

***Effective from 1<sup>st</sup> February, 2016***

Parkar is committed to maintain a safe and harassment free environment at the workplace. A comprehensive guideline on the code of conduct is employed by Parker through its "Prevention of Workplace Harassment Policy". This Policy constitutes different forms of harassment and the role of every Parkar employee in preventing, surfacing and addressing these behaviors through Workplace Issues Committee. The Policy also contains the methodology to approach consensual relationships at workplace.

**Itineraries:**

- Extent and Commencement of the Policy
- Definitions
- Response to Inappropriate Conduct or Possible Incidents of Harassment
- Consensual Relationship Guidelines
- Amendment or Termination
- Appendix A: Infractions of Standards of Conduct
- Appendix B
- Confidentiality
- Annual Report

**Extent and Commencement of the Policy**

- a) This Policy extends to all personnel in all legal entities of Parkar in India (hereafter referred as Parkar India).
- b) This Policy shall form part of the terms and conditions of employment of all personnel and shall be deemed to be incorporated therein.
- c) This Policy will apply in conjunction with the latest state and central government legislations in India.
- d) It will come into effect from immediately and will remain in force subject to future amendment(s), which may be made in this Policy in order to maintain compliance with the applicable law.

**Definitions**

**a) Personnel:**

I) A person employed with Parkar India for any work on regular, temporary, ad hoc or daily wages, either directly or through an agent, including a contractor, with or, without the knowledge of principal employer (Parkar India), whether for remuneration or not, or working on a voluntary basis or otherwise, whether the terms of employment are expressed or implied.

II) Personnel for the purpose of this Policy would include but not be limited to any co-worker, contract worker, client, customer, vendor, visitor, probationer, trainee, apprentice or intern.

**b) Workplace:**

I. Any job site of ParkarIndia

II. Any place visited by the Personnel of ParkarIndia, arising out of or during the course of employment such as business related travel, company sponsored team outings, team offsite meetings etc., including transportation provided by ParkarIndia for undertaking such journey.

**c) Harassment:**

I) Unwelcoming conduct including but not limited to discrimination of any kind based on race, religion, creed, color, national origin, citizenship, marital status, sex, age, sexual orientation, gender identity, political ideology, ancestry, or the presence of any physical, sensory, or mental disabilities, or other legally protected status. Please refer to Appendix 'A' for list of Infractions of Standards of Conduct.

II) Sexual Harassment generally consists of unwelcome sexual advances, requests for sexual favors, or other verbal, non- verbal or physical conduct of a sexual nature

- When such conduct has the purpose or effect of creating a sexually offensive, hostile, or intimidating work environment that interferes with an individual's ability to perform the job.
- If submission to or rejection of such conduct is the basis for employment decisions like promotion, recruitment, transfer, appraisal etc. regarding a Personnel

For the purposes of this Policy, sexual harassment will include within its scope 'same sex or either sexharassment'

Sexual harassment may be overt or subtle. It may be intentional or unintentional.

Behavior that may be acceptable in a social setting may not be appropriate in the workplace.

Examples of sexual harassment include, but are not limited to:

- Requests or demands of sexual favors in exchange for favorable or preferential treatment;
- Sexual jokes or use of sexually explicit language or sexually colored remarks or sexual innuendos;
- Unwelcome or unwanted physical contact or advances;
- Sexually degrading words used to describe an individual;
- Sexual comments injected into business communications;
- The communication of sexually offensive material via electronic mail or voice mail;
- Graphic ,verbal or suggestive comments about an individual's body, personal belongings, attire;
- Physical or verbal abuse of a sexual nature;
- Unwelcome sexual flirtations, advances, or propositions; and
- Downloading, circulating, or displaying sexually suggestive objects and/or pornographic pictures, or material from the Internet or any other source in the work place;
- Posting of sexually harassing, sexually colored, derogatory or offensive remarks, pictures etc. on social media targeting other personnel
- Sexually colored gestures

Explanation: It is clarified that the reasonable perception of the victim would be relevant in determining whether any conduct was sexually colored and, if so, whether such conduct was unwelcome or not.

**d) Supervisory authority:**

Any Personnel's Manager or any of their Manager's next level Manager in the management chain shall be deemed to have Supervisory Authority over those Personnel for the purpose of this Policy.

**e) Conflict of Interest:**

I) Personnel are expected to use their best judgment to act, at all times and in all ways, in the best interests of ParkarIndia. A "conflict of interest" exists when the personal interest of a Personnel interferes with the interests of ParkarIndia.

