



Policy for Implementation of
THE SEXUAL HARRASSMENT OF WOMEN AT WORKPLACE
(PREVENTION, PROHIBITION AND REDRESSAL) ACT 2013

Policy No	Version No	Prepared By	Reviewed By	Approved By	Policy Release / Revision Date

1. Purpose:

Quadrant is committed to creating and maintaining a secure and congenial workplace in which

- ✚ There are no instances of any form of harassment at workplace,
- ✚ Employees, visitors, vendors, partners and all other stakeholders are treated with dignity and fairness.

The policy for prevention of Sexual Harassment ("the policy") outlined here is in accordance with the sexual harassment of women at workplace (Prevention, Prohibition and Redressal) Act 2013

2. Scope and Applicability:

This policy is applicable to all categories of employees irrespective of Gender who are working on Quadrant premises at Hyderabad, Warangal and other workplaces. Such workplaces includes but not limited to: All offices or other premises where the company business is conducted including Work from Home (WFH).

Such work places includes but not limited to:

- ✚ All offices or other premises where the company business is conducted.
- ✚ Places where company related activities are performed or any other site away from the Company premises.
- ✚ Any mode of transport provided by the organization to and from aforementioned locations.
- ✚ All Places where employees are nominated for external trainings, sent on deputation to client site, company sponsored events and during commute provided by company

3. Exception:

In the event practices under this policy conflicts with applicable laws & regulations, the applicable laws will govern this policy.

4. Meaning of Sexual Harassment

Sexual harassment includes all forms of unwelcomed sexually determined behavior (whether directly or by implication) such as:

- 4.1. Physical contact and advances
- 4.2. Demand or request for sexual favor
- 4.3. Sexually colored remarks or remarks of a sexual nature about a person's clothing or body
- 4.4. **Showing** pornography, making or posting sexual pranks, sexual teasing, sexual jokes, sexually demeaning or offensive pictures, cartoons or other materials through email, SMS, MMS etc.
- 4.5. Repeatedly asking to socialize during off-duty hours or continued expressions of sexual interest against a person's wishes
- 4.6. Giving gifts or leaving objects that are sexually suggestive
- 4.7. Eve teasing, innuendos and taunts, physical confinement against one's will or any such act likely to intrude upon one's privacy
- 4.8. Persistent watching, following, contacting of a person either in office or on social media.
- 4.9. Any other unwelcome physical, verbal or non-verbal conduct of sexual nature
- 4.10. Any act which falls into the legal definition of Quid – Pro -Quo and alienation of the person as a consequence of sexual harassment.

5. Definitions:

- 5.1. Aggrieved Person:** In relation to a workplace an employee of any age, whether employed directly or indirectly, vendors, contract and temporarily engaged employees & visitors, who alleges/ complains to have been subjected to any act of sexual harassment by the respondent.
- 5.2. Respondent:** A person against whom a complaint of sexual harassment has been made by the aggrieved person.
- 5.3. Employee (With respect to the Act):** A person employed at the workplace, for any work on regular, temporary, ad-hoc or daily wage basis, either directly or through an agent, including a contractor, with or without the knowledge of the principal management, 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 coworker, a contract worker, probationer, trainee, apprentice or by any other such name.
- 5.4. Workplace:** In addition to the place of work [Head office / Branch offices] it shall also include any place where the aggrieved person or the respondent visits in connection with his/her work, It shall also include places where employees working from Home during the course of and/or arising out of employment/ contract/ engagement.
- 5.5. Management:** A person responsible for management, supervision and control of the workplace.

6. Responding to Conduct in Violation of Policy

- 6.1. Responsibilities of Individuals:** It is the responsibility of all to respect the rights of others and to never encourage harassment. This can be done by:

- ✚ Refusing to participate in any activity which constitutes harassment
- ✚ Supporting the person to reject unwelcome behavior
- ✚ Be a witness if the person being harassed decides to lodge a complaint where one has witnessed the incident of any of the listed action under clause no.4.

All are encouraged to advise others on behavior that is unwelcome. Further, it is important to note that whether the harassment occurred or not, does not depend on the intention of the people but on the experience of the aggrieved person.

- 6.2. Responsibilities of Management:** It is the responsibility of management to

- ✚ Formulate POSH policy
- ✚ Constitute Internal committee
- ✚ Nominate Members
- ✚ Organize awareness meetings
- ✚ Empower IC to redress the complaints received
- ✚ Report out to appropriate authorities

7. Internal Committee (IC)

To prevent instances of sexual harassment and to receive and effectively deal with complaints pertaining to the same, an "**Internal Committee**" is constituted at each location. The detail of the committee is notified to all covered persons at the location (workplace). The committee comprises of:

- ✚ A woman employed at a senior level in the organization or workplace
- ✚ At least 2 members amongst the employees.
- ✚ One external member, familiar with the issues relating to sexual harassment & committed to the cause of women and / or having legal knowledge.
- ✚ At least one half of the total members is women.

