

**Policy on Prevention, Prohibition and Redressal of Sexual Harassment of Women at the Workplace - PoSH policy**

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## **I. INTRODUCTION**

This Policy shall be called “Policy on Prevention, Prohibition and Redressal of Sexual Harassment of Women at the Workplace” (referred to as in “Policy” hereinafter) and has been framed in accordance with the provisions of “The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013” and rules framed thereunder (hereinafter “the Act”). Accordingly, while the Policy covers all the key aspects of the Act, for any further clarification reference shall always be made to the Act and the provisions of the Act shall prevail. If any aspect relating to sexual harassment not explicitly covered in this Policy is provided for by the law, then the law will be applicable. In case of any conflict between the Policy and the law, the law will prevail.

Sexual Harassment results in violation of the fundamental rights of a woman to equality under Articles 14 and 15 of the Constitution of India and her right to life and to live with dignity under Article 21 of the Constitution and right to practice any profession or to carry on any occupation, trade or business which includes a right to a safe environment free from Sexual Harassment.

Keeping the above in mind, the organisation has formulated this, Policy. All employees are required to be aware of this Policy and to note the consequences of non-compliance.

## **II. CORE PRINCIPLE**

The organisation is an equal opportunity employer; it is hence our endeavour to create a conducive, fair and harmonious environment amongst its employees and in the organisation. The employees have the right to work in an environment, free from all forms of discrimination and conduct, which can be considered harassing, coercive, or disruptive, including Sexual Harassment. The organisation recognizes its responsibility towards safeguarding and protecting its employees, from harassment either by an internal or external source and is committed to provide and ensure a safe, harassment-free working environment to all its women employees.

## **III. APPLICABILITY**

This Policy is applicable to all persons employed with 360 ONE and its group companies (present or future) within India, for any work on regular, temporary, ad hoc or daily wage basis, either directly or through an agent, including a contractor, with or, without the knowledge of the organisation, whether for remuneration or not, or working on a voluntary basis or otherwise, whether the terms of employment are express or implied and includes a co-worker, a contract worker, associate, probationer, trainee, and apprentice or called by any other such name.

The Policy shall also be applicable to all third parties such as visitors, clients, customers, service providers, and any other person authorized to be present within the workplace of the

organisation. For example, guests or candidates coming for interviews, meetings, events, programs, or guests coming in for meeting etc.

While this Policy explicitly protects aggrieved women, it provides other genders with a redressal mechanism to plead their case in the event of a malicious complaint. It provides all persons an equal opportunity to be heard in line with the principles of Natural Justice. In case of complaints received from other genders the same will be handled under the Employee Grievance Redressal policy. Please refer to the Employee Grievance Redressal policy to know the process of accepting and redressing sexual harassment complaints by other genders.

360 ONE has offices in countries outside India. Local country laws will take precedence over this Policy, in other geographies, where applicable.

This Policy will be reviewed and updated from time to time to ensure that it is current. All updates and revisions to the Policy will be approved by the Board of Directors (Board) of the Company or its delegated IC of the Company.

All such amendments to the Policy shall be recorded in in the “Document Change Control” section.

#### IV. DEFINITIONS

Key terms	Definitions
<b>Employee</b>	Means a person employed at a workplace for any work on regular, temporary, ad hoc or daily wages basis, either directly or through an agent, including a contractor, with or without the knowledge of the principal employer, whether for remuneration or not, or working on a voluntary basis or whether the terms of employment are expressed or implied and includes a co-worker, a contract worker, probationer, trainee, apprentice or called by any other such name.
<b>Employer</b>	Means a person responsible for management, supervision and control of the workplace. In 360 ONE, Employer means the Chief Human Resources Officer (CHRO)
<b>Workplace</b>	Shall mean all places where any Company activity is carried out. It shall include: <ul style="list-style-type: none"> <li>• All offices or other premises where Company business is conducted.</li> <li>• All Company related activities performed at any other site.</li> <li>• Any social, business, or other functions where the conduct or comments may have an adverse impact on the workplace or workplace relations.</li> </ul>

