

Policy Against Sexual Harassment At Workplace

Sexual harassment Policy and Procedure		
Policy # 002-HR-001	Effective Date: dated 21st August, 2024	Email: Deepali.sinha@proequity.in
Version 2.2	Contact: Deepali Sinha	Phone: 8527762933
Policy applicability: All Employees including contractual, Vendors.	Policy Owner: Head-Operations, VP & Head IT, Company Secretary & HR Manager	Last updated: dated 21st August, 2024

Document ID	File Name & sections changed	Version	Release Date
002-HR-001	Standard HR Manual	Draft 1.0	17-June-2019
002-HR-001	Major changes made after being a Ltd company and suggestion merged as per the discussion with POSH committee Members.	V2.0	1-February-2023
002-HR-001	The Erstwhile Company Secretary i.e., Ms. Chetna has resigned w.e.f. 12 th May, 2023 and Mr. Nadeem Arshad has joined the Company w.e.f. 22 nd May, 2023 and hence necessary changes in the policy document has been incorporated.	V2.1	27-March -2024
002-HR-001	The Erstwhile HR Manager- Ms. Namita Jain and Company Secretary- Mr. Nadeem Arshad has resigned w.e.f. 10 th April 2024 and 5 th July 2024 respectively and Ms. Deepali Sinha and Ms. Prachi Bansal, the new HR Manager and Company Secretary has joined the Company w.e.f. 25 th April 2024 and 1 st July 2024 respectively and hence necessary changes in the policy document has been incorporated.	V2.2	dated 21st August, 2024

1. The Policy Statement

P.E. Analytics Ltd. is committed to providing a safe environment for all its employees free from discrimination on any ground and from harassment at work including sexual harassment.

P.E. Analytics Ltd. will operate a zero tolerance policy for any form of sexual harassment in the workplace, treat all incidents seriously and promptly investigate all allegations of sexual harassment. Any person found

to have sexually harassed another will face disciplinary action, up to and including dismissal from employment.

All complaints of sexual harassment will be taken seriously and treated with respect and in confidence.

The Prevention of Sexual Harassment (PoSH) at Workplace Act of India mandates every organisation to define their sexual harassment policies, prevention systems, procedures and service rules for its employees.

2. Objectives

To set forth the expectations of conduct and mutual respect in regard to sexual harassment and the process of complaint if these expectations are not met or violated. This will help explain what sexual harassment is and how to deal with the conduct if it arises, to articulate the company's strong opposition to sexual harassment, and to identify penalties that can be imposed for such prohibited conduct. To establish clearly that this Company is committed to providing a work environment that is free from discrimination and harassment in any form.

3. Scope

This policy is applicable to all employees of **P.E. Analytics Ltd** within the premises of all the company's office spaces.

4. Definition of sexual harassment

- a) Sexual harassment is unwanted conduct of a sexual nature. The unwanted nature of sexual harassment distinguishes it from behaviour that is welcome and mutual. Physical conduct of a sexual nature includes all unwanted physical contact.
- b) Verbal forms of sexual harassment include unwelcome innuendoes, suggestions and hints, sexual advances, comments with sexual overtones, objectionable sex-related jokes or insults or unwelcome graphic comments about a person's body made in their presence or directed toward them.
- c) Any other unwelcome physical, verbal or non-verbal gesture or conduct of sexual nature or inappropriate inquiries, and unwelcome whistling directed at a person or group of persons.
- d) Non-verbal forms of sexual harassment include unwelcome gestures, indecent exposure, and the unwelcome display of sexually explicit pictures and objects in any media.

Anyone can be a Complainant of sexual harassment, regardless of their gender and of the gender of the harasser.

P.E. Analytics Ltd. recognises that sexual harassment may also occur between people of the **same gender**. What matters is that the sexual conduct is unwanted and unwelcome by the person against whom the conduct is directed.

P.E. Analytics Ltd. recognises that sexual harassment is a manifestation of power relationships and often occurs within unequal relationships in the workplace, for example between manager or supervisor and employee.

Employees of **P.E. Analytics Ltd** who sexually harasses another will be reprimanded in accordance with this internal policy.

All sexual harassment is prohibited whether it takes place within or outside the company premises, including at social events, business trips, training sessions or conferences hosted by **P.E. Analytics Ltd.**

5. Complaint Procedures

Any Employee (“Complainant”) may lodge a complaint of Sexual Harassment (“Complaint”) against an (“Alleged harasser”) who could be any employee on whom this policy is applicable, with any of the members of the Committee **within 3 Months** from the date of occurrence of the alleged incident.

Anyone who is subject to sexual harassment should, if possible, inform the alleged harasser that the conduct is unwanted and unwelcome. P.E. Analytics Ltd. recognizes that sexual harassment may occur in unequal relationships (i.e. between a supervisor and his/her employee) and that it may not be possible for the Complainant to inform the alleged harasser.