At Quadrant, Members of the IC Committee are:

IC Committee (IC)				
Name	Phone Number	Membership Type	Location	Email Address
Balaji Raju D		IC Member	Hyderabad	
Siva Prasad		IC Member	Hyderabad	
Rekha Bathula		IC Member	Hyderabad	
Manjula Bolla		IC Member	Hyderabad	
Sridhar Reddy		IC Member	Hyderabad	

8. Redressal Mechanism:

- 8.1. The concerned employee should give his/her complaint on any sexual harassment in writing to any member of the IC, whose contact details are published by the HR to all the employees.
Alternatively, an employee may bring such complaint to the notice of the internal committee at POSH@quadranttechnologies.com
- 8.2. In case the aggrieved employee is unable to make a complaint on account of his/her physical or mental incapacity or death or otherwise, his/her legal heir or such other person may make a complaint on behalf of the aggrieved employee.
- 8.3. The IC at the request of aggrieved employee may take steps to settle the matter by conciliation before initiating an enquiry. If such conciliation is arrived at, the committee shall provide copies of the recorded settlement to the aggrieved employee and the respondent and no further enquiry shall be conducted in the matter. However, the complaint will be registered by the IC and shall be documented.
- 8.4. If the aggrieved party informs the IC that the terms of settlement have not been complied with by the respondent, the committee shall proceed to make an enquiry into the matter and provide corrective action.
- 8.5. In case where the settlement is not arrived at, or is not requested by the aggrieved employee, the IC shall conduct an enquiry into the matter. For the purpose of making the enquiry, the IC committee can
 - ✚ Summon and enforce the attendance of any person and examining him/her on oath.
 - ✚ Require to do the discovery of documents.
 - ✚ Any other matter that may be prescribed by law.
- 8.6. The investigation shall include hearing the complainant and recording his/her statements collating and reviewing any material as evidence, and interacting and recording the statements of witnesses to the incidents the committee shall also provide a fair opportunity to the respondent to present his/her argument to defend himself/herself.
- 8.7. The enquiry must be completed within a period of 10 Days from the date of complaint received. If requested by the aggrieved employee, pending completion of enquiry, the committee may recommend certain interim reliefs such as:
 - ✚ Transfer the aggrieved employee or the respondent to another work place or location.
 - ✚ Grant leave to the aggrieved employee
- 8.8. The Management shall implement such recommendation and send a report of the same

8.9. Post the inquiry, the committee submits its report containing the findings and recommendations to the management, within 7 days of completion of the inquiry

9. Action to be taken after inquiry

9.1. Complaint substantiated

Where the committee arrives at the conclusion that the allegation against the respondent has been proved, it recommends to the management to take necessary action for sexual harassment as misconduct, in accordance with the applicable service rules and policies, and this may include:

- ✚ Counseling
- ✚ Censure or reprimand
- ✚ Apology to be tendered by respondent
- ✚ Written warning
- ✚ Withholding promotion and/or increments
- ✚ Suspension
- ✚ Termination
- ✚ Or any other action that the Management may deem fit.

9.2. Complaint unsubstantiated

Where the committee arrives at the conclusion that the allegation against the respondent has not been proved with any evidence, the complaint will be open till complete redressal with recommendations submitted to the management who is authorized to deal with case as may deem fit. Mere no evidence does not make the complaint invalid.

Further, the committee ensures that both parties understand that the matter has been fully investigated, and both parties are heard in fairness and equality.

9.3. False Complaint

If a complaint is found to be false and malicious, the complainant shall be liable for appropriate disciplinary action, including severance of employment. However, this shall not include complaints that are difficult to prove or have been made in good faith.

10. Prohibition of Publication or Disclosure of information:

The following information shall not be published, communicated or made known to the public, press or media in any manner

- ✚ Content of the complaint made
- ✚ Identities and addresses of the aggrieved, respondent or the witnesses,
- ✚ Any Information related to the conciliation and inquiry proceedings
- ✚ Recommendations by the IC and the action taken by the management

Any person who violates the above rule shall be penalized as may be prescribed in applicable statutory rules.

11. Policy Violation:

Violation of the policy guidelines may result in disciplinary action, up to and including termination of services and legal action.

12. Employee obligation and conduct:

All employees are expected to conduct themselves in accordance with this policy. Every employee is hereby called upon to ensure and uphold the dignity, freedom and respect of each individual and support the company's endeavor to ensure this.

13. Revision to the policy:

The management of the company may review or modify this policy. If so required, to make the enforcement of the policy more expedient or to accommodate any changes in the law.

Human Resources

Redressal Mechanism Flowchart:

