

PREVENTION OF SEXUAL HARASSMENT (POSH) POLICY

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DOCUMENT REVISION HISTORY

Version Number	Modified Date	Modified By	Changes	Approval Authority
1.0	01/01/2018	HR Operations	Initial policy with the committee members	Head, HR
1.1	21/08/2018	HR Operations	Change in the committee members	Head, HR
1.2	27/05/2019	HR Operations	Change in the committee members	Head, HR

1. PREVENTION OF SEXUAL HARASSMENT(POSH)

Altran Technologies India is committed to provide a work place that ensures every employee is treated with dignity and respect and afforded equitable treatment. Our company is an equal opportunity company and is committed to creating a healthy working environment that enables employees to work without fear of prejudice, gender bias and sexual harassment. The company will not tolerate any form of sexual harassment and is committed to take all necessary steps to ensure that its employees are not subjected to any form of harassment.

The Supreme Court has also directed companies to lay down guidelines and a forum for redressal of grievances related to sexual harassment.

This policy applies to all categories of employees of the company, including permanent employees, employees on direct contract or third party contract, trainees, employees on contract at its workplace or at client sites and visitors. The company will not tolerate sexual harassment, if engaged in by clients or by suppliers or any other business associates. The workplace includes:

1. All offices or other premises where the company's business is conducted.
2. All company-related activities performed at any other location away from the company premises (e.g. Client place).

Any social, business or other functions where the conduct or comments may have adverse impact on the workplace or workplace relations.

GENERAL GUIDELINES:

A. DEFINITION OF SEXUAL HARASSMENT

1. Unwelcome sexual advances, requests or demand for sexual favors, either explicitly or implicitly, in return for employment, promotion, examination or evaluation of a person towards any company activity;
2. Unwelcome sexual advances involving verbal, non-verbal, or physical conduct such as sexually colored remarks, jokes, letters, phone calls, e-mails, gestures, showing of pornography, lurid stares, physical contact or molestation, stalking, sounds, display of pictures, signs, verbal or non-verbal communication which offends the individuals sensibilities and affect her/his performance;
3. Eve teasing, innuendos and taunts, physical confinement against one's will and likely to intrude upon one's privacy;
4. Act or conduct by a person in authority which creates the environment at workplace hostile or intimidating to a person belonging to the other sex;
5. Conduct of such an act at work place or outside in relation to an Employee of Altran Technologies India or vice versa during the course of employment; and
6. Any unwelcome gesture by an employee having sexual overtones.

B. REDRESSAL PROCESS

1. Any employee who feels and is being sexually harassed directly or indirectly may submit a complaint of the alleged incident to any member of the Committee in writing with his/her signature within 10 days of occurrence of incident.
2. The Committee will maintain a register to endorse the complaint received by it and keep the contents confidential, if it is so desired, except to use the same for discreet investigation.
3. The Committee will hold a meeting with the Complainant within 5 days of the receipt of the complaint, but no later than 7 days in any case.
4. At the first meeting, the Committee members shall hear the Complainant and record her/his allegations. The Complainant can also submit any corroborative material with a documentary proof, oral or written material, etc., to substantiate his / her complaint within 10 days. If the Complainant does not wish to depose personally due to embarrassment of narration of event, a lady officer for lady employees involved and a male officer for male employees, involved shall meet and record the statement.
5. Thereafter, the person against whom complaint is made may be called for a deposition before the Committee and an opportunity will be given to him / her to give an explanation, where after, an "Inquiry" shall be conducted and concluded within 90 days of start of Inquiry.
6. The Committee should provide a complete and detail report of its findings to the employer within 10 days post conclusion of Inquiry.
7. Thereafter, the employer will act upon recommendations of the Committee for appropriate disciplinary action within 60 days post receiving the final report.
8. In the event, the complaint does not fall under the purview of Sexual Harassment or the complaint does not mean an offence of Sexual Harassment, the same would be dropped after recording the reasons thereof.
9. In case the complaint is found to be false, the Complainant shall, if deemed fit, be liable for appropriate disciplinary action by the Management.

C. INTERNAL COMPLAINTS COMMITTEE

A Committee has been constituted by the Management to consider and redress complaints of Sexual Harassment. The Chairman and Members of the Committee are as follows:

Ms. Nupur Nautiyal- Chairman Internal Complaints Committee

Committee Members:

Location	Name	Designation	Email ID	Contact No
Pune	Nupur Nautiyal	Presiding Officer	nupur.nautiyal@altran.com	+91 7349458222
	Nidhi Sharma	Dy. Presiding Officer	nidhi.sharma@altran.com	+91 9880606670
	Harshal Madhukar Sawant	Member	harshal.sawant@altran.com	+91 9845852062
	Nisha Pk	Member	nisha.pk@altran.com	+91 8971505513
	Supriya Mharolkar	External Member		+91 9822043405
Bangalore	Nupur Nautiyal	Presiding Officer	nupur.nautiyal@altran.com	+91 7349458222
	Nidhi Sharma	Dy. Presiding Officer	nidhi.sharma@altran.com	+91 9880606670
	Harshal Madhukar Sawant	Member	harshal.sawant@altran.com	+91 9845852062
	Nisha Pk	Member	nisha.pk@altran.com	+91 8971505513
	Supriya Mharolkar	External Member		+91 9822043405
Chennai	Nupur Nautiyal	Presiding Officer	nupur.nautiyal@altran.com	+91 7349458222
	Kavitha S M	Dy. Presiding Officer	kavitha.s.m@altran.com	+91 9940138265
	Gautam Kumar R M	Member	gautam.kumar@altran.com	+91 9600533933
	Aarthi N	Member	aarthi.n@altran.com	+91 9500901214
	Supriya Mharolkar	External Member		+91 9822043405
Coimbatore	Nupur Nautiyal	Presiding Officer	nupur.nautiyal@altran.com	+91 7349458222
	Kavitha S M	Dy. Presiding Officer	kavitha.s.m@altran.com	+91 9940138265
	Senthil Ramesh MA	Member	senthilramesh.m.a@altran.com	+91 9500991347
	Aarthi N	Member	aarthi.n@altran.com	+91 9500901214
	Supriya Mharolkar	External Member		+91 9822043405
Noida	Nupur Nautiyal	Presiding Officer	nupur.nautiyal@altran.com	+91 7349458222
	Nidhi Sharma	Dy. Presiding Officer	nidhi.sharma@altran.com	+91 9880606670
	Ravikant Upadhyay	Member	ravikant.upadhyay@altran.com	+91 9643426951
	Nisha Pk	Member	nisha.pk@altran.com	+91 8971505513
	Supriya Mharolkar	External Member		+91 9822043405

A quorum of atleast 3 members is required to be present for the proceedings to take place. The quorum shall include the HR Director and at least two members, one of whom shall be a lady.

There shall be regular orientation programs for committee members and they should mandatorily meet once every quarter.

D. INQUIRY PROCESS

1. The Committee shall immediately proceed with the Inquiry and communicate the same to the Complainant and person against whom complaint is made.
2. The Committee shall prepare and hand over the Statement of Allegation to the person against whom complaint is made and give him/her an opportunity to submit a written explanation if she/he so desires within 10 days of receipt of the same.
3. The Complainant shall be provided with a copy of the written explanation submitted by the person against whom complaint is made.
4. If the Complainant or the person against whom complaint is made desires any witness/es to be called, they shall communicate in writing to the Committee the names of witness/es that they propose to call.
5. If the Complainant desires to tender any documents by way of evidence before the Committee, she/he shall supply original copies of such documents. Similarly, if the person against whom complaint is made desires to tender any documents in evidence before the Committee he/she shall supply original copies of such documents. Both shall affix his/her signature on the respective documents to certify these to be original copies.
6. The Committee shall call upon all witnesses mentioned by both the parties.
7. The Committee shall provide every reasonable opportunity to the Complainant and to the person against whom complaint is made, for putting forward and defending their respective case.
8. The Committee shall complete the "Inquiry" within reasonable period but not beyond three months and communicate its findings and its recommendations for action to the Employer. The report of the committee shall be treated as an inquiry report on the basis of which an erring employee can be awarded appropriate punishment straightaway.
9. The Employer will direct appropriate action in accordance with the recommendation proposed by the Committee.
10. The Committee shall be governed by such rules as may be framed by the Supreme Court orders or any other legislation enacted later on.

E. OTHER POINTS TO BE CONSIDERED

1. The Committee may recommend to the Employer action which may include transfer, termination or any other appropriate disciplinary actions.
2. The management shall provide all necessary assistance for the purpose of ensuring full, effective and speedy implementation of this policy.
3. Where sexual harassment occurs as a result of an act or omission by any third party or outsider, Altran Technologies India shall take all steps necessary and reasonable to assist the affected person in terms of support and preventive action.
4. The Committee shall analyze and put up report on all complaints of this nature at the end of the year for submission to Employer/ Management and the Commissioner.

In case the Committee finds the degree of offence coverable under the Indian Penal Code, then this fact shall be mentioned in its report and appropriate action shall be initiated by the Employer/Management, for making a Police Complaint.

F. CONFIDENTIALITY

Altran Technologies India understands that it is difficult for the victim to come forward with a complaint of sexual harassment and recognizes the victim's interest in keeping the matter confidential.

To protect the interests of the victim, the accused person and others who may report incidents of sexual harassment, confidentiality will be maintained throughout any investigatory process to the extent practicable and appropriate under the circumstances.

G. ACCESS TO REPORTS AND DOCUMENTS

All records of complaints, including contents of meetings, results of investigations and other relevant material will be kept confidential by the company except where disclosure is required under disciplinary or other remedial processes.

H. PROTECTION TO COMPLAINT/ VICTIM

The company is committed to ensure that no employee who brings forward a harassment concern is subjected to any form of reprisal. Any reprisal will be subjected to disciplinary action. The victim will be given at most moral support, confidence and cooperation from the employer/management.

2. DISCLAIMER

This policy and its contents are confidential and intended solely for the use by employees of Altran Technologies India Pvt. Ltd. Transmitting, Disclosing, Copying, distributing these content to other than the intended recipient / users is strictly prohibited. It is the sole discretion of the Management to change, amend the entire policy and/or its clause/s from time to time and/or withdraw the same, without any notice. This policy supersedes all earlier versions if any.

The Company reserves the right to review the structure, entitlements, process & policy of Compensation from time to time as it deems fit. Introduction of any taxes or enhancement of existing ones resulting in any liability to the Company shall be borne by the Employees.