II) A conflict of interest may also arise from a Personnel's personal relationship with another Personnel, if such relationship impairs either Personnel's objective business judgment. A conflict of interest situation could also be contextual.

**f) Position of Influence:**

Personnel who are in such a position at ParkarIndia as to exercise influence over other Personnel either by virtue of the working contextual relationships or by virtue of their position such as reporting requirements or evaluation of other Personnel including any of the following positions of management such as L1/L2 Manager any other managerial position in the Management chain of another Personnel, Quality Improvement Manager, Human Resources Manager/Generalist/Assistant, Recruiter, Team Lead, Quality lead, Safety Manager, Security Manager and Finance Manager. It is also not possible to exhaustively list out

the “Positions of Influence” and the foregoing are examples of situations where “Positions of Influence” arise. Please consult your HR Business Partner or Legal Department immediately in case of doubt on whether a position is a Position of Influence with respect to another position with regards to a consensual relationship between two parties.

**g) Group Governing Council:**

As used in this Policy, the Group Governing Council (GGC) will consist of the HR Head and Senior Delivery Manager of Parkar India, and any such member as may be included from time to time. .

**Response to Inappropriate Conduct or Possible Incidents of Harassment**

**a) Personnel Responsibility**

I. All Personnel of ParkarIndia, regardless of position, are responsible for ensuring that the workplace is free from offensive behavior and harassment and are not party to any such event.

II. Personnel who observe or experience a workplace harassment incident, should immediately tell the harasser that their behavior is unwelcome and request that it be stopped.

III. In addition, Personnel who encounter such behavior are required to report it immediately and confidentially to Harassment Redressal Committee by sending an email to [speakup@parkar.consulting](mailto:speakup@parkar.consulting) or call +91 9168620528. Please refer to Appendix 'B' for Confidential Complaint Format

IV. If the complaint pertains to conduct by someone in the Human Resources Department, or if the Personnel does not wish to file the complaint with Harassment Redressal Committee (HRC) for some reason, the Personnel can send the complaint directly to [ethics@parkar.consulting](mailto:ethics@parkar.consulting) .

**b) Parkar India Responsibility**

I. Parkar India will promptly investigate all reports of workplace harassment or inappropriate conduct and will enforce appropriate disciplinary action where necessary.

II. Harassment Redressal Committee (HRC): In order to address all workplace harassment issues, HRC committee is constituted, comprising of 3 members from Parkar India. The office of this committee will project manage the responsibilities of workplace issues. 'The office of this committee will be appointed by the HR Head and comprise (HR BP, 2 employees and 1 external member) will provide necessary administrative support to this committee. Below will be the key responsibilities of this committee.

- Assess the nature of the complaint and accordingly appoint and delegate the investigation to 'Other Complaints - Internal Investigation Committee' ('OC-IIC') or the 'Sexual Harassment - Internal Investigation Committee' ('SH-IIC'), as the case may be, or redirect the complaint to HRBP or Manager for further disposal if the nature of the issue is not within the scope of this committee or does not require further investigation.
- Ensure that complaints are treated in a fair, sensitive, expeditious and confidential manner.
- Provide consultation to the IIC during the course of investigation, review their recommendations and send the report to the Group Governing Council (GGC) for their approval. Promptly communicate the approved necessary punitive/corrective action to be the HRBPs and ensure implementation of the same.
- Periodically review the cases that come up to assess trends and nature of offenses and make appropriate recommendation(s) to prevent recurrence.

iii. Punitive/Corrective action: Punitive/Corrective action may include but is not limited to actions such as a warning, reprimand, reassignment, payment of sums to the aggrieved Personnel as appropriate if the case warrants, withholding of any pay rise or increments, withholding of promotion or termination of employment.

- iv. **Non- Retaliation:** ParkarIndia will provide a safe and secure environment for all Personnel to voice their discomfort or displeasure against any harassment they have experienced or observed. The complainant will not face any retaliatory action by ParkarIndia or by any supervisory authority. If any Personnel believe that they have been retaliated against for making a good faith complaint of harassment or discrimination, they should report this immediately to their supervisor, department manager or to a Human Resources Business Partner.
- v. **False or malicious complaints and false evidence:** In cases where it is found that the complaint was malicious or false or any of the parties has produced any forged or misleading document, then the complaint may be treated as misconduct and necessary disciplinary action will be initiated against the complainant.
- vi. **Confidentiality:** To the extent possible, the complainant's privacy, and that of any witnesses, as well as of the alleged harasser, will be protected against disclosure, except as necessary to conduct the investigation.
- vii. ParkarIndia will provide assistance to the aggrieved Personnel if he/she so chooses to file a complaint in relation to the offense under the Indian Penal Code or any other applicable law.
- viii. ParkarIndia undertakes to create awareness about this Policy at regular intervals for all ParkarIndia Personnel. Workshops and orientation programs will be conducted for committee members at regular intervals apprising them about the latest laws and internal policies, responsibilities of committee members and process of conducting investigation

