

POSH Policy

Version 15.0

Table of Contents

1. Objective
2. Applicability
3. Definition of workplace
4. What is Sexual Harassment?
5. Associate's Responsibility
6. Birlasoft Council on Workplace Harassment
7. Procedure to register complaint against a Sexual Harassment
8. Enquiry by the Internal Committee
9. False Accusations
10. Confidentiality
11. List of Internal Committee Members

1. Objective

Birlasoft is committed to provide an environment which is secure, safe and free of unlawful discrimination at workplace to all associates. Birlasoft has created this policy to strengthen its core values of Respect and Integrity, to provide a conducive environment free from prejudice, gender bias and sexual harassment at workplace. To have secure and safe workplace, it is essential that Associate/s deals with their colleagues and third parties with full fairness and respect and realizes that his/her behaviour will be attributed to Birlasoft and can affect its reputation.

This document establishes the guidelines and processes as defined under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013.

2. Applicability

This policy is applicable to all Associates of Birlasoft Ltd. "Associate" includes all full-time / contractual employees, trainees and ancillary staff. It also includes any person who is associated with Birlasoft for business and operates from its premises. Any complaint of sexual harassment at workplace reported by an associate by himself/herself or by any other associate on behalf of an aggrieved person or victim will be actioned under this policy. Any workplace sexual harassment, as defined below involving any of the Associate shall be subject to this Policy and respective procedures, irrespective of the time and place of it's happening.

3. Definition of workplace

For the purposes of this policy, the word 'workplace' is not confined or limited to the actual working place of the associates or office premises, in which paid work may be performed as per the prescribed duty hours. Workplace would also include inter office parties, work-related social functions, phone calls, sending messages through cellular phones or email to another associate from anywhere, or other work-related contacts outside office hours, or virtual / direct interactions during work from home or hybrid work scenario and work-related interactions even on non-working days. Thus, it is not the physical workplace that would govern, but the access that a perpetrator has to the recipient of workplace/sexually harassing behaviour by virtue of a job situation or relation that is related to the job or work assignment.

4. What is Sexual Harassment?

Sexual harassment is any unwanted or undesirable conduct that puts down or shows hostility or an aversion towards another associate at the workplace. It is an act done by any associate at the workplace with the intention to make any Associate, especially a female associate, uncomfortable or with the purpose of violating a person's dignity/modesty or creating an intimidating, hostile, degrading, humiliating or threatening work environment.

Some of the acts and example of Sexual Harassment are given below:

- Making obscene or dirty comments and remarks with sexual orientation, which object the other person.
- Inappropriate usage of e-mail or any such communication or chat facilities for sending & receiving obscene messages/pictures.
- Sexual advances & gestures whether by words, gesture or actions, including talking about sexual activities or desires
- Sending of pornographic materials in any form to an Associate
- Displaying or giving Nude or semi-nude photographs, cartoons or electronic images on phones, laptops, notebooks, etc.
- Sexual graffiti in office premises, including in rest rooms
- Leering, elevator eyes, winking

- Whistling, barking, grunts, growling with the intent to intimidate / harass
- Passing rumours of sexual acts or involvement
- Stroking, grabbing, patting, hugging, pinching, and provocatively posing
- Intentionally cornering or blocking passageway
- Clothing adjustments of others, backrubs
- Stalking, pestering, spying or obsessive behaviour
- Inappropriate calendars or screen savers
- Unequal treatment based on gender
- Unwelcome sexual advances or threats
- The offer of rewards for going along with sexual advances e.g. promise of promotion, access to training, onsite opportunities, favourable projects, etc.
- Threats for rejecting sexual advances e.g. suggestions that refusing advances will adversely affect the associate's employment, performance appraisal, pay, assigned work, or any other condition of employment or career development

The above list is illustrative and not exhaustive.

5. Associate's Responsibility

- Associates must conduct themselves to uphold the values of Birlasoft and ensure a work environment that promotes respect and upholds the dignity of every Associate, especially female associates.
- Associates will be given training / orientation on this policy as part of their joining/induction. Associates will also be given regular updates and procedural awareness about the policy through mailers, posters, banners or any other means of communication, online trainings, etc. It is the responsibility of every associate to attend such orientation sessions or read and understand the organization communication and seek clarifications / assistance, if any. In addition, all associates must attend the POSH refresher training mandatorily, at least once a year.
- All Associates must read, understand and comply with this Policy on Prevention of Sexual Harassment at Workplace.
- Associates must report every incident of Harassment that they are aware and/ or encountered to the Internal Committee. To the extent possible, associates shall keep a record of incidents (dates, times, locations, possible witness, what happened, your response). It is not mandatory to have a record of events to file a complaint, but a record can strengthen your case and help Council in investigation and taking immediate appropriate action.
- Associates must cooperate with the Internal Committee or designated company officials or external parties in investigations and in preventing and curtailing sexual harassment and discrimination at the workplace.

