

Policy for Prevention of Sexual Harassment

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1. Objective

Expleo India is committed to providing a workplace which discourages any type of sexual harassment and a framework to deal with such incidents swiftly and effectively; providing a work atmosphere that is free of any kind of discrimination.

2. Scope

This policy is applicable to all allegations made against all Employees (as defined herein), irrespective of whether sexual harassment is alleged to have taken place within or outside Company premises. The policy is also applicable to sexual harassment to a third party within the Company Premises by an Employee, and sexual harassment by a third party to an Employee within the Company Premises.

Employee for the purpose of this policy covers all full-time employees, employees on temporary assignments (Trainees/Retainers/Contract) including third party agencies and persons employed through facility management service providers and as defined under Section 2 (e) and (f) of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (hereafter referred to as Act).

Company Premises for the purpose of this policy shall include, any place visited by the employee arising out of or during employment including transportation provided by the Company for undertaking such journey.

3. What Constitutes Sexual Harassment?

3.1 Sexual harassment includes but is not limited to the following.

3.1.1 Unwelcome sexual advances, demand or requests for sexual favors, and other verbal, non-verbal, and physical conduct of a sexual nature as defined under the Act.

3.1.2 The conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile, or offensive working environment.

3.2 This conduct includes but is not limited to.

3.2.1 Unwanted physical contact or conduct of any kind, including sexual flirtations, touching, advances, or propositions.

3.2.2 Verbal harassment of a sexual nature, such as lewd comments, sexual jokes or references, and offensive personal references or such other sexually colored remarks.

3.2.3 Demeaning, insulting, intimidating, or sexually suggestive comments (oral or written) about an individual’s personal appearance or electronically transmitted messages.

3.2.4 The display in the workplace of demeaning, insulting, intimidating, or sexually suggestive objects, pictures, photographs, etc., and showing pornography of any kind.

3.3 Sexual harassment can also be.

3.3.1 Quid Pro Quo (this for that) Harassment: "Quid Pro Quo" harassment is situations when there could be the solicitation of sexual favors in exchange for some type of employment decision by Managers, Supervisors, or those in Authority over the woman leading to a hostile working environment.

3.3.2 Quid Pro Quo Harassment also includes Detrimental Treatment and Humiliating Treatment: Any implied or explicit threat of detrimental treatment in employment and humiliating treatment for rejection of sexual advances which is likely to affect the safety or health of a person covered under this policy is also considered to be sexual harassment and is prohibited.

3.4 Sexually harassing or offensive conduct in the workplace, whether committed by supervisors, managers, non-supervisory employees, or non-employees, is prohibited.

4. Implementation of the Policy

To help ensure a fair, expeditious, and proper implementation of the Policy, and resolve all the related issues, a body known as 'Sexual Harassment Prevention & General Harassment Prevention Enforcement Committee' ("**the Committee**") also known as Internal Complaints Committee (ICC), shall be constituted and presided over by a Management nominated Senior Lady Employee of the Organization and will also comprise of a person from an NGO and is an expert on issues relating to Gender and Sexual harassment.

The list of the committee members is displayed on Notice Boards.

5. Procedure for reporting Harassment and Action

Reports/complaints of harassment can be made to the HR Head or can be sent to the following email id – POSH-India@expleogroup.com

Factual details of harassment along with approximate timeline would need to be provided. The complaint should be sent within three (3) months of the incident, and in case of a series of incidents, within a period of three months from the date of the last incident. The period of three months may be extended (for reasons to be recorded in writing) in case the Committee is satisfied that the circumstances were such that it prevented the person from filing the complaint within the period of three months. Any employee utilizing the complaint procedure will be treated with great sensitivity.

The Company has constituted an Internal Committee as required under the Act. The Committee shall lay down its procedures with reference to an enquiry in consonance with the provisions of the Act.

6. Consequences of Policy Violation

Any employee, supervisor, or manager who is found to have violated the harassment policy will be subject to appropriate disciplinary action, up to and including termination. Sexual harassment is construed to be misconduct under the rules of employment of the Company. The Company prohibits any form of retaliation against employees for bringing bona fide complaints or providing information about harassment. However, if an investigation of a complaint shows that the complaint or information was false, the individual who provided the false information will be subject to disciplinary action, up to and including termination.

7. Responsibility of the Employees

Any employee who believes that a supervisor's, manager's or other employee's actions or words constitute unwelcome harassment has a responsibility to report or complain about the situation at the earliest.

EXPLEO makes it mandatory for all employees and other persons to ensure that their behavior is not contrary to this Policy.

All employees and other persons involved in the operations of the company are encouraged to reinforce the maintenance of a work environment free from Sexual Harassment.

The employees involved in the investigation should cooperate with the procedure and provide all information required, failure to which may be dealt with the disciplinary procedure.

8. Responsibility of Expleo

It is the duty of EXPLEO Management to ensure the effective implementation of this policy all throughout the company thereby creating a culture of equality and non-discrimination.

EXPLEO will provide adequate awareness about the policy for all its employees at the time of HR Induction and external committee members will give awareness sessions on every year.

EXPLEO reserves the right to investigate and resolve a complaint of sexual harassment regardless of whether the victim ultimately desires EXPLEO to pursue the complaint.

Moreover, EXPLEO can and will take disciplinary action if it determines that conduct that does not meet this policy's definitions is unprofessional, inappropriate, or otherwise warrants discipline.

Policy Revision History

Revision	Change Information	Prepared By	Reviewed By	Approved By	Approved Date
1.0	Initial Release	Sachin D & Manjunath C	Rajesh Kumaraswamy	Roopa Rajesh	1-Sep-22
2.0	Multiple email id mentioned in the document removed & maintained only one Email id.	Sachin D & Manjunath C	Rajesh Kumaraswamy	Roopa Rajesh	1-Sep-23