**Consensual Relationship Guidelines**

In case of mutually agreeable, consensual or romantic relationships between any two Personnel:

- a) Solicitation of interest in such a relationship must never be in a manner that is unwelcome, unwanted by the recipient of the solicitation on account of reasons that include, but are not limited to, being persistent after denial, soliciting in an unwelcome and/or disrespectful way to the other party, as that is not acceptable behavior at Parkar India. Also, it should not take form of sexual harassment as defined above.
- b) If one party has supervisory authority over the other or is in the upward management chain of another Personnel or holds any position of Influence, an actual or perceived conflict of interest may exist on account of the consensual relationship between the parties. Therefore, relationships in these circumstances must be avoided.
- c) If such relationships arise, the situation must be reported, by either of the parties or any Personnel who is aware of the relationship between two such parties. In case one of the parties holds a position of influence, he/she must notify his/her supervisor and human resources department about such a relationship immediately, who will ensure that appropriate arrangements are put in place to avoid any conflict of interest. Such arrangements may include a change in the responsibilities of the individuals involved, re-assignment or transfer of teams within ParkarIndia, or other actions including up to termination of employment.
- d) Any recommended actions pertaining to the individuals in a consensual relationship involving 'Positions of Influence' must be approved by the following: **Group Governing Council**

**Amendment or Termination**

ParkarIndia may at any time, at its sole discretion, alter, amend, withdraw or delete any or all of the provisions mentioned above. Any amendment of the above Policy shall be intimated to the Personnel via email, intranet, posting a notice on the notice board of ParkarIndia or in any other manner as may be deemed fit by ParkarIndia

**Appendix A: Infractions of Standards of Conduct**

The Standards of Conduct are a list of examples of infractions that may result in corrective action, up to and including termination of employment. The Standards of Conduct are only guidelines; it is not possible to list all the forms of behavior that are considered unacceptable in the workplace, and the Standards of Conduct is not intended to be all-inclusive or exhaustive.

Parkar India reserves the right to take all necessary and reasonable steps to prevent and ensure that no Personnel employed, an associate, or a legitimate visitor to the establishment is subject to any workplace harassment (of any nature) by any party during the course of employment/visit. Where any such harassment occurs, Parkar India shall take all necessary steps to assist the aggrieved Personnel/ party to redress the act of harassment.

Parkar India reserves the right, as appropriate, to apply any level of corrective action as appropriate, up to and including immediate termination of employment, without prior corrective action or notice for conduct in either category or for conduct not described in the Standards of Conduct. Employment with Parkar India is governed by the employment contract signed and agreed by the parties, and either party may terminate that relationship at any time, in line with the provisions of the employment contract.

### **Category 1:**

The following work conduct infractions are regarded as extremely serious, and termination of employment may result following any one offence:

- Disrespect or rudeness to any Personnel;
- Theft or inappropriate removal or possession of property;
- Assaulting, threatening, intimidating, coercing, or interfering with managers or fellow Personnel;
- Making unauthorized statements about ParkarIndia to the press or in any public forum (as only ParkarIndia's authorized spokespersons may make authorized statements);
- Use or possession of dangerous or unauthorized materials such as hazardous chemicals or explosives, or use or possession of firearms, knives, explosive devices of any kind, or weapons of any kind;
- Violation of the ParkarIndia's Health and Safety policy including possession, distribution, sale, transfer, or use of alcohol or illegal drugs in the workplace, while on duty or on breaks, or while operating employer-owned or leased vehicles or equipment;
- Fighting or threatening violence in the workplace;
- Gross misconduct;
- Gross negligence;
- Sexual or other unlawful or unwelcome harassment.
- Making, publishing, or repeating false, vicious, or malicious statements concerning a Personnel, business associate, ParkarIndia, or its products;
- Using social media for defamation or harassment, for e.g. posting, liking, commenting derogatory or offensive comments, photographs etc. on the Internet about any personnel or the company;
- Discriminating against a fellow associate or prospective associate on the basis of race, religion, creed, color, national origin, citizenship, marital status, sex, age, sexual orientation, gender identity, senior citizen status, political ideology, ancestry, or the presence of any physical, sensory, or mental disabilities or other legally protected status;
- Negligence or improper conduct leading to damage of employer-owned, employer-leased, or customer-owned property;
- Insubordination or other disrespectful conduct;
- Falsification of Personnel or other ParkarIndia documents/records, including employment application;
- Unauthorized removal of ParkarIndia documents;
- Unauthorized disclosure of business "secrets" or confidential information;
- Intentionally making entries on another associate's time card/sheet/leave record/attendance records, or falsely altering a timekeeping document;
- Unauthorized absence from work or ParkarIndia premises (job abandonment) for the third consecutive time subsequent to issuance of formal warnings for the first two times, which remain unheeded;
- Failure to fully cooperate with ParkarIndia's investigations;
- Violation of safety policies, procedures, standards, regulations or laws;

- Creating a hazardous or dangerous situation;
- Engaging in any conduct that places the health and safety of any person at risk;
- Violation of Personnel policies; or
- Failure to address behavior after corrective action has been applied.

**Category 2:**

The following work conduct infractions are considered serious and generally result in warning and corrective action. A repeat of these infractions may lead to termination.

- Failure to carry out a work assignment in an efficient, responsible, and acceptable manner;
- Abusive, profane, or insulting language to a supervisor, fellow associate, or vendor;
- Failure to adhere to starting time, quitting time, or break time policies, or wasting time;
- Unauthorized use, misuse, or abuse of equipment, products, material, or property belonging to other employees, belonging to Parkar India, or in Parkar India's custody;
- Leaving an Parkar India -assigned work area during scheduled working hours without permission;
- Unauthorized solicitations or collections for any purpose whatsoever on Parkar India's premises;
- Unauthorized distribution of literature at any time on Parkar India's premises;
- Unauthorized posting or removing of notices or signs, or writing of any form on Parkar India property;
- Creating or contributing to disorderly or unsanitary conditions;
- Failing to report or remedy any unsafe conditions, procedures, or behaviors;
- Failure to immediately report an accident/injury, regardless of severity, when it occurs on Parkar India property, or while performing Parkar India business.

**Appendix B –**

**Note to Complainant:** Parkar India is committed to providing its Personnel with a work environment that is free of discrimination and harassment. Parkar India takes all complaints very seriously and anyone found to have engaged in such conduct will be subject to discipline, including termination of employment. Parkar India does not tolerate any retaliation against anyone for filing a complaint or participating in an investigation into such conduct.

Please provide us with as much factual detail as you can, so that we can conduct a thorough investigation. It is also important that you cooperate fully with the person(s) designated to investigate your complaint. Parkar India will undertake reasonable efforts to handle the investigation of your complaint in a confidential manner.

This details should be emailed to [speakup@parkar.consulting](mailto:speakup@parkar.consulting) if the complaint concerns conduct by someone in the Human Resources Department, or you do not wish to file the complaint with that department for some reason, you can send this complaint directly to [ethics@parkar.consulting](mailto:ethics@parkar.consulting).

Please provide following details in your email.

Employee Name and ID  
Department/Position  
Phone Number

Specific details of any incidents or actions taken against you that you believe constitute discrimination or harassment, along with dates of when these occurred.

Describe how this affected you from the perspective of your job.

Are you aware of any documents that may help support your concerns? If so, please describe them in detail and attach them in your email if possible.

Have you discussed your concerns with anyone at Parkar India? If so, please provide their name and contact

information.

Please list any witnesses or individuals who may have information relevant to this investigation.

### **CONFIDENTIALITY**

Parkar India acknowledges the sensitivity of complaints and will take steps to ensure that all matters including any complaints made and investigations conducted, under this policy are handled in the strictest of confidence and sensitivity as confidential to the extent possible or practical under the circumstances. However, such information may be disseminated regarding the justice secured to any victim of Sexual Harassment under the Act without disclosing the name, address, identity or any other particulars calculated to lead to the identification of the Complainant and the witness/es. Every employee involved in the operation of this Policy, whether making a complaint or involved in any investigation, shall be required to observe high level of confidentiality that is required. Breach of confidentiality may give rise to disciplinary action.

### **ANNUAL REPORT**

The Committee shall prepare an annual report at the end of the financial year of Parkar India. It is the responsibility of the Presiding Officer/Chair Person to ensure a full account of the committee's activities during the previous year is recorded and forward a copy thereof, to the Managing Director who shall direct the HR department to forward the same to the Ministry of HRD/ District Officer of LCC.

**Version Control**

<b>Date</b>	<b>Prepared by</b>	<b>Reviewed by</b>	<b>Action</b>
1 <sup>st</sup> March, 2016	Kiran Satpute	Gaurav Singh	Created Policy