	<ul style="list-style-type: none"> <li>• An alleged act of Sexual Harassment committed during or outside of office hours using any mode of communication including electronic communication.</li> <li>• Any Sexual Harassment on any social networking website during or outside of office hour.</li> <li>• Any place visited by employee or arising out of or during employment with Company, including transport services if provided by Company for undertaking such journey.</li> </ul>
<b>Aggrieved woman</b>	Means, a woman of any age at any 360 ONE or its group company location, whether employed or not, who alleges to have been subjected to any act of Sexual Harassment, by the person against whom the Aggrieved woman has made a complaint.
<b>Respondent</b>	An individual or a group of individuals against whom the Sexual Harassment complaint has been made under this Policy.
<b>Complainant</b>	Means an individual who makes a complaint on behalf of the aggrieved woman if she is unable to make a complaint on account of her physical or mental incapacity or death or otherwise. The complaint can be filed by the aggrieved woman's legal heir, or such other person as may be prescribed may make a complaint to the Internal Committee.
<b>Company</b>	Means '360 ONE WAM Limited', in short '360 ONE' and its group companies (present or future) within India.
<b>Internal Complaints Committee</b>	Means a committee to inquire and advice suitable action on the complaints on Sexual Harassment (hereinafter referred to as the "IC").
<b>Presiding officer / Chairperson</b>	Means a woman employed at a senior level at the workplace amongst the employees.
<b>Act</b>	Means the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal), Act, 2013, and the Sexual Harassment (Prevention, Prohibition and Redressal) Rules, 2013 issued there under (the "Rules") collectively.

## V. WHAT CONSTITUTES SEXUAL HARASSMENT

Sexual Harassment would include any physical or verbal behaviour and any form of communication that has unnecessary, improper, or unwelcome sexual connotations. It may consist of, but not be limited to, any of the following:

1. unwanted physical, verbal, or visual sexual advances
2. requests and demand for sexual favours

3. innuendos, hints, and suggestions of a sexual nature
4. actual sexual assault
5. comments with sexual overtones, sex-related jokes or insults or sexually coloured remarks
6. unwelcome graphic comments about a person's body made in their presence or otherwise, or directed toward them
7. unwelcome and inappropriate inquiries about a person's sex life
8. unwelcome whistling or gestures directed at a person or group of persons
9. touching or brushing against any part of the body
10. physical confinement against any part of the body
11. physical confinement against one's will and any other act likely to violate one's privacy
12. sexually oriented conduct which is offensive or objectionable to the recipient, including, but not limited to: epithets, derogatory or suggestive comments, slurs or gestures and offensive posters, cartoons, pictures, or drawings, email messages or SMS/ MMS or WhatsApp messages and / or videos etc.

## **VI. CIRCUMSTANCES FOR SEXUAL HARASSMENT**

In addition, the following circumstances, among others, may amount to Sexual Harassment if they occur or are present in relation to or connected with any act or behaviour of Sexual Harassment

1. implied or explicit promise of preferential treatment in employment
2. implied or explicit threat of detrimental treatment in employment
3. implied or explicit threat about present or future employment status
4. interference with work or creating an intimidating or offensive or hostile work environment
5. humiliating treatment likely to affect health or safety

Unwelcome sexual advances (either verbal or physical), requests for favours and other verbal or physical conduct of a sexual nature constitute Sexual Harassment when:

1. submission to such conduct is either an explicit or implicit term or condition of employment (e.g., promotion, training, timekeeping, or overtime assignments)
2. submission to or rejection of the conduct is used as a basis for making employment decisions (hiring, promotion, termination)
3. the conduct has the purpose or effect of interfering with an individual's work performance or creating an intimidating, hostile, or offensive work environment
4. Sexual favouritism exists where a person who is in a position of authority rewards only those who respond to his/her sexual advances, whilst other deserving employees who do not submit themselves to any sexual advances are denied promotions, merit rating or salary increases.

## **VII. INTERNAL COMMITTEE CONSTITUTION AND ITS ROLE**

While all employee(s) should adhere to decent behaviour and should not engage in any of the activities and behaviours stipulated above, in the unlikely event of any employee violating the same, the Redressal System is as follows:

### **1. Constitution of IC**

- a. Presiding Officer: The presiding officer must be a woman employed at a senior level in the Company.

Provided that in case a senior level woman employee is not available, the Presiding Officer shall be nominated from other offices or administrative units of the workplace;

Provided further that in case the other offices or administrative units of the workplace do not have a senior level woman employee, the Presiding Officer shall be nominated from any other workplace of the same employer or other department or organisation;

- b. Internal Members: At least 2 IC members must be selected from among the employees who are committed to the cause of women or who have had the experience of social work or have legal knowledge.
- c. External Member: The external member of the IC has to be selected from non-governmental organizations (NGO) or associations committed to the cause of women or a person familiar with the issues relating to sexual harassment.
- d. 50% Women: At Least one-half of the total members nominated to the IC must be women.
- e. The list of IC Members is available at all times on My Adrenaline – HRMS platform of the organization.

### **2. Email Facility:**

To enable easy access to the Committee, a dedicated email ID has been set up for receiving complaints under this Policy i.e., [posh@360.one](mailto:posh@360.one). Alternatively, you can file a complaint with our Ethics Helpline using any of the reporting channels listed below:

Reporting channel	Contact information
Phone	1800 202 5242
Email	<a href="mailto:360one@ethicshelpline.in">360one@ethicshelpline.in</a>
Web Portal	<a href="http://www.360one.ethicshelpline.in">www.360one.ethicshelpline.in</a>
Chatbot	<a href="http://www.360one.ethicshelpline.in">www.360one.ethicshelpline.in</a>
Post Box	P. O. Box No 71, DLF Phase 1, Qutub Enclave, Gurgaon - 122002, Haryana, India

### 3. Tenure of IC:

- a. Members of the IC will hold office for a period of 3 years, from the date of their nomination.
- b. A member of the IC may resign at any time by tendering his or her resignation in writing to the Company.
- c. The Presiding Officer or any other member of the IC who is an employee shall automatically vacate his or her office upon ceasing to be an employee of the Company or after completion of the stipulated tenure of 3 years.

### 4. Removal or Replacement of IC member or Presiding Officer:

The Presiding Officer or member as the case may be, shall be removed from the IC in the event he/she:

- a. contravenes any provisions of the Policy; or
- b. has been convicted for an offence or an inquiry into an offence under any law for the time being in force is pending against him / her; or
- c. has been found guilty in any disciplinary proceedings or a disciplinary proceeding is pending against him / her; or
- d. has so abused his / her position as to render his / her continuance in office prejudicial to public interest and
- e. Any vacancy created due to cessation of employment, resignation, death, disability or removal, as applicable, shall be filled by a fresh nomination by the Company in accordance with the appropriate guidelines.

### 5. Scope of IC:

- a. To receive complaints of Sexual Harassment at the workplace
- b. To initiate and conduct inquiry as per the established procedure as stated in this policy document and applicable under the Act
- c. To recommend the appropriate actions including punitive/corrective actions to the Employer
- d. Coordinating with the Employer in implementing appropriate action
- e. Maintaining strict confidentiality throughout the process
- f. Submitting annual reports in the prescribed format
- g. To create policies/awareness that seek to discourage and prevent Sexual Harassment in the workplace
- h. Publicize the policy framework effectively
- i. Organize workshops and awareness programs at regular intervals for sensitizing the employees with the provisions of the Act and orientation programs for the IC members in the manner as may be prescribed in the Act.

While dealing with the complaint, IC will ensure strict confidentiality to the extent possible, and all information shall be restricted to the concerned members only.

