

**Policy Eligibility:** All employees of TrusTrace including contract, Interns & probationary employees.

**Effective from:** January 01, 2022

**Purpose:**

TrusTrace as an organization is committed to provide a healthy environment to all employees and thus would not tolerate any discrimination and/or harassment in any form. The Policy is meant to provide few guidelines for employees and empowers TrusTrace to take effective measures to avoid & to eliminate & if necessary to impose punishment for any harassment by:

- Employees,
- Supervisors or Managers,
- Customers or Visitors on its premises.

**Policy & Guidelines**

Every country has norms / legislations/ ruling/guidelines forbidding harassment and sexual harassment of employees by managers, supervisors, and other employees.

Harassment - defined as any behavior that is offensive, derogatory, or intimidating to an individual employee or to certain groups of employees.

Sexual Harassment shall mean and include, but is not limited to the following:

- When submission to unwelcome sexual advances, requests for sexual favors, and verbal or physical conduct of a sexual nature are made, either explicitly or implicitly.
- When unwelcome sexual advances and verbal, non-verbal, or physical conduct such as loaded comments, remarks or jokes, letters, phone calls or e-mail, gestures, showing of pornography, lurid stares, physical contact or molestation, stalking, sounds or display of a derogatory nature, have the purpose or effect of interfering with an individual's performance or of creating an intimidating, hostile or offensive company environment
- When any form of sexual assault is committed where a person uses, the body or any part of it or any object as an extension of the body in relation to another person without the latter's consent or against that person's will.
- When any such conduct as defined above is committed by a third party or outsider in relation to an employee of the Company, or vice versa on the premises of the Company.

**Process:**

A committee to govern and regulate the behavior of the TrusTrace employees has been created called the Sexual Harassment (Protection) Committee. This Committee is empowered to investigate disclosures pertaining to sexual harassment or harassment. The Committee is chaired by a woman and comprises of equal number of men and women; where one-woman member belongs to a NGO or a Legal consultant person who has sufficient knowledge and experience in related matters. The members of this Committee would be nominated by TrusTrace and would be communicated as and when there is a change in the constitution of the same.

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Members of the Sexual Harassment (Protection) Committee with effect from **February 01, 2022.**

Presiding Officer	: Ms.Anja Sadock (Head of Marketing )
Internal Committee	: Ms.Jenny Wörn ( Head of Implementation) Ms. Kiruthiga (Architect – Engineering) Mr. Ramanathan Venkataraman (Vice President – Engineering) Mr. Vyas Ramaraj (Head of HR)
Legal Consultant	: Mr.Nithin Wadhwa from (Wadhwa Law Offices)
Convener	: Ms.Deepthi Kumar Sugumar

To indicate an incident mounting to sexual harassment request you to follow the following process.

- Complainant to initiate a 'secured disclosure' through greytHR – Helpdesk. Access to this is only with one of the committee members.
- The disclosure will be communicated to the Sexual Harassment (Protection) Committee through email.
- Within a period of 5 working days from the date of such communication, the Chairperson will convene a meeting of the Committee
- The committee will examine the disclosure and undertake investigation of the same.
- The committee after completion of investigation will submit its report to Mr. Saravanan Parisutham - COO & Co-Founder(saravanan.p@trustrace.com) for further necessary action in the matter.

Subsequent to the reporting of any Secured Disclosure, if the complainant perceives that he is being subject to any victimization by virtue of his disclosure can bring to the notice of either of the following people for investigation and appropriate remedial action:

- CEO & Co-Founder : Mr.Shameek Ghosh (shameek.ghosh@trustrace.com)
- CSO & Co-Founder : Mr.Hrishikesh Rajan (hrishi.rajan@trustrace.com)
- CTO & Co-Founder : Mr.Madhava Venkatesh (madhava.venkatesh@trustrace.com)

TruTrace's culture conforms to non-vindictive environment. TruTrace guarantees every employee that he would not be jeopardized only for reporting any Secured Disclosure under this policy.

While the Policy is intended to provide protection to any employees who makes a Secured Disclosure, it is critical to note that any frivolous and / or mala-fide disclosures made knowingly, would be subject to appropriate disciplinary action.

**Clauses not covered above:**

- The provisions of this policy shall not restrict the power of company or complainant to proceed against the alleged offender for any other misconduct or to pursue the criminal or civil remedies.
- The proceedings under this policy shall not be stalled or postponed merely because the complainant is proceeding against the accused under any other provision of civil or criminal law.