and forward the same to the management for taking necessary action. The IC shall also provide copies of the settlement to the aggrieved individual and the respondent. In such a case, no further inquiry would be conducted by IC.

8.9 In case no conciliation or settlement is reached, the IC will proceed to make an inquiry into the complaint, as per the HR policies of Invenio. Such inquiry must be conducted, in accordance with the principles of natural justice and shall be completed within a period of 90 days, the applicable laws being the final guideline.

8.10 However, in case the conciliation or settlement is not feasible, IC must issue notices to the parties for a hearing.

8.11 Neither the aggrieved individual, nor the respondent can bring in any legal practitioner to represent them in their case at any stage.

8.12 The IC will have the right to terminate the inquiry proceedings or give an ex-parte decision, if the aggrieved individual or respondent fails, without sufficient cause, to be present for 3 consecutive hearings. However, such termination or ex-parte would not be passed without giving a notice in writing of 15 days in advance to the concerned parties.

8.13 In conducting the inquiry, a minimum of 3 members of the IC must be present. For the purposes of clarity, Invenio, under this policy mandates 3 IC members to ensure that there is no bias while conducting such investigation.

8.14 On completion of inquiry, the IC shall provide a report of its findings to the concerned parties and Invenio management within a period of 15 days from the date of completion of inquiry.

8.15 The inquiry report shall be made in writing and shall be signed by all the members of the IC. The report shall state reasons upon which the findings have been arrived at; the date of commencement of inquiry, place at which such inquiry was held and the date of inquiry report.

8.16 During the inquiry, the IC may make the following suggestions on behalf of the aggrieved individual:

8.17 To transfer such aggrieved individual or the respondent to another workplace location.;

8.18 To grant leave to the aggrieved individual up to a period of 3 months (in addition to the leave such aggrieved individual is entitled to as the employee of Invenio); for the purposes of clarity, it is up to the management of Invenio to decide the nature of the leave (whether paid or unpaid) provided to such aggrieved individual;

8.19 Restrain the respondent from exercising any authority (administrative, supervisory, evaluating) over the aggrieved individual; or

8.20 Grant such other relief to the aggrieved individual as the case requires and deemed fit by the IC and Invenio.

8.21 Where the IC arrives at the conclusion that the allegation against the respondent is not proved, it shall recommend to the management that no action is required to be taken in the matter.

8.22 Where the IC concludes that the allegation against the respondent has been proved, Invenio shall take appropriate action against the respondent as per the terms prescribed in the act, the relevant HR policies, and any suggestions made by the IC. Such action would be taken within 60 days of the receipt of the inquiry report. While deciding on the action to be taken, Invenio shall also take into consideration the recommendations made by IC in the inquiry report. In case of a prima facie case of sexual harassment, IC shall provide the required assistance to the aggrieved individual, if she/he so chooses, to file a complaint in the local police station in relation to the offence.

8.23 Where the IC comes to the conclusion that the allegation against the respondent is false or malicious or forged or misleading documents have been submitted; Invenio shall take suitable action against such complainant including a written apology, warning, reprimand or censure, withholding of promotion, withholding of pay rise or increments, termination of employment, arranging counselling session(s), or conducting community service. However, mere inability to substantiate a complaint or provide adequate proof need not attract action against the aggrieved individual and the malicious intent needs to be established after an inquiry is conducted as per rules before taking any action.

8.24 If Invenio fails to take appropriate action against the respondent within 60 days of the IC inquiry report recommendations or if the aggrieved individual is found to be false or malicious, an appeal to the relevant court on the IC's decision can be made within 90 days from the date of recommendations.

8.25 The IC must maintain a complaint register and shall provide a quarterly report to the HR Head. The IC must refrain from divulging the details of any complaint(s) or any other

information gathered in the course of an inquiry or the identities of the persons involved in the case, unless required under applicable laws.

8.26 As part of the mechanism, Invenio must prepare and submit an annual report with the following details to the district officer in charge:

- i. Number of complaints received;
- ii. Number of complaints disposed;
- iii. Number of on-going cases;
- iv. Number and nature of action(s); and
- v. Number of workshops or awareness/gender sensitization programs conducted.

8.27 In situations wherein the aggrieved individual has a complaint against any of the IC members, such aggrieved individual may approach the presiding officer directly; or if the complaint is against the presiding officer, the aggrieved individual may approach the HR Head. However, in case the presiding officer and the HR Head are the same person, the aggrieved individual may reach out to the CEO.

8.28 Invenio encourages employees to ensure that they provide formal written complaints regarding such instances. Provided, however, if IC receives an anonymous complaint, it is up to the decision of the IC to initiate proceedings.

8.29 Invenio is committed to ensuring that no employee who brings forward a harassment concern is subject to any form of reprisal. Any reprisal shall be subject to disciplinary action. Invenio shall ensure that the victim or witnesses are not harassed or discriminated against, while dealing with complaints of sexual harassment. Provided, however that in case anyone abuses the procedure (for example: filing a complaint with malicious intent or submitting false documents etc.) shall be subject to applicable disciplinary action.

