

Policy on Prevention of Sexual Harassment of Employees in the Workplace

Policies and Processes

8 December 2022

IiAS POLICY AND PROCESS:

POLICY ON PREVENTION OF SEXUAL HARASSMENT OF EMPLOYEES IN THE WORKPLACE

PREAMBLE

Institutional Investor Advisory Services India Limited ('IiAS or the Company'), is an equal employment opportunity company and is committed to creating a healthy working environment that enables employees to work without fear of prejudice, gender bias and sexual harassment. The Company also believes that all employees have the right to be treated with dignity. Sexual harassment at the workplace or other than workplace, if involving employees, is a grave offence and is, therefore, punishable.

The Company will not tolerate discriminatory or inappropriate conduct by its employees in the workplace. All conduct that can be described as sexual harassment in the workplace will result in disciplinary action, upto and including immediate dismissal from service.

This Policy is framed in accordance with the provisions of The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013. While the Policy covers all the key aspects of the Act, for any further clarification, reference shall always be made to the Act. Any changes made subsequently to the Act will supersede the provisions of this Policy. In the event of any inconsistency between this Policy and the Act, the provisions of the Act shall prevail.

This Policy intends to provide employees protection against sexual harassment at workplace and the prevention and redressal of complaints of sexual harassment and matters related to it.

The Company management shall provide all necessary assistance for the purpose of ensuring full, effective and speedy implementation of this Policy.

SCOPE

This Policy extends to all employees of the Company and is deemed to be incorporated in the service conditions of all employees. An alleged act of sexual harassment committed during or outside of office hours falls under the purview of this policy. Further, it is important to note that whether harassment has occurred or not does not depend on the intention of the people but on the experience of the aggrieved employee.

This Policy should be read with the Code of Conduct of the Company.

DEFINITIONS

- "Employee" means a person employed at IiAS for any work on regular, temporary, ad-hoc or daily wage basis, either directly or through an agent, including a contractor, with or, without the knowledge of the principal employer, whether for remuneration or not, or working on a voluntary basis or otherwise, whether the terms of employment are express or implied and includes a co-

worker, a contract worker, probationer, trainee, apprentice or called by any other such name.

- “Workplace” includes IiAS’ corporate office and all other locations where employees have to visit on work including the mode of transport provided by the Company, if any, to undertake the journey. Remote work locations including employee homes will be considered as workplace for the purpose of this policy.
- “Sexual harassment” includes, but is not limited to, any of the following kinds of behavior, (whether directly or by implication):
 - a) Physical contact or advances of a sexual nature which includes all unwanted physical contact;
 - b) A demand or request for sexual favors, which includes, but is not limited to:
 - Sexual favoritism where a person who is in a position of authority rewards only those who respond to his/her sexual advances, whilst other deserving employees who do not submit themselves to any sexual advances are denied promotions, merit rating or salary increases.
 - Any act or conduct by a person in authority which renders the environment at workplace hostile or intimidating to a person;
 - c) Making sexually colored remarks either verbally or through any other media including digital media, including but not limited to, unwelcome innuendoes and taunts, suggestions and hints, sexual advances, comments with sexual overtones, sex-related jokes or insults, or unwelcome graphic comments about a person’s clothing or body made in their presence or directed towards them, unwelcome and inappropriate inquiries about a person’s sex life, making or posting sexual pranks, unwelcome whistling or making of any other sounds directed at a person or group of persons;
 - d) Showing pornography, including emails, SMS, etc. containing graphic pictures or videos or text or any other form of display of sexually explicit pictures and objects; or
 - e) Any other unwelcome physical, verbal or non-verbal conduct of sexual nature, including any other pervasive pattern of behavior which makes employees uncomfortable, insecure or feel humiliated or disadvantaged;
 - f) Repeatedly asking to socialize during off-duty hours or continued expressions of sexual interest against a person’s wishes;
 - g) Giving gifts or leaving objects that are sexually suggestive.

The unwanted nature of sexual harassment distinguishes it from behavior that is welcome and mutual.

- “Aggrieved employee or complainant” means an employee who alleges to have been subjected to any act of sexual harassment by the respondent.
- “Respondent” means a person against whom a complaint of sexual harassment has been made by the aggrieved employee.

INTERNAL COMPLAINTS COMMITTEE

IiAS has constituted an Internal Complaints Committee (hereinafter referred to as the “ICC”) to consider and redress complaints of Sexual Harassment. The constitution of the ICC is given below:

Role	Name	Contact points	Status of the ICC member
Presiding Officer	Ms. Hetal Dalal	hetal.dalal@iias.in; +91 22 6123 5514	Employee, President & Chief Operating Officer

Role	Name	Contact points	Status of the ICC member
Member 1	Mr. Amit Tandon	amit.tandon@iias.in; +91 22 6123 5504	Employee, Managing Director and CEO
Member 2	Ms. Nupur Jalan	nupur.jalan@iias.in; +91 22 6123 5507	Employee, Analyst
External Member	Ms. Tina Vajpeyi	tina_vajpeyi@yahoo.co.in	Counsellor, KHOJ - an NGO focused on human rights and child welfare; Trustee, Children of the World Trust and Associate Consultant: Centre for Advancement of Philanthropy and ex CFO of The Akanksha Foundation

Every member of the ICC will hold office for a period of 3 years. Their nominations will be automatically renewed for further 3-year blocks, except in cases where a member has expressed his or her desire to resign from the ICC or has resigned as an employee of the Company.

