

Policy for Prevention and Redress of Sexual Harassment

Objective:

- Viteos Capital Market Services Limited, hereinafter referred to as 'Viteos' is committed to providing a work environment that is free of harassment (sexual or otherwise), intimidation (bullying), victimisation and discrimination. These behaviours, whether directly manifested, ordered or aided, would be termed as Unacceptable Conduct.
- Respect for the individual is a key value in our code of conduct. We believe the manifestation of this value as well as ensuring a positive environment is the responsibility of each person connected with the company by work, visit, training , learning, providing services/ products or any other activity: social/ sport/ extra-curricular.
- Viteos is committed to uphold the law to prevent & redress sexual harassment and ensure that the human rights of all those who fall within its stakeholder-populace are safeguarded.

Scope:

- This policy is applicable to employees, contractors, vendors, partners, interns, trainees, visitors & guests, consultants and their employees regardless of the nature of their employment, contract or residence within the premises. For ease of reference, all such stakeholders will be referred to as the "community" in the policy.

The scope of the policy covers all

- Company Members:
 - Employees (regular or ad hoc),
 - Interns, Trainees, Students, Exchange Students
 - Vendors and their personnel, contractors and their staff
 - Consultants
 - Partners
- Outsiders:
 - Official Guests
 - Official Visitors
 - Executives who come for training, workshops etc.
 - Volunteers for the company's programs
- The policy is applicable to all regardless of gender

Policy:

Definition of Sexual Harassment: 'Sexual Harassment (SH)' includes any one or more Of the following unwelcome acts or behaviour (whether directly or by implication) namely:

- Physical contact & advances
- A demand or request for sexual favours
- Making sexually coloured remarks
- Showing pornography
- Any other unwelcome physical, verbal or non-verbal conduct of a sexual nature
- The Stress is on the 'unwelcome' element, in word or action, of a sexual nature

The following circumstances, among other circumstances, if it occurs or is present in relation to or connected with any act or behavior of sexual harassment may amount to sexual harassment:

- a) implied or explicit promise of preferential treatment in employment; or
- b) implied or explicit threat of detrimental treatment in employment; or
- c) implied or explicit about present or future employment status; or
- d) interference with work or creating an intimidating or offensive or hostile work environment; or
- e) humiliating treatment likely to affect health or safety.

Please do refer to [Annexure 1](#) of the policy for a few examples of situations that could be deemed to be sexual harassment

Definition of Workplace:

- Includes all places on the office premises
- It includes:
 1. All places of work, instruction, training, research and administration,
 2. Health centres,
 3. Sports facilities,
 4. Transport
 5. Public places on the work campus/ in the building
 6. It includes off- campus areas where members of the campus have met for social, sport or extra-curricular activity of the company/ organised by the company as well as programs/ work at third party places/ countries

Stakeholders:

The Committee: Please refer to [Annexure 2](#) for names and numbers of the Core Committee, Office Members.



The Core Committee consists of :

Bangalore

- Shashikala Suryanarayanan - Chairperson
- K R Srinivasan – Committee member
- Sudhir Segu – Committee Member
- Sangeeta Singh – Committee member
- Ragini Rao - External NGO member

Mumbai

- Shashikala Suryanarayanan - Chairperson
- Shajith Madathil - Committee member
- Girish Acharya - Committee member
- Sarita Lewis – Committee member
- Ragini Rao - External NGO member

Office of the Core Committee:

- In addition, to support the Core Committee (Bangalore and Mumbai) is the Office of the Core Committee and consists of HR and Legal support
- HR representative – Ramana Gowra
- Legal representative – Anju Prakash

Contact Officers: Contact Officers are trained investigators, who can receive complaints and can mediate conciliations:

- Core Committee members
- Office of the Committee
- Investigators/ Conciliatory panel members
- Identified HR officers

Investigators: Investigators are trained HR and mature employees who investigate cases on behalf of the committee

Line Managers:

- Support the implementation and awareness of this policy and supporting policies on an ongoing basis
- Take prompt steps to prevent sexual harassment in the workplace
- Receive complaints of alleged sexual harassment in the workplace and efficiently forward these to the Office of the Core Committee
- Treat all complaints of sexual harassment confidentially and seriously



Process:

Please refer to **Annexure 3** for the process map and SLAs

Complaints:

Statute of Limitation:

- A complaint must be made within 3 months of the last incident taking place unless the Committee is satisfied there are mitigating circumstances & extends the time limit by another 3 months

A complaint can be raised:

- By a member of the community against any other member of the community irrespective of whether the harassment is alleged to have taken place within the workplace
- By an outsider (as defined in the policy) against a member of the community or by a member of the community against an outsider (as defined in the policy), if the sexual harassment is alleged to have taken place within the workplace
- Third Party Complaints can be lodged – this includes by an observer of the incident (excluding perpetrator or victim), by a vendor/ consultant and vendors employees.
- Responsibility holders under the policy are mandated to report complaints that come to them

Channels of complaint:

The following channels are available for you to make a complaint:

- posh@viteos.com; Hotline number: 080-6608 2205 (For Bangalore) and 022-6018 2262 (For Mumbai)
- This email ID is accessed and monitored only by the two members of the Office of Core Committee
- The email ID will be used by the Office of the Core Committee to correspond with the complainant, accused, witnesses and correspondence with the core committee
- Telephone numbers: If the complaint is lodged over the telephone then the conversation is to be documented by the Office of the Committee and sent for verification to the complainant
- Physical complaint mechanism: A written or a verbal complaint can be lodged with the chairperson of the core committee

What you should do to complain:

Step 1 - Self resolution (if you are comfortable doing so)

- Unless you are very uncomfortable, the first step is to consider approaching the person or people involved and indicate that their behaviour is unwelcome
- In many cases, simply telling the person concerned that their behaviour is causing distress, explaining why it is unwelcome and asking for it to stop will



be sufficient. Often, the person is not aware that their behaviour is causing distress, and they will stop immediately once told

Step 2: Advice (if you need to talk)

- If you would like to talk to someone before you decide to lodge a formal complaint, please reach out to the HR or a Contact Officer
- The Contact Officer will treat your discussion as confidential and let you know your options. HR/ Contact Officers will be obligated to report your discussion
- A Contact Officer can and is expected to provide support to make a complaint should the complainant wish it
 - They can hear you out
 - They can advise you of your options
 - Can be present if you would like to speak to the alleged accused to tell him/her to desist from this behavior
 - They can inform you of the various communication channels
 - They can provide support to write the complaint
 - They can connect you with the committee
 - They can assist in obtaining on- and off-premise resources for medical, legal or emotional support.

Step 3 – Make a complaint

- If a complaint cannot be resolved by direct discussion, or you do not feel comfortable addressing the issue face to face, you can initiate an informal complaint or formal complaint
- Informal complaints are resolved through conciliation
- Formal complaints:
 - You should discuss the matter with/ hand over your complaint to:
 - Your Supervisor/ Skip Level Supervisor;
 - A Human Resources representative;
 - A Contact Officer; or Office of the Committee
 - A member of the Committee.
- Your complaint will then be sent by the person you have discussed the matter with to the HR representative of the Office of the Core Committee, by emailing to the ID posh@viteos.com
- Alternatively, you could make your complaint directly to the Core Committee by emailing it to posh@viteos.com
- You can turn in a written complaint to: Office of the Committee through the HR representative
- You can call the following numbers 080-6608 2205 (For Bangalore) and 022-6018 2262 (For Mumbai)
- Emails sent to the email ID posh@viteos.com are accessed by the two members of the Office of the Committee only and are treated in accordance with this Policy.
- Further information about the Complaints Process is available in [Annexure 3](#)



- Whether it is a formal or informal complaint, you can opt to have the matter resolved through conciliation. The details of the conciliation process are explained in [Annexure 4](#)
- You can bring a friend to make the complaint. However, the friend should not have a legal background or be one of the witnesses in the complaint. The friend can be present for moral support only and cannot participate in the discussions if any

Types of Complaints

- **Anonymous Complaints:** The company and the SH Core Committee reserve the right to investigate anonymous complaints
- **Formal Complaints:** Formal recorded complaints made by the complainant will be investigated and brought to closure
- **Withdrawn Complaints:** Should a complainant withdraw the complaint, the Core Committee can proceed with investigation should it be satisfied that there was coercion to withdraw and/or that there was sufficient validity to the complaint
- **Informal Complaints:** Informal complaints will be recorded by a Stakeholder and will be resolved through conciliation
- **Malafide Complaints:** Malafide/ Intentionally false complaints:
 - Allegations of Unacceptable Conduct such as discrimination, harassment, bullying and victimisation are serious matters and can potentially damage an individual's reputation.
 - If you intentionally (or with malafide intent) make false allegations that a person has been unlawfully discriminating against, harassing, intimidating or victimising another person, then you may be defaming the person.
 - Intentionally false/ malafide accusations, allegations, evidence, witness that are found to be so will be viewed seriously and will result in the company taking disciplinary action
 - If you are unsure whether this part of the Policy applies to you, you should speak to your Manager, or a Human Resources representative

Non-Retaliation:

- No person who complains in good faith, or is party to a complaint in good faith, is a witness, is a committee member shall be retaliated against.
- They will not be coerced, intimidated, victimised in any manner such that they suffer an adverse employment/ contractual/ academic consequence
- Any person retaliating against them (directly, ordering or aiding) will face disciplinary action by the company
- However, the requirements of their job and rules and regulations of their job are still applicable to all complainants, witnesses, Committee members etc.



Confidentiality:

- In instances of any alleged breach of this Policy, discretion is important to protect all people concerned.
- All information will be treated confidentially by all stakeholders involved.
- People are to be informed only on a “need to know” basis
- The obligation of confidentiality does not prevent the company from using or disclosing any material necessary to instigate or defend any legal proceedings, or make submissions in relation to any enquiry or complaint or to refer a matter to the police
- Other confidentiality compliances will be as per the Act of 2013. The Act prohibits the dissemination of any information that will identify the complainant and witnesses

Interim Action:

- Interim Action can be asked for by the complainant
- Interim Action should be recommended by the Contact Officers, recommended or validated by the committee to the Location Head/ Managing Director and implemented by the team that the LH/ MD feels is appropriate to do so
- Taking Interim Action does not mean that the complaint is proven
- These are the actions prescribed:
 - Transfer the complainant or the accused to any other workplace;
 - Grant leave to the complainant up to a period of three months; or
 - Grant such other relief to the complainant as may be prescribed

Investigation:

- Investigation is done by trained investigators.
- While the investigation team may consist of 3 people, there will at least be 2 investigators for each discussion
- They will ensure their investigation report is handed to the core committee for further action
- The following are circumstances when an external investigation may be effected:
 - When the complaint is against
 - The Director, CXO
 - A Member of the Board
 - Heads of Functions/ business
 - Chairperson or member of the Committee
 - Or any other person deemed appropriate by the chairperson and managing director/ LH (location Head)

Recommendations & Penalties:

- The Core Committee will take into cognizance the role of the accused; severity of the incident as well as prior warnings etc. given/ incidents of involvement



- Includes written apology, warning, reprimand or censure, withholding of promotion, pay rise or increments, terminating the service, undergoing counseling, carrying out community service as mentioned in [Annexure 5](#)

Communication & Training:

- The organization considers it mandatory for all joiners to undergo the workshop to understand this policy and its prevention, complaint and redress mechanisms
- All employees will have to undergo a refresher and sign off annually of having understood this policy
- The company will make the salient features of this policy available on a common platform available to all employees

Other safeguards:

- All employees have to sign the code of conduct that makes reference to this policy's stance on harassment
- All vendor/ partner/ consultant/ contractor contracts have a clause to ensure that the vendor and his/her employees have understood the salient features of the policy and know where to complain
- Any employee who has a reporting relationship with another employee/vendor/ contractor/ consultant and is in a relationship with him/her is required to report it to HR. Failing to do so will invite disciplinary action.

Legal Recourse:

- Nothing contained in this policy restricts the right of the complainant/ accused to file a case in the court of law
- The company & Committee will ensure that documents and records of mediation/investigation/ recommendation are made available to the court, as required.

