



Policy for addressing Sexual Harassment at workplace

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Policy for addressing /Sexual Harassment at workplace

Purpose:

The objective of this policy is to provide a framework to ensure that Sasken is committed to providing a work environment that is safe, fair and free of /sexual harassment for all employees and representatives of clients, visitors and vendors.

The company firmly believes that every employee has a right to work in an environment free from harassing, intimidating or offensive behavior and in which issues of harassment will be resolved without fear of reprisal. The policy is designed to take effective measures in accordance with the applicable law to avoid and to eliminate and if necessary, to impose punishment for any sexual harassment.

Sasken has the responsibility of following the applicable employment laws and regulations wherever it operates. This includes observing those guidelines to ensure that employees are not subjected to behavior that may constitute sexual or any kind of harassment.

Scope:

The policy covers all employees of Sasken Technologies Limited across global locations including its subsidiaries, regardless of the nature of employment, and includes, contractors, consultants, trainers employed/ engaged by Sasken and all clients, service providers, vendors and business visitors or any other third parties with whom the company has business dealings.

This policy is applicable to all of the above, whilst at work, and/or whilst present at Company events, training courses (residential or otherwise) and/ or while present on the company premises for any other matter pertaining to the company. This also includes the use of company provided communication facilities such as computers and telephone (including voicemail, email and the Internet/ intranet). This policy is also applicable to employees while on travel to and from workplace or when two or more employees are on travel away from workplace on official work or on work from Home while discharging duties for the organization or in the course of working in Hybrid model

Without any prejudice to the generality of the foregoing clause, this policy is for all women employees of Sasken and its branches and subsidiaries.

Sexual Harassment of women at workplace is considered as violation of women's right to equality, life and liberty. The Hon'ble Supreme Court in the case of Vishaka and others Vs. State of Rajasthan 1997 AIR SC 3011 also re-affirmed that sexual harassment at work place is a form of discrimination against women and recognized that it violates the constitutional right to equality and provided guidelines to address this issue pending the enactment of a suitable legislation.

Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 has come in to force w.e.f. 09-Dec-2013. The rules in the matter have been notified and come into force w.e.f. 09-Dec-2013. Under section 19(b) of the Act it is obligatory for an employer to frame the policy for prevention of sexual harassment at the workplace and the procedure for dealing with the complaints arising from such Acts and display the same in a conspicuous place in the workplace. Accordingly, this policy has been framed and notified for the information of all employees.



In countries where this policy is inconsistent with the host country specific laws and regulations, the host country specific laws and regulations will prevail.

Policy Statements:

1. Sasken will not discriminate in favor of or unfavorably towards any gender, group, creed or religion. Justice and fairness will be the guiding principles governing every decision related to this Policy. All employees are responsible to uphold the spirit of the policy, embrace commitment to Sasken values and act to ensure compliance and avoid violations. Wherever there is any inadequacy in this Policy vis-à-vis the law laid down by the State or the Court, the latter will prevail over the Policy of Sasken.
2. Sexual Harassment at workplace in any form shall not be permitted or tolerated or condoned by the company whether it is based on a person's race, colour, ethnic or national origin, gender, real or suspected sexual orientation, religion or perceived religious affiliation, disability or other personal characteristics. The use of company property including email, notice board or document as a vehicle for sexual harassment is prohibited.

Definition:

- 2.1 Harassment refers to behavior which is not welcome, and which is personally intimidating, hostile or offensive. Harassment may occur even when there was no intention of causing offence. The key in deciding whether harassment has occurred depends on whether the behavior was acceptable by normal standards, how the behavior is perceived by the victim/aggrieved and the impact hence caused
- 2.2 Behaviors that are deemed to be bullying and or harassing include targeting a person/s, rumor mongering, discriminatory and unfair treatment, undermining a person/s, use of harsh and unparliamentarily language, undermining one's self-esteem among others. This may occur in person and/or over any electronic communication such as phone/email.
- 2.3 Sexual harassment has been defined generally as including unwelcome sexual advances, requests for sexual favors and other verbal or physical conduct of a sexual nature, whenever: (1) submission to the conduct is either an explicit or implicit term or condition of employment; (2) an employee's reaction to the conduct is used as a basis for employment decisions affecting that employee; or (3) the conduct has the purpose or effect of interfering with the employee's work performance or (4) creating an intimidating, hostile or offensive working environment.
- 2.4 While sexual harassment is a form of harassment, the other forms of harassment include offensive behavior or any physical or verbal conduct demonstrating hostility toward a person because of his or her age, race, color, religion, national origin, disability or any other act or behavior
- 2.5 Some Examples of offensive behavior include-
 - i. Behaving intimately with another employee irrespective of the gender
 - ii. Making subtle remarks on good looks
 - iii. Making lewd remarks
 - iv. Teasing based on cultural differences/background
 - v. Display of affection at workplace as part of office romance
 - vi. Any unwanted attention or remark that is perceived as offensive by another employee or team
 - vii. Retaliation for having raised a complaint
 - viii. Behaviors masked as fun



- 2.6 Retaliation is when a complainant suffers a negative impact at work after having reported/witnessed/ participated in prevention of sexual harassment. Complainant can suffer poor appraisal / threats/isolation. Retaliation is harassment in itself and will be treated the same way as harassment. Cases of retaliation must be reported and if proved, the retaliator may even be transferred or terminated from employment
- 2.7 In instances of sexual harassment, it is essential to remember that it is not the intention of the perpetrator that is the key in deciding whether harassment has occurred but whether the behavior is unacceptable by normal standards, how the behavior is perceived by the victim/aggrieved and the impact hence caused.
- 2.8 **Non Disparagement:** In instances of Sexual harassment, you undertake to refrain from making any negative or disparaging statements (orally or in writing) about Sasken or its stockholders, directors, officers, employees, products, services or business practices, at any point of time for any publication in the print media, internet, blog or in any other media and shall further refrain from urging or influencing any person to make any such statement or engage in any conduct, which goes against the interest of Sasken, in any manner. This covenant shall survive & continue in perpetuity and shall be binding on the Employee, at all times.

3. Types of Sexual Harassment

- 3.1 Sexual Harassment behavior can be either of the following types
- Quid Pro Quo: Sexual favors in exchange for providing favorable treatment related to work assignments.
 - Hostile Environment: Any unwelcome physical, verbal or non-verbal conduct of a sexual/coercive nature that intimidate any employee/interferes with an employee's work.
- 3.2 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-
- Implied or explicit promise of preferential treatment in her employment; or
 - Implied or explicit threat of detrimental treatment in her employment; or
 - Implied or explicit threat about her present or future employment status; or
 - Interference with her work or creating an intimidating or offensive or hostile work environment for her; or
 - Humiliating treatment likely to affect her health or safety.
- 3.3 Sexual harassment should not be confused with simple friendly behavior or with more intimate exchanges if these are desired and accepted. The difference between the friendly behavior and sexual harassment is that sexual harassment is neither solicited nor accepted by the recipient, it is unwelcome or imposed.

4. Categorisation of Unwelcome sexually determined behavior(s)

Sexual Harassment includes such unwelcome sexually determined behavior(s) which can be categorized as:

- Physical

- Sexually suggestive physical contact
- Display of exhibitionist characteristics
- Coerced acts of Sexual nature

-Verbal/Written

- A demand or request or subtle pressure for sexual favors
- Sexually colored remark
- Sexually oriented verbal kidding, teasing, joking
- Graphic or degrading comments of a sexual nature about an individual on his/ her appearance



- Any statement or action that offends the modesty of a woman
- Verbal abuse of a sexual nature
- Non-Verbal
 - Showing pornographic material through any media
 - Repeated offensive sexual flirtations, advances or propositions
 - Display of sexually suggestive objects or pictures
 - Insulting looks or gestures or sounds
 - Derogatory written material of a sexual nature

-Any other unwelcome physical, verbal or non-verbal conduct of a sexual nature in any media

5. Who is a Victim/Aggrieved? Who is a Harasser? Where can an incident of /Sexual Harassment occur?

5.1 Who is a victim/aggrieved?

- Employees across global locations
- Contractors
- Consultants
- Trainees employed/ engaged by Sasken
- Customers/Clients
- Job Applicant
- Service providers
- Vendors
- Business visitors
- Any other third parties with whom the company has business dealings.
- Anyone who witnesses an offensive behavior and is affected by it

5.2 Who is a Harasser?

- An employee, contractor, consultant, trainee or guest who is on full time or part time engagement with Sasken
- May or may not be from the opposite gender
- May not have a wrong intent
- May be unaware that behavior is offensive or unlawful

5.3 Where can it occur?

- It includes any place visited by the employee(s) arising out of or during the course of employment as part of work.
- Whilst at work, and/or whilst present at Company events, training course (residential or otherwise) and/ or While being present on the company premises / or in onsite location.
- Whilst using company provided/personal communication facilities such as computers and telephone
- While on travel to and from workplace or when two or more employees are on travel away from workplace on official work.
- While being on excursion with coworkers
- While working from home

6. Effects of /Sexual Harassment

On the Aggrieved

- Reduced Performance
- Absenteeism
- Resignation from employment
- Stress
- Psychological problems
- Withdrawal/Suicidal tendencies

On the Company



- Decreased Performance
- Increased Attrition/Absenteeism
- Affects Reputation and Goodwill

7. Reporting of Sexual Harassment

7.1 Importance of reporting Sexual Harassment

- To stop unfair treatment
- To create a fair and non-offensive environment at workplace for self and others.
- Any such instances left unchecked can lead to further issues.
- To book the culprit

7.2 Role of a victim/aggrieved in an incident of Sexual Harassment

- As a victim/aggrieved, you are strongly encouraged / expected to tell the harasser to STOP his/her offensive behavior without fear.
- Do not fall into the trap of self-doubt and self-denial.
- Raise the grievance to Internal Committee for redressing Sexual Harassment.
- Separate Internal committee formed in Pune, Kolkata and Chennai locations besides Bangalore location. The location specific internal committee IDs are as follows : Bangalore (ic-blr@sasken.com), Kolkata(ic-kol@sasken.com), Pune (ic-pune@sasken.com), Chennai (ic-chn@sasken.com)
- Do not publicize the matter.

7.3 Role of a witness in an incident of Sexual Harassment

- As a witness you can raise a complaint without fear.
- Also, if the victim/aggrieved feels hesitant to raise a complaint, you as a witness may direct the victim/aggrieved to the company policy or to the right channel to raise a complaint ensuring complete confidentiality in the matter.
- As a witness of Sexual Harassment, you can commit to give evidence and be examined / cross examined.

7.4 Responsibility of an employee

- Understand and comply with the policy of the Company on Sexual Harassment at workplace
- Avoid all inappropriate behaviors at workplace and maintain your dignity and uphold the value of 'Respect for Individual'
- In the event of a complaint heard/witnessed related to Sexual Harassment
 - Make sure any complaint you have heard/witnessed is raised through appropriate channels without fear. A witness can report such an incident once he/she is authorized by the victim.
 - Listen, empathize, encourage and provide support to the victim/aggrieved
 - Maintain confidentiality
- In the event you are a victim/aggrieved of Sexual Harassment
 - Avoid self-blame and tolerance
 - Express your concerns first time and raise a complaint at the earliest
- Even if the victim/aggrieved does not want to file a case and does not want you to file a case, you have a responsibility towards the organization and can report the matter, however maintaining confidentiality and remaining neutral at all times, and cooperating with the investigation process if so desired.



- It is important to bring any perceived Sexual Harassment case to the notice of the Redressal Committee or HR at the earliest.

8. Grievance Redressal

8.1 All grievances pertaining to Sexual Harassment would be evaluated by Sexual Harassment Redressal Committee called Internal Committee (IC) and would be treated seriously and sensitively, having due regard to fairness, confidentiality and privacy of all parties concerned (Refer ASHWGL1 and ASHWPR for more details). All grievances pertaining to Harassment (if not in the scope of Sexual Harassment) would be evaluated as per the Disciplinary policy of Sasken. While the misconduct covered by Prevention of Sexual Harassment is covered by this Policy and the related process, the disciplinary actions arising out of the Sexual Harassment or Harassment shall follow the Disciplinary Policy.