A quorum of 3 members is required to be present for the proceedings to take place. The quorum shall comprise of 3 members - the Presiding Officer and 2 more members. In the event that the Presiding Officer is unavailable, one of the other women members shall act as interim Presiding Officer.

In case any member of the ICC is a complainant or a respondent in an incident of sexual harassment, he or she will step down as a member of the ICC immediately, till the complaint has been redressed. The remaining members of the ICC will nominate a person to replace the resigned member, who will hold office till the relevant complaint and inquiry is either redressed or disposed of.

COMPLAINTS AND ENQUIRY MECHANISM

The table below outlines the process and timelines within which the complaint and inquiry mechanism will be implemented:

Step	Action	Timeline
Step 1.0	Any employee who feels and is being sexually harassed directly or indirectly, must submit a written complaint, including documentary evidence and list of witnesses, if any, to any member of the ICC	In case of a single incident, within 3 months from the date of the incident; in case of a series of incidents, within 3 months from the date of the last incident. The ICC may, at its discretion, extend the timeline by another 3 months for reasons recorded in writing
Step 2.0	At the request of the aggrieved employee, the ICC may take steps to settle the matter through conciliation	Within 10 working days of the complaint being filed
Step 2.1	Where settlement has been arrived at through conciliation (as stated in Step 2.0), the ICC will make a record of such conciliation and send it to both the complainant and the respondent	Within 30 days of the complaint being filed

Step	Action	Timeline
Step 3.0	Where there is no request for conciliation by the aggrieved employee or the conciliation has not resulted in any settlement, the ICC will initiate and complete the inquiry. The inquiry process will ensure that both parties, the complainant and the respondent, are given ample and equal opportunity to be heard by the ICC	Inquiry to be completed within 90 days of the complaint being filed
Step 4.0	ICC will submit the report of the findings and recommendation of the inquiry to both parties and IiAS' management for implementation	Within 10 days of the completion of the inquiry
Step 5.0	IiAS' management to implement the recommendation of the ICC	Within 60 days of the receipt of recommendation from the ICC or such other timeframe as may be prescribed by law

During the pendency of the inquiry process, the ICC may, upon receiving a written request by the complainant, recommend the Company to:

- (a) allow the complainant or the respondent to work from another workplace;
- (b) grant leave to the aggrieved employee (not exceeding a total of three months, which will be in addition to the annual leave granted by the Company) or
- (c) grant any other relief as may be deemed appropriate.

The ICC may decide ex-parte or terminate the inquiry proceedings if the complainant or the respondent fails to present themselves for three consecutive hearings without sufficient cause. Prior to passing an ex-parte order, the ICC will give prior written notice of fifteen days to the concerned party.

No lawyer or any other legal practitioner will be allowed to attend the proceedings of the ICC. Complainants and respondents are not eligible to bring external legal representation to the ICC proceedings.

CONCLUSIONS OF THE ENQUIRY

Where the complaint is not sustained:

Where the complaint is not sustained, the ICC may recommend to the management, that no action is required to be taken in this matter.

In case a complaint is found to be false, the complainant shall be liable for disciplinary action.

Where the complaint is sustained:

Where the complaint is sustained, the ICC shall recommend IiAS' management to take necessary disciplinary action. The disciplinary action shall be commensurate with the nature of the gravity of the offence which may include:

- Written warning to the respondent
- Written apology and a bond of good behavior to be tendered by the respondent
- Counseling
- Withholding promotion and/or increments
- Debarring from supervisory duties or specific work assignments
- Suspension
- Termination
- Or any other action that the Management may deem fit.

In case the ICC finds the degree of offence coverable under the Indian Penal Code, then this fact shall be mentioned in its report and appropriate action shall be initiated by the Management for making a compliant with the Police or such other appropriate authority.

OTHER CONSIDERATIONS

Email correspondence, for the purpose of this policy, will be construed as written communication. The ICC will maintain a register logging all complaints and redressals under this Policy. This register may be maintained electronically.

MORE GUIDANCE

Employees can refer to [The Handbook on Sexual Harassment of Women at Workplace \(Prevention, Prohibition and Redressal\) Act, 2013](#) published by Ministry of Women and Child Development, Government of India, in November 2015 for further guidance.

ABOUT THE POLICY

This policy has been presented to the Board of Directors in December 2022 and is effective from 1 January 2023. This policy will be in force until it is revised or changed.

Revisions to the policy are given below:

Versions	Written in	Effective from
4	21 January 2021	Immediately
3	August 2018	Immediately
2	January 2016	Immediately
1	December 2014	Immediately