Annexure 1: Examples of what constitutes Sexual Harassment:

Sexual harassment in the workplace can take various forms. It may involve, but is not limited to:

- Material that is sexual in nature, sexist, sexually explicit and so on and is displayed in the workplace, circulated, or put in someone's workspace or belongings, or on a computer or fax machine or on the Internet or any other public display system or public place on the campus of the organization
- Displays of sexually offensive material, such as emails, posters, pictures, graffiti, screen savers or text messages and other electronic postings/ communication and internet use
- Verbal abuse or comments that put down people because of their sex
- Comments about people's (women/men) bodies
- Graphic descriptions of pornography
- Sexually explicit gestures
- Unwelcome touching and hugging
- Sexist and insulting graffiti
- Sexist cartoons and jokes
- Obscene phone calls, text messages or emails
- Displaying pornography on the campus or in the hostels
- Insisting that individuals wear revealing clothing
- Inappropriate gifts
- Lewd and/or threatening letters/emails/text messages
- Brushing against sexual parts of the body, Pressing or rubbing up against a person, sexual or physical contact, such as slapping, kissing or touching
- Sexual sneak attacks, Sexual assault
- Indecent exposure
- Subtle or overt pressure for sexual favours
- Soliciting or demanding sexual services
- Repeated sexual invitations when the person invited has refused/ignored similar invitations
- Requests for sexual favours, or sexual advances with or without promises of benefit/ preferential treatment or punishment/ detrimental treatment explicitly or implicitly
- Leering, wolf whistles, obscene gestures, jokes or innuendo
- Comments or a conversation about a person's sex life or relationships;
- Repeatedly asking for a date after the person has said "no"

Annexure 2:

Details of the Core Committee and Office: Mumbai

Name	Role under the Core Committee	Contact details
Shashikala Suryanarayanan	Chairperson	sshashikala@viteos.com
Sarita Lewis	Core Committee Member	sarita.lewis@viteos.com
Shajith Madathil	Core Committee Member	Shajith.madathil@viteos.com
Girish Acharya	Core Committee Member	agirish@viteos.com
Ragini Rao	External NGO Member	raginirao04@gmail.com
Ramana Gowra	HR representative to Office of the Core Committee	ramang@rocketmail.com or posh@viteos.com
Anju Prakash	Legal representative to Office of the Core Committee	aprakash@velankanigroup.com

Details of the Core Committee and Office: Bangalore

Name	Role under the Core Committee	Contact details
Shashikala Suryanarayanan	Chairperson	sshashikala@viteos.com
Sangeeta Singh	Core Committee Member	sangeeta.singh@viteos.com
K S Srinivasan	Core Committee Member	srinivasan.ks@viteos.com
Sudhir Segu	Core Committee Member	sudhir.segu@viteos.com
Ragini Rao	External NGO Member	raginirao04@gmail.com
Ramana Gowra	HR representative to Office of the Core Committee	ramang@rocketmail.com or posh@viteos.com
Anju Prakash	Legal representative to Office of the Core Committee	aprakash@velankanigroup.com