When a designated person receives a complaint of sexual harassment in writing, duly signed by the complainant on every page, the following procedure will be followed:-

- The Complaints Committee will hold a meeting with the Complainant within a period of 15 (fifteen) days of the receipt of the complaint and advance intimation in writing will be given to the Complainant of the same.
- Immediately record the dates, times and facts of the incident(s)
- Ascertain the views of the complainant as to what outcome he/she wants
- Ensure that the complainant understands the company’s procedures for dealing with the complaint
- Discuss and agree the next steps: either informal or formal complaint
- Keep a confidential record of all discussions

- Respect the choice of the complainant
- At the first meeting of the Complaints Committee, the Complainant shall be heard and her/ his statement recorded (Statement of Allegation). The Complainant can produce corroborative material with a documentary oral material, etc., to substantiate his / her complaint/ allegations.
- Thereafter, the Alleged harasser will be called by the Complaints Committee and will be informed of the Complaint and an opportunity will be given to the Alleged harasser to give an explanation, where after, an “Enquiry” shall be conducted.
- However, in the event the complaint does not fall under the purview of Sexual Harassment or the Complaint on the face of it does not disclose an element or offence of Sexual Harassment, the Complaints Committee may drop the complaint after recording the reason/s thereof and shall subsequently communicate the same to the Complainant, in writing.
- In case the complaint made by the complainant is found to be false and malafide at any stage, it shall amount to misconduct and the complainant shall be liable for appropriate disciplinary action as per the company rules.

The complaint procedure is to be resolved within **60 Days** from the date of complaints. **P.E. Analytics Ltd.** recognises that because sexual harassment often occurs in unequal relationships within the workplace, Complainants often feel that they cannot come forward. **P.E. Analytics Ltd.** understands the need to support complainant in making complaints.

Informal complaints mechanism

If the complainant wishes to deal with the matter informally, the designated person will:

- Give an opportunity to the alleged harasser to respond to the complaint
- Ensure that the alleged harasser understands the complaints mechanism
- Facilitate discussion between both parties to achieve an informal resolution which is acceptable to the complainant, or refer the matter to a designated mediator within the company to resolve the matter
- Ensure that a confidential record is kept of what happens
- Follow up after the outcome of the complaints mechanism to ensure that the behaviour has stopped
- Ensure that the above is done speedily and within 7 days of the complaint being made

Formal complaints mechanism

If the Complainant wants to make a formal complaint or if the informal complaint mechanism has not led to a satisfactory outcome for the Complainant, the formal complaint mechanism should be used to resolve the matter. The designated person who initially received the complaint will refer the matter to a senior human resources manager or to any committee member to instigate a formal investigation. The senior human resources manager/ committee member may deal with the matter him/herself, or refer it to a committee of three others in accordance with this policy given the severity of the complaint filed.

The person/committee carrying out the investigation will:

- Interview the Complainant and the alleged harasser separately
- Interview other relevant third parties separately
- Decide whether or not the incident(s) of sexual harassment took place
- Produce a report detailing the investigations, findings and any recommendations
- If the harassment took place, decide what the appropriate remedy for the Complainant is, in consultation with the Complainant.
- Follow up to ensure that the recommendations are implemented, that the behaviour has stopped.
- If it cannot determine that the harassment took place, he/she may still make recommendations to ensure proper functioning of the workplace
- Keep a record of all actions taken
- Ensure that the all records concerning the matter are kept confidential
- Ensure that the process is done as quickly as possible and in any event within 7 days of the complaint being made
- Final sanctions or disciplinary action as per the outcome of the decision of the committee will be taken.

The complaints Committee will consist of the following:

- a. Two-three representatives from other functions.(not including function of the Complainant and alleged harasser)
- b. One member from a third party such as NGO/ outside counsel or a person or body conversant with dealing with the issue of sexual harassment.
- c. It is mandatory that at-least half the members of the Complaints Committee are women and

Complaints Committee is led by a Women member. In case of separation/ death of any of the Complaints Committee member, the designate personnel will cease to be a member of the committee and an alternate member will be appointed for the position thus created.

Committee Members:

The employee's grievances committee shall consist of three designated senior representatives of the company as the case requirements. The committee would give its recommendation to the CEO for the final decision to be taken by the CEO

The complaints Committee will consist of the following members:

1. Pooja Verma – VP, Operations
2. Shantanu Pati – VP & Head IT
3. Prachi Bansal – Company Secretary
4. Garima Tripathi – President (JJF)
5. Deepali Sinha – Senior HR Manager

6. Sanctions and disciplinary measures

Anyone who has been found to have sexually harassed another person under the terms of this policy is liable to any of the following sanctions:

- Verbal or written warning
- Adverse performance evaluation
- Reduction in wages
- Transfer
- Demotion
- Suspension
- Dismissal

The nature of the sanctions will depend on the gravity and extent of the harassment. Suitable deterrent sanctions will be applied to ensure that incidents of sexual harassment are not treated as trivial. Certain serious cases, including physical violence, will result in the immediate dismissal of the harasser.

7. Implementation of this policy

P.E. Analytics Ltd. will ensure that this policy is widely disseminated to all relevant persons. It will be included in HR policies in PE Connect Portal. All new employees must be trained on the content of this policy as part of their induction into the company. Every year, **P.E. Analytics Ltd.** will require all

employees to attend a refresher-training course on the content of this policy. It is the responsibility of every manager to ensure that all his/her employees are aware of the policy.

8. Confidentiality

Notwithstanding anything contained in the Right to Information Act, 2005, contents of the complaint, the identity and addresses of the Aggrieved Woman, Respondent and witnesses, any information relating to conciliation and inquiry proceedings, recommendations of the Internal Complaints Committee and the action taken by the Company shall not be published, communicated or made known to the public, press & proceedings media in any manner.