

## PREVENTION OF SEXUAL HARASSMENT POLICY

### PERSPECTIVE

eInfochips is committed to providing a work environment that is professional and mature, free from animosity and one that reinforces our value of integrity that includes respect for the individual.

### OUR POLICY

- eInfochips (eI) is an equal opportunity employer.
- All employees are expected to create and maintain a work environment that is respectful of all persons in it.
- We are committed to provide a workplace that is free of sexual harassment and where all employees are treated with dignity.
- Any employee can complain about sexual harassment as per the guidelines laid down in this policy. All complaints will be treated fairly, seriously, with speed and empathy and in confidence.

### OBJECTIVE

**The objective of this policy is:**

- To define Sexual Harassment
- To provide for an effective complaint redressal mechanism if there is an occurrence of sexual harassment

### APPLICABILITY

Applicable to all the employees of eInfochips who are directly or indirectly associated with the organisation, irrespective of their level, across all offices.

### DEFINITIONS

**Employee** - For the purpose of this policy, the term "employee" means any person on the rolls of eInfochips; and this would also include persons who are temporary or part time or honorary employees, by whatever name called and would include persons engaged on a casual basis or for project based assignments and/or persons who are engaged through any third-party service providers. This broad definition of 'Employee' used for the purpose of this policy cannot be used to claim rights of an employee conferred by any other law of the land.

**"Sexual Harassment"** – The definition of "Sexual Harassment" shall include but not be restricted to the following.

Sexual Harassment is such unwelcome sexually motivated behavior (whether directly or by implication) as:

- Physical contact and advances
- A demand or request for sexual favours
- Sexually coloured remarks
- Showing pornography, writing sexually loaded letters/emails/SMSs/MMSs
- Verbal or written sexually suggestive or obscene comments, jokes, or propositions
- Unwanted physical contact, such as touching, grabbing, or pinching
- Continual expression of sexual or social interest after an indication that such interest is not desired
- Conduct with sexual implications when such conduct interferes with the employee's work performance or creates an intimidating work environment
- Suggesting or implying that failure to accept a request for a date or sex would adversely affect the employee in respect to employment, promotion, retention, and compensation or performance evaluation and/or any other unwelcome physical, verbal or non-verbal conduct of sexual nature
- Where the victim has reasonable grounds to believe that his/her objection to such unwelcome behaviour would disadvantage him/her in connection with his/her work including recruitment/employment or allotment of work, promotion or evaluation of his/her engagement in any Company activity.
- Where any such act(s) create an intimidating/hostile/offensive work environment and/or affect the person's work performance.
- Where any other adverse or hostile consequences might occur if the victim does not consent to the conduct in question or raise any objection thereto.

**“Complaints Committee” - A Committee formed under this policy to investigate complaints of sexual harassment referred to it and make appropriate recommendations to the relevant management team.**

“Management Team” - A Management team refers to the person/s vested with the powers to take appropriate disciplinary action. Details given below in each case.

#### **HARASSMENT BY NON-EMPLOYEES**

We will endeavor to protect employees, to the extent possible, from reported harassment by non-employees such as from visitors, vendors and other parties who have workplace contact with our employees.

#### **INTERNAL COMPLAINTS COMMITTEE**

Complaints Committee - This committee will receive and investigate into complaints related to sexual harassment and submit its’ recommendations to the Management Team. This is a forum of at least 4 persons that will investigate complaints of alleged sexual harassment.

Constitution of the sexual harassment complaints committee - A woman shall head the Complaints Committee. Further, to prevent the possibility of any undue pressure or influence from any quarter, Complaints Committee may want to involve a third party, any external member who is well respected in the community and is knowledgeable on the subject of sexual harassment.

The names of the committee members will be mailed or any other visible and accessible medium of communication such as notice boards etc.

Current committee members are as below:

| KB   | NP             | MP             | AP             | Parishram      | Pune-A          | Pune-B        | NOIDA           | Bengaluru     | US-Bay Area & other offices |
|--|----------------|----------------|----------------|----------------|-----------------|---------------|-----------------|---------------|-----------------------------|
| Girish Gopalani  | Parth Vasavada | Aarohi Keswani | Kina Pandya    | Aarohi Keswani | Monika Kojima   | Samir Patil   | Sneha Jaiswal   | Sneha Jaiswal | Sarita Khot                 |
| Shweta Mishra  | Ami Vyas       | Dimpal Patel   | Bijal Chudgar  |                | Swati Popli     | Deepali Shah  | Meetu Sharma    | Bhumi Kansara | Avani Patel                 |
| Bhavin Patel   | Manish B Patel | Ravi Vagadia   | Harshal Chhaya |                | Vishwas Gokhale | Archana Benur | Rajendra Pratap | Rahul Arya    | Sribash Dey                 |
| Chinmayee Joshi ( <a href="mailto:chinmayee_joshi@yahoo.com">chinmayee_joshi@yahoo.com</a> ) |                |                |                |                |                 |               |                 |               |                             |
| Aparna Gunjekar  |                |                |                |                |                 |               |                 |               |                             |
| Saurabh Desai  |                |                |                |                |                 |               |                 |               |                             |
| Sumit Sethi  |                |                |                |                |                 |               |                 |               |                             |
| Abhishek Binaykia  |                |                |                |                |                 |               |                 |               |                             |

They can be reached at mail id [complaintscommittee@einfochips.com](mailto:complaintscommittee@einfochips.com)

#### **MANAGEMENT TEAM**

A Management team refers to the person/s vested with the powers to take appropriate disciplinary action. Management team will consist of

- CEO
- COO

#### **COMPLAINT PROCEDURE**

Every employee who feels that he or she has been harassed is strongly urged to immediately bring the subject to the attention of the committee in writing. The committee will investigate inquiries and/or complaints as quickly as possible. Any investigation will be conducted in as confidential manner as is compatible with a thorough investigation of the complaint.

## COMPLAINT MECHANISM

- Any employee may lodge a complaint of sexual harassment against any other employee to the chairperson or to any member of the Complaints Committee.
- All complaints will have to be sent in writing and will be dealt with in strict confidence by the committee members.
- The complaints should be sent at the earliest, but preferably within 15 days from the date of occurrence of the alleged incident.
- The chairperson of the committee shall, within 7 working days of the receipt of such a complaint, personally meet or designate a member of the complaints committee to meet the employee who has made the complaint and record the statements made at such meeting. During this meeting the employee is also expected to present any corroborative material/evidence to substantiate the complaint.
- After the meeting with the complainant, and on satisfaction of the existence of a prima facie case of Sexual Harassment, the chairperson shall call for a committee meeting within the next 7 working days.
- During this meeting of the Complaints Committee, the person accused of the harassment will be called. The Complaints Committee will communicate the complaint to the person accused where he/she will be given an opportunity to give his/her views of the situation.
- After having heard both the parties, the Complaints Committee shall thoroughly investigate (meet the complainant, enquire into evidence provided, meet the witnesses, consult with experts etc.) the complaint and make a report of its findings within the next two weeks. This report will be submitted to the Management Team.
- In case the complaint of sexual harassment is proven to be true, the accused person will be subject to strict disciplinary action, up to and including termination of employment.
- In case the complaint registered is found to be frivolous or false or was made with a mischievous intention, the complainant will be liable to face strict disciplinary action up to and including termination of employment.
- Any employee who is a part of the investigations shall not be victimised or subject to any unfavourable treatment.
- The victims of sexual harassment will have the option to seek his/her own transfer.
- Nothing in these guidelines should be taken in any way as a limitation on the powers of the Management Team to decide what disciplinary action(s) is appropriate under given circumstances.

## APPEAL PROCEDURE

If the victim of sexual harassment feels unsatisfied with the outcome of his/her complaint by the Complaints Committee, he/she may appeal to the Management Team. The decision of the Management Team will be final and binding on all parties concerned.

## CRIMINAL PROCEEDINGS

Where such conduct amounts to a specific offence under the Indian Penal Code or under any other law, it shall support the victim in initiating appropriate action in accordance with law.

## EMPLOYEE EDUCATION

- All employees will be made aware of this policy by circulating this policy and ensuring that they have read the same by getting their signoff.
- A copy of this policy will be given to all new employees on joining.
- This policy will also be uploaded on HRMS for ready reference of all employees.

## IMPLEMENTATION

This policy will be implemented across the Company with immediate effect.

**MY COMMITMENT**

I, Mr. /Ms. \_\_\_\_\_, as a member of the elnfochips Ltd, have read and understood the Company’s Policy to Address Sexual Harassment. I hereby commit to abide by this document in letter and spirit, a copy of which has been made available to me.

\_\_\_\_\_  
**Name**

\_\_\_\_\_  
**Signature**

\_\_\_\_\_  
**Place**

\_\_\_\_\_  
**Date**

***Note: Each employee is requested to complete this and hand it over duly signed to the HR department (to be retained in the employee file)***