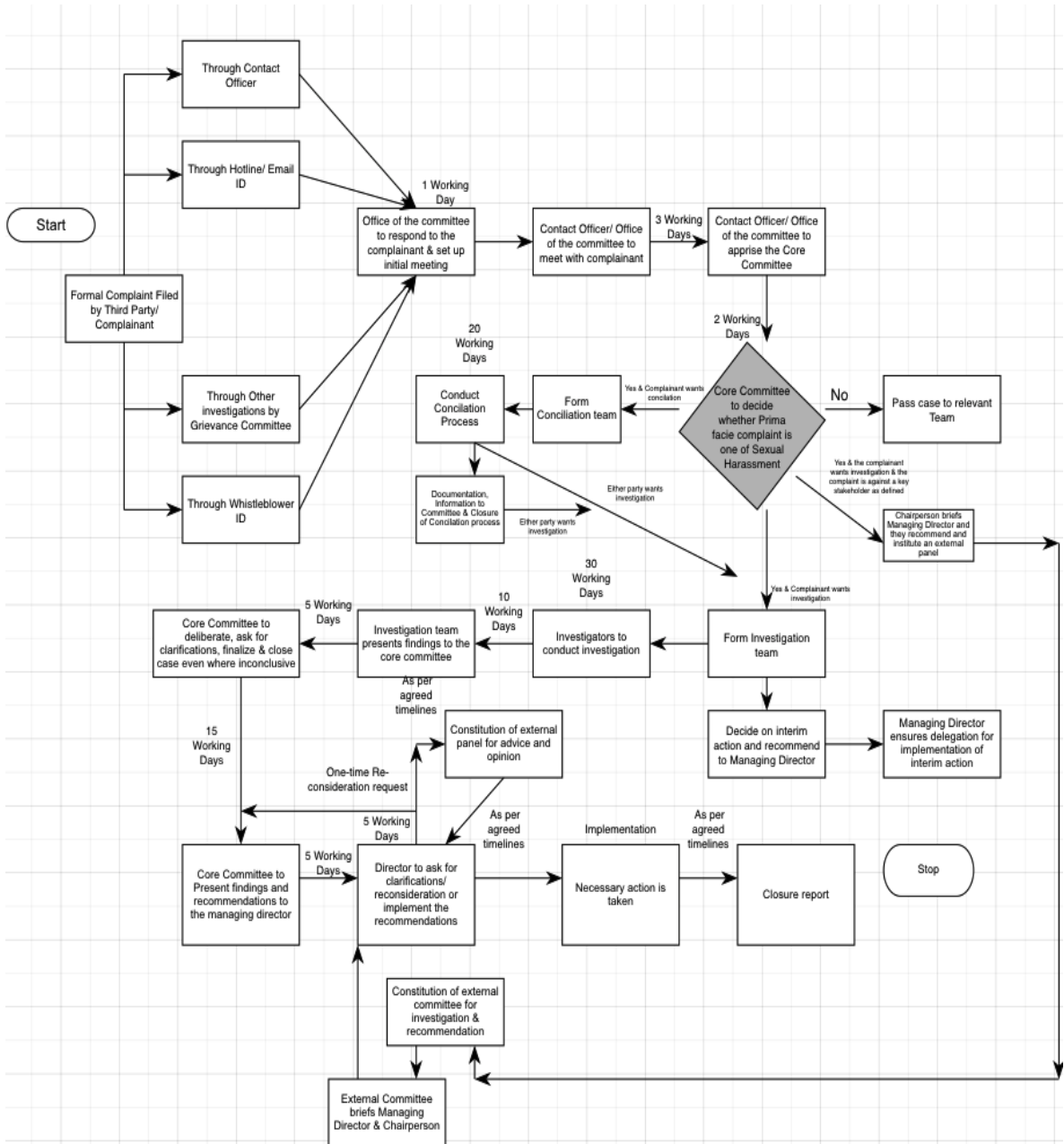
List of Investigators: Mumbai

Shashikant Shetty
Kumail Jillisger
Sujatha Parabh

List of Investigators: Bangalore

Amit Aggarwal
Shweta Tatia

Annexure 3: Process



Annexure 4: Conciliation

- The primary objective of conciliation is to permit the parties to resolve the dispute on their own, quickly and confidentially.
- Both the complaining party or parties and accused must agree to conciliation.
- At any stage during or upon the conclusion of the process, either party may decide to proceed by formal investigation.
- Conciliation will be conducted by trained Contact Officers in the presence of an HR professional.
- During the process, Conciliators will contact no person other than the complainant and the accused.
- Both parties must respect the confidentiality of the process.
- The outcome of the conciliation and actions taken will also be recorded
- If the complaint is conciliated successfully, the panel will prepare a conciliation agreement presenting the agreed-upon terms that comply with the company's policies and procedures.
- The two parties must sign the agreement to indicate the dispute is fully and finally resolved.
- There is no monetary compensation under the conciliation.
- If a party fails to comply with this agreement, the other party may seek the intervention of an internal panel (as determined by the Core Committee) and the agreement may be used in evidence in any subsequent complaints/ suit

Annexure 5: Penalties

Sno	Penalties
1	Warning
2	Reprimand or censure
3	Public Written apology by the accused
4	Community Service
5	Curtailement of privileges
6	Bar on representing the company at any extra or co-curricular activity
7	Removal or bar on holding positions of responsibility within the company
8	Fine imposed by the committee that may be donated to a fund/ charity
9	Mandatory attendance in a sexual harassment workshop or program
10	Any other action prescribed in the Act/ code of conduct/ service rules/ contract rules
11	Termination
12	Suspension
13	Demotion
14	Withholding increments
15	Withholding promotion
16	Bond of good behavior
17	Debarring from supervisory duties