Grievances relating to Sexual Harassment:

- 8.2 Grievances would be handled in a time bound manner. The aggrieved should raise concerns as early as possible after the incident has occurred.
- 8.3 If the complaint has been proved, action will be taken against the alleged offender. The punitive action can range from a warning to termination from employment. When the complaint is not proved, no action will be taken against the respondent. If it is proved that the complaint is a deliberate attempt to malign a person, then punitive action will be taken against the complainant, which may include termination of employment. It can even lead to Sasken handing over the case to the relevant law enforcing agencies.
- 8.4 If the resolution of the issue takes more than one meeting, until the matter is fully examined and decided upon by the Sexual Harassment Committee, neither party to the complaint shall (a) commit the same or similar act, (2) publicize the existence of the case and (c) the person who is alleged to have committed the Sexual Harassment should refrain from any kind of intimidation/revenge against the complainant.
- 8.5 All concerned are expected to participate in the grievance resolution process in good faith.
- 8.6 Sasken reserves the right to share the information pertaining to a case with the relevant law enforcing authorities under any court order/notice.

9. Sexual Harassment at a Third-Party Location or Host Country

- 9.1 If anyone at customer site or anyone in Sasken team at customer site commits an act of Sexual Harassment, then, to the extent it was done by customer's personnel, it has to be handled under customer's Sexual Harassment rules. To the extent it was committed by Sasken employee it can be examined by Sasken, under its policy.
- 9.2 In case a third-party policy does not exist, then the case would be handled under the jurisdiction of the prevalent sexual harassment law of the country.
- 9.3 In countries where this policy is not aligned with the host country specific laws and regulations, the host country specific laws and regulations will apply.
10. If any statute is enacted and notified to provide protection against sexual harassment of **women** at workplace and for the prevention and redressal of complaints of sexual harassment and matters connected therewith, the provisions as contained in this policy shall be subject to the provisions in the said Act and Rules there under



11. For more details on the committee members, their roles and responsibilities, obligations of management, penalties of harassment, process to address /sexual harassment at workplace/third party, refer ASHWGL1 and ASHWPR.

Definition of Terms:

Term / Abbreviation	Definition / Expansion
CE - AW / Complainant	The person making the complaint Complainant Employee/Aggrieved woman: Refers to any woman employee (as per section 2(a) of SHWW Act) who has lodged a complaint of sexual harassment at workplace and has been subjected to any act of sexual harassment by another employee (hereinafter referred to as 'respondent').
Respondent / RE	Refers to any employee against whom the complaint of sexual harassment has been lodged.
IC	Internal Committee constituted in accordance with the provisions of this policy read with SHWW Act and Rules thereunder.
Sexual Harassment	<p>As a broad guideline, sexual harassment includes such unwelcome sexually determined behavior as:</p> <ul style="list-style-type: none"> • Physical contact • A demand or request for sexual favors • Sexually colored remarks • Showing pornography • Any other unwelcome physical, verbal or non-verbal conduct of a sexual nature <p>Sexual harassment has been defined generally as including unwelcome sexual advances, requests for sexual favors and other verbal or physical conduct of a sexual nature, whenever: (1) submission to the conduct is either an explicit or implicit term or condition of employment; (2) an employee's reaction to the conduct is used as a basis for employment decisions affecting that employee; or (3) the conduct has the purpose or effect of interfering with the employee's work performance or creating an intimidating, hostile or offensive working environment.</p>
Act	Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and rules thereunder (SHWW Act)
Management	Management means Company's Managing Director/Director/Manager or such other officer or Officers/nominee or nominees as may be authorized in this behalf by the Managing Director/Director and notified in the Notice Board of the establishment and also includes disciplinary authority and Appellate Authority as notified under the service rules or the certified standing orders as applicable.
Workplace	Workplace refers to all the offices of the company and includes departments, branches situated anywhere in India. It also includes any place visited by the employees arising out of or during the course of employment including transportation provided by the Management of the establishment for undertaking the journey, the places where the employees of the company have met for social, sports or



	extracurricular activities organized by the company. For further clarity and details refer to the clause (O) Sec.2 of the SHWW Act.
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Administrative Information:

1. The Company reserves the right to amend, abrogate, modify and / or rescind the policy or any part thereof at any time.
2. The Policy will be reviewed once in 2 years or subject to any change due to a business context or change in legislation/judgment whichever is earlier.
3. For any exigent scenarios, an exception to the policy can be raised in Iken -> MyApps -> Exception Portal
4. For conflicts in interpretation of the policy, the decision of the HR head would be final

Approved By:

Global Head-HR

Revision History

Version	Approval Date	Amendment Description	Author(s)	Change ref. (Process Change Request No.)
1.0	24-Oct-02	New policy created	Priya A Batra	PCR 1202
2.0	7-Aug-06	Inclusion of redressal committee members and changes incorporated in the policy	V Charumathi	PCR 1993
3.0	16-Oct-06	Change in Scope of policy and modification in the Redressal committee members list	Shilpi Pandey	PCR 2061
4.0	14-Mar-07	modification in the Redressal committee members list	Shilpi Pandey	PCR2206
5.0	14-Jul-09	Modification in the Redressal committee members list. Changes in the scope. Incorporated. Clause on cases when complaint not proved is incorporated	Susan Thomas	PCR 2710
6.0	29-Mar-10	Scope enlarged to include global locations. Change in committee members. Included other prohibited forms of harassment. Included case of SH at customer site.	Susan Thomas	PCR 2889
6.0	31-Aug-10	Change in US Committee members	Susan Thomas	PCR 3111
7.0	31-Mar-11	Removal of Mexico members. Change in US members	Susan Thomas	PCR 3259
8.0	29-Jul-11	2 additional clauses on the description to sexual harassment behavior Change in India legal member.	Susan Thomas	PCR 3406



9.0	24-May-12	Revising the policy to detail definition, types, categories, effects, role, reporting Harassment/Sexual Harassment. Changes in Pune, US, Japan and China members. Committee member list to be removed from policy and included as a guideline.	Susan Thomas	PCR 3646
10.0	1 May 2013	Yearly review done. No change to policy	Susan Thomas	NA
11.0	13 Aug 2013	Added behaviour “masked as fun” to the list of offensive behaviors. Clarification on where harassment can occur, timelines for reporting and witness reporting based on authorization. Revised admin information and included employee responsibility on upholding the spirit of the policy	Hema Makani/ Susan Thomas	PCR 3928, 3934
12.0	01-Jul-14	Revision in policy based on Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 has come in to force w.e.f. 9.12.2013	Susan Thomas	PCR 4224
13.0	23-Sep-16	Yearly review done. New clause on work place bullying added.	Sneha Singh	PCR 4564
14.0	27-Mar-18	Change in committee reference to IC (Internal Committee) and the id for raising a complaint from ombudsmen@sasken.com to InternalCommittee@sasken.com . Clause added on the possible punitive actions if the complaint is proved. Actions arising out of misconduct relating to Sexual Harassment and Harassment to follow Discipline policy. Clause on non-disparagement is added.	Susan Thomas	PCR 4859
14.1	20-Oct-19	Reference to LEAP values added	Susan Thomas	PCR 5093
14.2	01-Jun-23	Policy scope redefined to include only “Sexual Harassment” and removed “Harassment “ from the scope of the policy Included WFH under the scope of where an SH can occur. Raising the grievance must be to Internal committee. Removed the acronyms of LEAP and IRISE reference.	Susan Thomas	PCR 5558
14.2	01-Jul-25	Annual Review Done. No changes	Susan Thomas	PCR 6009
Recipients of Change Notification				
Target Audience		E-mail ID (or the means of notification)		
All employees of Sasken Technologies Limited, its branches and subsidiaries globally		allusers@sasken.com		