6. Birlasoft Internal Committee (IC) on Workplace Sexual Harassment

Birlasoft has set up an Internal Committee (IC) to deal with any complaints or incidents of Sexual or Workplace Harassment based on gender. The details of the Internal Committee Members are given in this policy, which is available in our intranet portal. An associate can reach out to this IC at a dedicated and secure email, securedworkplace@birlasoft.com to log any complaint of sexual harassment.

The IC will seek assistance from external bodies/legal experts (such as NGO's / lawyers) during the course of investigation, wherever the IC deems it necessary or as required under the law of the land, for the purpose of advice and investigation. Such external bodies/experts must be associated in the field of women safety/empowerment or matters dealing with welfare of women.

7. Procedure to register complaint against a Sexual Harassment

- An associate must report any incident of sexual harassment or related grievances Internal Committee at confidential email ID securedworkplace@birlasoft.com (in place of earlier ID e-secure@birlasoft.com) as soon as the incident has occurred, but not later than 90 days of the incident, in writing over email.
- Associate should include details about the incident, including name of the accused, location of incident, date(s) & time and supporting evidence and witnesses, if any, while reporting the same.

7.1. Complaint on behalf of the victim/aggrieved person

Apart from the victim/aggrieved Associate, a complaint can be filed by any of the following persons, who has knowledge of the incident, if the Aggrieved Associate is not in the physical or mental state to file a complaint:

- Aggrieved Associate's co-worker
- Aggrieved Associate's relative
- An officer of the National Commission for Women or State Commission for Women
- Aggrieved Associate's special educator
- A qualified psychiatrist/psychologist
- Any other person who holds a written consent of the aggrieved associate to file a complaint.

8. Enquiry by the Internal Committee (IC)

This IC in accordance with local laws governing such workplace harassments and company procedure, will investigate fairly to establish any misconduct or harassment which are sexual harassment in nature as follows:

- Each reported incident will be reviewed & investigated by the IC and meet both the parties involved, if necessary to further find the facts.
- After receipt of the written complaint, the IC Chairperson will constitute the incident investigation IC consisting of a minimum of 3 members for each complaint. The IC members should be preferably from the same location as the employee's base location; however if the location IC member is unavailable the Chairperson can nominate other members to the investigation IC.
- The IC further reviews the case based on the evidence and witnesses. The IC is empowered to call for any type of evidence or any witnesses as it deem appropriate, that includes calling eye-witnesses, CCTV footage, mobile logs, messages, chats, emails or anything as it deem appropriate. The inquiry by IC shall be completed within 90 days of receiving the complete information and evidence regarding the incident.
- The Inquiry report shall be released within 10 days of completion of the investigation.
- If an individual is found guilty of sexual harassment, strict disciplinary action shall be initiated by the HRBP Lead based on the recommendations of the IC under Disciplinary Action Policy including but not limited to transfer, withholding promotion, suspension or even termination of employment.
- The HRBP/HR Head shall act on the recommendations of the IC within a period of 60 days of it receiving the recommendations.
- Appeal against the findings of the IC to the court of law is allowed within a period of 90 days from the date of recommendations of the IC.

9. False Accusations

In case the IC concludes after investigation that the complaint was false and malicious, appropriate disciplinary action under Disciplinary Action Policy shall be taken which may include termination among other penalties. This does not, however, include complaints which are difficult to prove or have been made in good faith but do not constitute Harassment per se.

10. Confidentiality

The IC ensures that the particulars of the affected parties are maintained strictly confidential, especially of the complainant. It also ensures that a congenial work environment is maintained and followed by both the parties even after the incident, in case strict disciplinary action is not taken against the accused (i.e. if services are not terminated). The IC and HR also ensure that the complainant is not harassed or victimized in any way by anybody in the company for having made the complaint.

This policy provides the broader guidelines related to workplace behaviour and consequences of non-compliances as per the provisions of the law on Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013. Law of the land will supersede and be the reference for any interpretation.

The Policy shall be subject to change from time to time and the latest version shall be available on the Intranet for Associates to refer at any time, considering the Company has a Hybrid work model.

11. Internal Committee Members

S.NO.	Employee Name	Designation/Role	Location
1	Shephali Sharma	Chairperson	Noida
2	Alka Mittal	Member	Noida
3	Shalini Duggal	Member	Noida
4	Shampa Ghosh	Member	Noida
5	Anurag Gupta	Member	Noida
6	Antara Sen Dave (1-to-1)	External Member	Noida
7	Mayank Malhotra	Member	Noida
8	Lavanya Mandava	Member	Hyderabad
9	Sharada Swayamprakasham	Member	Hyderabad
10	Vishvesh Arumugam	Member	Chennai / Coimbatore
11	Soya Joseph	Member	Bengaluru
12	Manu Kurian	Member	Bengaluru
13	Praveen Siddannavar	Member	Bengaluru
14	Sneha Padve	Member	Pune/Mumbai
15	Nayanprabha Male/kar	Member	Pune/Mumbai
16	Vipin Patel	Member	Pune/Mumbai
17	Srinivas Kunchala	Member	Pune/Mumbai
18	Sagarika Chatterjee	Member	Pune/Mumbai