



Prevention of Sexual Harassment at Workplace

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1.1. Objective and Scope

Accelya India is committed to providing a secure and inclusive work environment, upholding the dignity of all employees. We prioritize to underscore measures to prevent and prohibit sexual harassment at the workplace.

The scope encompasses all individuals, including employees both permanent & temporary, consultants, interns, trainees, volunteers, third parties, insource, and visitors, who are affiliated with Accelya working on-premise, hybrid and remotely at all business units or functions of the company.

1.2. Sexual Harassment Inclusions

Sexual harassment includes making unwelcome advances, unreasonable act, sexual flirtations or propositions, continual or repeated verbal abuse of a sexual nature, graphic verbal commentaries about an individual's body, sexually degrading words used to describe an individual, humor and jokes about sex or gender specific traits, sexual innuendo, display in the workplace of sexually suggestive objects or pictures, and transmission of sexual messages via voice mail, regular mail, e-mail or the Internet or Intranet.

Quid pro quo sexual harassment involves seeking something in return or an exchange of favours. In the workplace, it occurs when sexual favours are demanded in exchange for special treatment on the job. The request or offer for sexual favours may be verbal or implied, and the conduct can be either verbal or physical.

Hostile work environment sexual harassment arises from offensive sexual speech or conduct that interferes with work performance. It includes intimidating or harassing behavior directed at individuals or groups, and related retaliation, such as social ostracization, and physical or psychological intimidation of the victim or their close associates.

Posting unwelcome sexual comments, even while remote working, is deemed a 'workplace incident' subject to disciplinary action. This includes digital spaces accessed during work, like office-provided communication channels, and publicly available social media or electronic tools used for official and personal communication.

Non-verbal harassment, refers to sexually suggestive gestures such as nods, winks, gestures with hands, fingers, legs, or arms and making colleagues uncomfortably by looking at their body while communicating with them.



Emotional harassment, which refers to behaviour that isolates or is discriminatory towards or excludes a person on the grounds of his sex or neutrality.

1.3. Internal committee

An Internal committee is consisting of one (1) chairperson and four (4) members which includes at least 50% women representation including a convenor and headed by a lady employee in leadership position centrally to proactively address issues related to sexual harassment and to provide the procedure for resolution, settlement or prosecution of related acts. The committee will also have one (1) representation from independent NGO or a legal body or any other social work body familiar with the issues of sexual harassment.

If any member of the Internal committee ceases employment with company, his/her membership will be ceased and a new member will be appointed at the earliest.

1.4. POSH Procedure

Complain Registration

- Accelya has zero-tolerance towards any act of Sexual harassment at the workplace.
- Complain to be filed by sending an email to posh@accelya.com or it can be routed through the internal committee within 3 months of the date of last incident in writing. For ex-employees, the complaint should be registered within 180 days of the last working day. The complaint should be submitted in writing.
- Complainant should try but not mandatory to provide records of incidents i.e. dates, times, locations, possible witness, what happened, response etc. while registering the complaint.
- A colleague or a co-worker can initiate the complaint in place of the victim, in the afore-said time frame.
- The Chairperson and internal committee members should be made aware of the complaint within 3 days of the complaint and an internal discussion should be conducted.
- The Internal committee shall discuss and decide on its jurisdiction to deal with the case or reject the complaint prima facie and recommend that no action is required to be taken in the matter.
- In the event, any IC member is from the same functions or department as either the harasser or victim are from, then immediately, that member should inform the Presiding Officer about the same and the Presiding Officer will take decisions appropriately.
- Complaint if considered for action, complainant need to acknowledge the complaint by signing the complaint document.
- Notice shall be issued to the respondent within 7 working days of receipt of the complaint and 10 working days shall be given for submission of reply (along with the list of witnesses and documents.)



- If it is determined that harassment has occurred; prompt, remedial action will be taken; but if the complaint does not rise to the level of sexual harassment, the committee may determine to dismiss the complaint without further investigation. The convener will record this finding with reasons and communicate the same to the complainant.
- Where the aggrieved employee is unable to make a complaint on account of her/his physical or mental incapacity or death or otherwise, her/his legal heir or such other person as may be prescribed may make a complaint within 3 months of the incident.
- Anonymous complaints will not be entertained by the IC. However, the same will be looked into as per provisions of the code of conduct policy.

Conciliation

- Before initiating an inquiry, IC may, at the request of the aggrieved person, take steps to settle the matter between the complainant and respondent through conciliation.
- No monetary settlement can be made on the basis of conciliation.
- In case of settlement through conciliation, IC will record the settlement, with reasons and forwards the same to Senior Vice President – People & Culture for specific action as per recommendation. Also, provide copies of settlement to both complainant and respondent.
- In case, the terms of the settlement are not complied with, IC will conduct a formal inquiry. Post-settlement, no further inquiry is required to be conducted by IC.

Enquiry

In the event, the complainant does not wish to initiate settlement through conciliation, an inquiry will be initiated against the respondent by IC.

IC will conduct all proceedings in a closed room and/or in-camera (if required), wherein both the complainant and the respondent will be heard separately.


Verbal Hearings & Documentation

Separate hearings for both parties and equal opportunities will be given to both parties to be heard. All evidence including proofs, documents, testimonies and witnesses will be considered.

- IC may cross-examine the complainant and the respondent.
- On request, witnesses may be allowed from each side to substantiate their claims.
- IC may, however on their discretion, call upon or question any other person who they think might have knowledge of the incident.
- Any person who appears as a witness before the IC must maintain the confidential nature of the inquiry. In case, such a person is found to be divulging information to any other person, disciplinary action will be conducted against such person.
- The inquiry must be completed within a period of 90 days on the filing of the complaint.

Completion of Investigation

After concluding the investigation, the committee Convener will compile a report disclosing the findings to both parties. The Senior Vice President - People and Culture, Location HR Operations,



and committee chairperson will review the report within 3 weeks. The Senior Vice President - People and Culture and the committee chairperson approves the disciplinary actions based on the agreed-upon timeframe and specific case details.

1.5. Decision and Action

- Upon reaching a settlement, the Convener records it and forwards to Human Resources for recommended action.
- Human Resources must implement Internal committee recommendations within 60 days, adhering to agreed or case-specific timeframes.
- Post-sanctioned settlements, the Internal committee refrains from further inquiry. The Complainant may refer to the Internal committee for redressal if the terms of settlement are not complied.
- Upon finding of Sexual Harassment, the Internal committee may take actions, including misconduct consequences, verbal/written warnings, formal apologies, suspension, counselling, withholding increments/promotions, deducting appropriate sums, termination, or financial penalties based on incident severity and sensitivity.
- The report of the investigation and resolution of the case, needs to be shared with Senior Vice President – People & Culture and the Managing Director.

1.6. Sexual Harassment Measures

- False complaints regarding sexual harassment are deemed policy violations. If an investigation reveals a complainant's malicious intent, knowingly false allegations, or submission of misleading documents, the Internal committee will recommend HR action against the complainant.
 - To prevent victimization, if a respondent is the complainant's manager, they cannot act as the manager during the investigation and after the investigation if found guilty.
 - The company commits to preventing harassment by publishing new policies and relevant information.
 - Management would support the Internal committee and ensures prompt implementation of decisions.
 - Confidentiality is maintained throughout investigations, respecting complainants' privacy. Proceedings continue despite parallel civil or criminal actions.
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