8.30 IC shall have the necessary powers to take suo motu notice of incidents of sexual harassment and/or gender injustice in the workplace and act against the same in such manner as it deems appropriate.

8.31 This policy and the law prohibits any person including IC members from publishing, communicating or making known to the public, press and media in any manner, contents of the complaint, the identity and addresses of the aggrieved individual, respondent and witnesses, any information relating to conciliation and inquiry proceedings, or recommendations of the IC during the proceedings under the provisions of the act. Any violation thereto shall also be subject to applicable disciplinary action as outlined in the relevant HR policies or the dismissal of position, in the case of an IC member who is not an employee of Invenio.

8.32 Any person aggrieved by the recommendation of IC may prefer an appeal under the relevant provisions of the Act and rules.

9. INVENIO'S DUTIES & OBLIGATIONS

In addition to setting up the appropriate grievance mechanisms in line with the act, Invenio shall also ensure the following:

- 9.1 Provide a safe working environment at the workplace.
- 9.2 Display of IC member details at a conspicuous place in the workplace (on SharePoint and HR MIS tool as well), and the penal consequences of sexual harassment.
- 9.3 Organize workshops and awareness/gender sensitization programs at regular intervals for sensitizing employees with the provisions of this policy and orientation programs for IC members.
- 9.4 Provide all facilities to the IC for dealing with the complaint and conducting the inquiry.
- 9.5 Assist in securing the attendance of respondent and witnesses before the IC.
- 9.6 Make available all information required by the IC for handling the complaint/ inquiry.
- 9.7 Provide assistance to aggrieved individual if he/she so chooses to file a complaint under Indian Penal Code or other laws.
- 9.8 Treat sexual harassment as a misconduct under Invenio's HR policies and initiate appropriate action for such misconduct.
- 9.9 Monitor the timely submission of reports by IC.

10. MISCELLANEOUS

In case of any doubt, or dispute regarding interpretation regarding this policy, the provisions mentioned in the act, read with rules thereunder will prevail.

The policy will come into force with immediate effect.

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FOLLOWS.]**

Annexure I**INTERNAL COMMITTEE (IC)**

Pursuant to the relevant provisions of the act, an IC has been constituted to prevent sexual harassment and to receive and effectively deal with complaints pertaining to the same. Below is the list of members of the IC constituted in Invenio.

Location	Role	Member Name	Contact Number	Official email ID
Pune	Chairperson	Kiran Rammurti Chopra	+91 7507001738	kiran.chopra@invenio-solutions.com
	Member	Yogesh Makarand Gupte	+91 8830690861	yogesh.gupte@invenio-solutions.com
	Member	Kavita Monesh Kumar Pethe	+91 7755911545	kavita.arulkar@invenio-solutions.com
	Member	Pavitra Ravindra Patil	+91 8928750527	pavitra.patil@invenio-solutions.com
	Member	Prashant Deodas Waghmare	+91 9673996629	prashant.waghmare@invenio-solutions.com
	External Representative	Deepti Dole	+ 91 9960349856	doledeepti@gmail.com
Mumbai	Chairperson	Kiran Rammurti Chopra	+91 7507001738	kiran.chopra@invenio-solutions.com
	Member	Sheejo Arvind	+91 9967048859	sheejo.arvind@invenio-solutions.com
	Member	Amrita Vijaykumar Thakur	+919819000446	amrita.thakur@invenio-solutions.com
	Member	Prathamesh Santosh Gandhi	+91 8976106112	prathamesh.gandhi@invenio-solutions.com
	Member	Sneha Narendra Prajapati	+91 9920440314	sneha.prajapati@invenio-solutions.com
	External Representative	Deepti Dole	+ 91 9960349856	doledeepti@gmail.com
Delhi	Chairperson	Kiran Rammurti Chopra	+91 7507001738	kiran.chopra@invenio-solutions.com
	Member	Gaurav Nautiyal	+91 9871462708	gaurav.nautiyal@invenio-solutions.com
	Member	Lucky Goyal	+91 9902977449	lucky.goyal@invenio-solutions.com
	Member	Puneet Singh	+91 9873873783	puneet.singh@invenio-solutions.com
	Member	Saritha Koroth	+91 9958515995	saritha.koroth@invenio-solutions.com
	External Representative	Deepti Dole	+ 91 9960349856	doledeepti@gmail.com
Noida	Chairperson	Kiran Rammurti Chopra	+91 7507001738	kiran.chopra@invenio-solutions.com
	Member	Imtiyaz Khan	+91 9513627033	imtiyaz.khan@invenio-solutions.com
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Hyderabad	Chairperson	Kiran Rammurti Chopra	+91 7507001738	kiran.chopra@invenio-solutions.com
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