

Policy on Sexual Harassment at Workplace (Prevention, Prohibition and Redressal)

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1. Preamble

- 1.1 AXISCADES Technologies Limited and its subsidiaries (**hence forth referred to as “AXISCADES” or “Company”**) is committed towards creating a safe and healthy work environment that enables its employees to work without fear of prejudice, gender bias and sexual harassment.
- 1.2 The policy is made under the overall ambit of the statutory requirement in the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013.

2. Objective

- 2.1 The policy has been formulated to create and maintain a safe working environment where all employees treat each other with professional courtesy, dignity and respect irrespective of their gender, race, caste, creed, religion, place of origin, sexual orientation, disability, economic status or position in the hierarchy. Employees at AXISCADES are entitled to work in an environment free from any form of discrimination or conduct which can be considered harassing, coercive, or disruptive.
- 2.2 To articulate the guidelines on sexual harassment and to provide a mechanism for the prevention and redressal of complaints of sexual harassment.
- 2.3 To assist individuals who believe that they have been subjected to such behaviour with appropriate support and remedial action.

3. Scope and Applicability

- 3.1 This policy is applicable to all Employees of AXISCADES regardless of the position, including those on contract with the Company.
- 3.2 The policy will also cover trainees, consultants, interns, contractors and outsourced staff associated with AXISCADES.
- 3.3 The policy will remain applicable wherever such persons have occasion to interact with each other or have a working relationship including for example, in vehicles, third party premises, off site meetings, public venues, social media and other personal social platforms.
- 3.4 It covers sexual harassment against all genders and AXISCADES follows a gender neutral policy. Harassment is unlawful irrespective of who is involved in the behaviour.

Note: *Ignorance of any aspect of this policy will not be a defence during an enquiry on the matter.*

4. Definitions

Act: means the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 which extend to the whole of India.

Aggrieved Party: means in relation to workplace, any person who alleges to have been subjected to any act of sexual harassment by the respondent.

Internal Committee: means an Internal Committee constituted under Section 4 of the Act.

Respondent: means a person against whom the aggrieved person has made complaint under section 9 of the Act.

Workplace:

“Workplace” includes – Head Office, Corporate Office and Branch Offices of AXISCADES. It also includes any place visited by the employee arising out of or during the course of employment including transportation provided by the employer for undertaking such journey and all places where a working relationship exists including third party premises, off site meetings, public venues, social media and other personal social platforms.

Employer:

Employer refers to **AXISCADES or Company.**

5. What constitute Sexual Harassment

- 5.1 Sexual Harassment includes any one or more of the following unwelcome acts or behaviour (whether directly or by implication) viz.:
- Physical contact and advances; or
 - A demand for request for sexual favours; or
 - Making Sexually coloured remarks; or
 - Showing pornography; or
 - Any other unwelcome physical, verbal or non-verbal conduct of sexual nature.
- 5.2 All such conducts becomes sexual harassment whether textual, graphic or electronic or by any other actions which may contain:
- Implied or explicit promise of preferential treatment in the aggrieved person’s employment; or
 - An implied or explicit threat of detrimental treatment in that aggrieved person’s employment; or
 - An implied or explicit threat about her present or future employment status of aggrieved person; or

- (iv) The conduct interferes with an employee's work or creates an intimidating, hostile or offensive work environment; or
- (v) Humiliating treatment that is likely to affect health and safety.

Note: It is the impact or effect of the behaviour on the recipient and not the intent of the offender that is critical in an assessment of such issues/cases. If the behaviour can be reasonably perceived as offensive or intimidating by the persons receiving it, it should be stopped. As such, all employees have a responsibility to primarily communicate clearly to colleagues about behaviour that may be offensive and ask that it be discontinued.

Additionally, AXISCADES holds the right to prohibit any conduct as a disciplinary action that may reasonably be interpreted as harassment whether or not such conduct is pervasive and severe enough to meet the technical legal requirements of harassment.

5.3 The term Sexual Harassment also includes such **unwelcome** sexually determined conduct (whether directly or by implication) as:

A) Physical Harassment, which includes:

- Physical contact and advances
- Intentional touching, pinching, grabbing, fondling, patting, brushing against another's body
- Sexual intimidation
- Any physical conduct which is unwelcome

B) Verbal Harassment, which includes:

- A demand or request for sexual favours over promises related to employment such as work conditions, promotion, and increments. This is known as "quid pro quo" sexual harassment.
- Gesture-based harassment - sexually coloured remarks
- Making direct or indirect sexually suggestive comments, threats, slurs, sexual propositions, jeering
- Sexual jokes or teasing, misogynist humour, sexually coloured gender specific jokes

C) Written Or Graphic Harassment, which includes:

- Showing pornography, and
- The display of pornographic material
- Written material that is sexual in nature such a letter or notes containing a sexual Comment
- Leering or staring at another's body and/ or sexually suggested gesturing.
- Displaying sexually visual material such as pinups, cartoons, graffiti, computer programmes, catalogues of a sexual nature
- Sexual messages or images sent via text / e-mails which may be perceived by the recipient as creating a hostile work environment.

D) Any Other Unwelcome Physical, Verbal or Non-Verbal Conduct of sexual nature apart from those listed above will constitute as sexual harassment if by reasonable perception and

common discretion qualifies as sexually offensive and/or creating a hostile work environment.

6. Consensual Sexual Relationships at workplace

Should there be any kind of romantic or sexual relationships amongst AXISCADES employees, such relationships could sometime lead to conflicts of interest at work. Hence, in the best interest of all concerned, if any of such relationship, particularly between a member of Management or other supervisory employee and his or her staff (an employee who reports directly or indirectly to that person) or otherwise working at the same workplace or team; the involved parties should notify Management of the Company so that the reporting chain can be altered to ensure that no direct or indirect reporting relationship continues and ensure a cordial relationship is maintained at all times without affecting the process of work at AXISCADES. Many a times consensual relationships turn sour and resulting in one of them harassing the other person who has moved on. This form of continuous stalking post closure of a consensual relationship will also result in harassment complaints later and the said situation on a case-to-case basis can consider this as a form of sexual harassment.

7. Internal Committee

The Company has formed an Internal Committee which will manage the process of enquiry and redressal of sexual harassment complaints in accordance with the provisions of the Act. The name, designation and contact details of the members of the committee have been furnished in ***Annexure 1.***

7.1 Formation of Regional Sub-Committees for Investigation of Complaint

The Internal Committee shall have the power to constitute one or more sub-committee at regional level for effective investigation mechanism. In constituting a sub-committee care shall be taken to ensure that majority of the members of the sub-committee are women members and all members of the sub-committee should be neutral and unbiased. The sub-committee will function as Internal Committee at regional level. The sub-committee shall forward the investigation report to the Internal Committee for taking appropriate action in accordance with the Policy. The name, designation and contact details of the sub-committee members will be updated in Annexure once formed based on required .

8. Ongoing Training and Communication

- 8.1 Prevention of Sexual Harassment policy to be current and create artefacts for continuous education to employees
- 8.2 Mandatory training for new hires and freshers. Refresher training for employees at all

levels at least once a year. Employees sign a declaration for having undergone POSH training.

- 8.3 Provide managers and HR with extended training on how to respond to incidents of sexual harassment, as well as how to monitor for signs of bullying and harassment
- 8.4 To assist individuals who believe that they have been subjected to such behavior with appropriate support.

9. Reporting

An employee who is the recipient of any inappropriate conduct or unwelcome behaviour, indicating sexual harassment is expected and encouraged to report the same to the Internal Committee (wecare@axiscades.com) within 90 days from the date of occurrence of the incident/s.

All precaution will be taken to protect the privacy of individuals involved. Where the complaint cannot be made in writing by the Complainant, the Presiding Officer or any member of the Committee shall, pursuant to receipt of the oral complaint, reduce the same to writing. The Complainant and the member (who has reduced the oral complaint to writing) shall affix their signatures to the said complaint.

- 9.1 The Committee will maintain a register/log of complaints (Sexual Harassment Complaint Register) to record the complaint received from the Complainant and keep the contents of the complaint confidential. *Sexual Harassment Complaint Register AXC-F-SHCR.*
- 9.2 Chairman or Presiding Officer of the committee will decide whether it is a sexual harassment case in consultation with the external member, if required. If it is sexual harassment case, IC will investigate further, if not the same will be sent to HR department for necessary action and resolution.

10.Redressal Processes

The redressal process will be sensitive to the particularly delicate nature of Complaints related to sexual harassment.

Two types of redressal processes can be adopted:

10.1 Conciliation

IC shall as a formal redressal process approach the Parties to the proceedings to conciliate in a matter. Based on the concurrence of both the Parties to the enquiry the IC can conclude the hearing as conciliation. The conciliation will be through an official or a committee member no direct conciliation is permitted after complaint is registered. IC will observe that the issue is not repeated by the alleged accused. In case of a disapproval for conciliation by either of the Party

then the IC will proceed to redress the same through a formal redressal process.

10.2 Formal Redressal Process

The steps of Formal Redressal process are as follows [The flowchart is available in Annexure – 2]

10.2.1 Receipt of complaints:

- All complaints should be in writing to ensure consistency and accuracy. Where there is difficulty in giving the complaint in writing the Internal Complaints Committee shall render all reasonable assistance to the aggrieved for making the complaint in writing:
- The complaint should be made within **90 days** from the date of occurrence of the alleged incident.
- However, due to the sensitivity of this issue and the emotional toll that may have been experienced, a delay may be considered favourably by the Internal Committee conducting the enquiry, provided the complainant submits sufficient cause for such delay.
- The name of the alleged offender including designation and contact numbers should be mentioned in the written complaint.
- The date, time and location of the alleged incident of harassment should be mentioned.
- A detailed description of the incident(s) in question as well as other relevant circumstances should be mentioned.
- Names of witnesses and physical and/or documentary proof, if any, that supports the allegation including other potential complaints, if any, should be mentioned.
- The complaint letter should be signed and dated; no anonymous complaints shall be accepted.
- Where the aggrieved is unable to make a complaint on account of their physical or mental capacity or death or otherwise, their relative or legal heir or such other person as may be prescribed by the Act and the Rules may make a complaint.
- *Review the complaints form and validate against all the above points, if necessary modify. Sexual Harassment complaint form AXC- F-SHCF*

10.2.2 The committee shall hold a meeting with the Complainant within 7 working days of the receipt of the complaint, but not later than 10 working days in any case. In exceptional cases, emergency meeting may be convened by the Presiding Officer as per the requirement. The complainant and the respondent should be given a written notification to present themselves before the committee.

10.2.3 At the first meeting, the Committee shall hear the Complainant and record his / her allegations. The Complainant can also submit any corroborative material with a documentary proof, oral or written, etc. to substantiate the complaint. If the Complainant does not wish to depose in person due to embarrassment of

narration of events, a lady Committee Member for lady employee(s) and a male Committee Member for male employee(s) shall meet and record the statement.

- 10.2.4 Thereafter, the Committee shall send show cause notice to the person against whom the Complaint is made allowing three days' time for response. After receiving the response for show cause notice, respondent will be summoned for the purposes of a deposition before the Committee and an opportunity shall be given to such person to give an explanation to the allegations.
- 10.2.5 Based on the type and severity of the complaint, the Committee may direct that case requires an Inquiry be conducted with a detailed investigation. The Internal Committee may not order an inquiry, if examination of witness / documents is not necessary to arrive at a conclusion.
- 10.2.6 In the investigation, it should be ensured that at all times the dignity of both the complainant and the alleged harasser is respected by conducting the enquiry in utmost confidentiality.
- 10.2.7 During the course of investigation, both the parties will be given an opportunity of being heard and a copy of the findings shall be made available to both the parties enabling them to make representation against the findings before the Committee.
- 10.2.8 While undertaking investigation of a complaint, the committee shall take the following into consideration:
- Whether the conduct was verbal or physical or both
 - How frequently it happened
 - Whether the conduct was unwelcome
 - The working relationship in terms of hierarchies between the alleged harasser and the affected person
 - Whether others joined in perpetuating the harassment
 - Whether harassment was directed at more than one individual
 - The impact of the harassment on the affected person
- 10.2.9 During the pendency of inquiry, on a written request made by the aggrieved, the Internal Committee may recommend to the employer to-
- Transfer the aggrieved or the respondent to any other work place; or
 - Place the respondent on suspension based on the magnitude of the alleged harassment caused by the respondent as per the service rules of the Company; or
 -
 - Grant leave to the aggrieved woman upto a period three months; or
 -
 - Grant such other relief to the aggrieved woman/man as may be prescribed under the Act or Rules made thereunder.
 - Provide counselling aid to the aggrieved women/man at cost to her.

10.2.10 Corrective Actions:

Where an incident of harassment has been substantiated, corrective/ disciplinary action based on the gravity of the offence will be recommended by the Internal Committee. The range of penalties can vary from (but not be limited to):

- A letter of warning be sent to the employee and a copy of which shall be placed in the personal file of that employee by Human Resource Department.
- Immediate transfer or suspension without pay or both.
-
- Deduction from salary or wages of the Respondent such sum as may be considered appropriate to be paid to the aggrieved employee or to their legal heir.
- Stoppage of increment with or without cumulative effect.
- Reduction in rank.
- Termination / dismissal from the services of the Company.
-
- Filing a complaint before the relevant police station or court.
-
- A second or repeated offence shall on the recommendation of the Internal Complaints Committee attract an enhanced penalty.

Where the Internal Complaints Committee comes to the conclusion that allegation against the respondent has not been proved, it shall recommend to the employer that no action is required to be taken in the matter.

Where the Internal Complaints Committee finds the complaint to be false or untrue the corrective actions can be recommended against the Complainant.

AXISCADES management will act upon the recommendations within sixty days of receipt of the order from the Internal Complaints Committee.

10.2.11 Communication

The disciplinary action to be awarded should be disclosed to the respondent and the complainant separately.

The information regarding an event of sexual harassment may be sensitively disseminated after completion of the redressal process amongst the employees without disclosing name, address, identity or any other particulars which lead to the identification of the aggrieved party and witnesses.

The committee at all times should be sensitive to the possibility of the harasser displaying retaliatory behavior.

11. Confidentiality

It shall be the duty of all the persons involved in the inquiry process to ensure that all complaints lodged are treated with utmost confidentiality. Any breach of this can invite disciplinary action before, during or after the inquiry.

12. Protection against retaliation

Retaliation is a serious violation of this policy. The Company forbids any form of retaliation against anyone who has reported a suspected episode of harassment or has cooperated in any investigation involving a reported case. (Examples of retaliation may include – but are not limited to - threatening a negative action on terms of employment, unsubstantiated negative performance evaluation, continued harassment in any form, discriminatory treatment or failure to provide or consider individual concerned for a Company benefit or for a warranted role, title, training or promotion).

If anyone feels that he / she is experiencing retaliation of the nature of intimidation, pressure to withdraw the case or threats for reporting, testifying or otherwise participating in the proceedings, should report the matter to the **Internal Committee**.

As with complaints of harassment, this too will be treated as misconduct and AXISCADES will take appropriate action to prevent / rectify the retaliation. It will be treated as seriously as an alleged case of harassment and will apply even if the original complaint is not proven. Similarly, bringing undue influence whether directly or indirectly, to the proceedings of an Inquiry by either party will be treated as misconduct and be subjected to disciplinary action.

13. Treatment of False Complaints/ Allegations

Where the **Internal Committee** arrives at a conclusion that the allegation against the accused person is false or malicious or the aggrieved person has made the complaint knowing it to be false or the aggrieved person has produced forged or misleading documents / evidence, such behaviour will be construed as a major misconduct and will be liable for disciplinary action including termination of services.

14. Separated Employees

The Committee shall receive complaints, as per this Policy, from an employee who has experienced such harassment during his / her employment but has since left AXISCADES so long as the complaint is received in writing within 3 months from the date of incidence.

15. Roles and Responsibilities

15.1 Employees

Employees are encouraged to familiarize themselves with the key elements of the policy and should:

- Participate in awareness sessions
- Abstain from committing any acts which amount to sexual harassment.
- Report incidents of sexual harassment without fear or favour.
- Create an environment of conduciveness for co-workers to work together without fear of harassment or hostility.
- Maintain confidentiality
- Save evidences like mails, messages, gifts, photogram etc.

15.2 Head of Departments

- Provide appropriate working conditions in respect of work and ensure there is no hostile environment in the work place.
- Guide the employee as to the proper procedure for registering the complaint.
- Do not initiate an enquiry on your own.
- When approached by an employee for your counsel, avoid making a quick judgment as to the right and wrong and hold back advice / opinions and guide them to approach the appropriate authority to seek redressal.
- Since it is difficult for victims of harassment to come forward with their complaints; do not cross – question the individual or give the impression of doubting the authenticity of his / her report.
- Report any complaint or grievance immediately to the concerned authorities.
- Ensure privacy for the meeting and help the employee feel that confidentiality will be maintained.
- Ensure that there is no retaliation or retribution happening at the workplace where the supposed action is to have taken place.
- Ensure that issues pertaining to sexual harassment are discussed periodically during the meeting. During such meetings, relevant details such as the brief outline of this policy, the details of the members of the Complaints Redressal Committee shall also be discussed.
- Implement the disciplinary action along with HR.

15.3 HR Department

- Conduct necessary communication and training across the Company, with respect to sexual harassment at the workplace.
- Enable implementation of sexual harassment awareness programmes.
- Ensure this policy is communicated, explained and handed over at the time of

induction of every employee.

- Any act of sexual harassment to be notified as misconduct under the standing orders of the Company.
- Provide sufficient security at the entry as well as the exit points and in cases where women employees are transported from and to the work place working in late shift hours.
- Clarify to Employees on any queries related to this policy wherever required.
- Maintain records of all the Sexual Harassment cases and finding.

16. Disclaimer

The Company shall not be liable or responsible for any acts or omissions that the parties to whom this policy applies may commit in their personal capacity.

ANNEXURE – 1

AXISCADES Internal Committee

Given below are the names, designations and contact details of the members of the **Internal Committee at AXISCADES** and the Presiding Officer of the committee is **Ms. Akhila D S**

Sr. No.	Name	Designation	Location	Role	Contact Details
1	Akhila D S	General Manager	Bangalore	Presiding Officer	akhila@mistralsolutions.com
2	Madhuri Aravinda Nukala	Assistant Vice President	Hyderabad	IC Member	madhuri.nukala@axiscades.com
3	Sonal Dudani	Company Secretary	Bangalore	IC Member	sonal.d@axiscades.in
4	B V Harishbabu	Assistant Vice President	Chennai	IC Member	harishbabu.bv@axiscades.in
5	Gajalakshmi A	HOD-Quality Assurance & Chief Risk Officer	Bangalore	IC Member	gajalakshmi.a@axis.aero
6	Sarvanidhi Thakur	Senior Product Manager	Bangalore	IC Member	sarvanidhi@mistralsolutions.com
7	Jinesh Thomas	Project Manager	Hyderabad	IC Member	jinesh@mistralsolutions.com
8	Pandiyarajan R	Project Lead	Kovilpatti	IC Member	pandiya.r@mistralsolutions.com
9	Deepti Ayathan	Advocate & External counsel	Bangalore	External Member	deepti.ayathan@gmail.com
10	Aasthi S Hegde	Executive	Bangalore	POSH IC Coordinator	aasthi.hegde@axiscades.in
11	Pushpalatha K B	Deputy Manager - Finance & Accounts	Chennai	IC Member	pushpalatha@epcogen.com
12	Sowbaghyanathan M	Project Manager	Chennai	IC Member	sowbaghyanathan@epcogen.com
13	Sarumathi Devi G	Principal Engineer	Chennai	IC Member	sarumathi@epcogen.com

Annexure – 2

Process Flowchart for the Investigation Process & Timeline under Formal Redressal Process