### **VIII. COMPLAINTS AND REDRESSAL PROCEDURE**

#### **1. Lodging a complaint:**

- a. Any Aggrieved woman may make, in writing (initiated by an e-mail to the dedicated email ID) a complaint of Sexual Harassment at workplace to the IC, within a period of 03 (Three) months from the date of incident and in case of a series of incidents, within a period of three months from the date of last incident.
- b. The IC, at its discretion, can extend the time limit for receiving a complaint to another period of 03 (Three) months if it is satisfied that the circumstances were such which prevented the Aggrieved woman from filing a complaint within the first 03 (Three) months. IC will record the reasons for such extension of 03 (Three) months in writing.
- c. The Aggrieved woman should provide (if possible) as many specific details as possible including incidents, dates and people that are involved in their complaint. Details with respect to the following may be provided while filing a complaint:
  - i. the alleged event, matter or issue that is subject to the complaint (time/date/place etc.)
  - ii. the name and details of the Employee (Respondent) against whom the complaint is being filed

- iii. names and addresses of the witnesses (if any)
  - iv. details of documentary evidence (if any) such as WhatsApp chat records, SMS, E-mails, CCTV Footage, Audio/Video recording etc. and
  - v. any additional information, documentation, or other evidence available to support the complaint (if any).
- d. In case the Aggrieved woman is not able to register complaint due to any physical incapacity, complaint can be registered with written consent from the Aggrieved person either by
- i. a relative or a friend or
  - ii. a co-worker or
  - iii. an officer of the National Commission for Women or State Women's Commission or
  - iv. by any person who has knowledge of the incident
- e. In case the Aggrieved woman is unable to make a complaint on account of mental incapacity, a complaint may be filed by
- i. a relative or a friend or a co-worker
  - ii. a special educator or
  - iii. a qualified psychiatrist or psychologist; or
  - iv. the guardian or authority under whose care the Aggrieved woman is receiving treatment or care; or
  - v. any person who has knowledge of the incident jointly with any of the above.
- f. Where the Aggrieved woman is deceased, complaint can be filed by any person who has knowledge of the incident with written consent of the legal heir of the Aggrieved woman.

## **2. Conciliation**

- a. IC may, before initiating an inquiry and at the request of the Aggrieved woman, take steps to settle the matter between Aggrieved woman and the Respondent. Where a settlement is arrived, no further inquiry shall be conducted by the IC, provided that, no monetary settlement shall be made as a basis of conciliation.
- b. Where the IC is informed that any term or condition of the settlement has not been complied with, the IC shall proceed to make an inquiry or forward the complaint to the police.

### **3. Interim relief**

During pendency of the inquiry, on a written request made by the Aggrieved woman, the IC may recommend to the employer to:

- a. Transfer the Aggrieved woman or the Respondent to any other department, role, 360 ONE company or city;
- b. Grant leave to the Aggrieved woman of maximum 3 months, in addition to the leave she would be otherwise entitled;
- c. Prevent the Respondent from assessing Aggrieved woman's work performance or writing her confidential report and assign the same to another employee;
- d. Grant such other relief as may be appropriate;

Once the recommendations of interim relief are implemented, the same is informed to the committee.

### **4. Procedure for conducting inquiry**

- a. On receipt of the complaint, the IC shall send copy of the complaint received from the Aggrieved woman to the Respondent within a period of 07 (Seven) working days.
- b. If the complaint has been received on email, the IC Presiding Officer shall forward the same to the Respondent, with clear instructions that the same is not to be shared with anyone and strict confidentiality has to be maintained.
- c. The Respondent shall file the reply to the complaint along with list of documents and names and addresses of witnesses (if any), within a period of 10 (Ten) working days from the date of receipt of the documents.
- d. If the Aggrieved woman or the Respondent desires any witness/es to be called, they shall communicate in writing to IC the names of witness/es whom they propose to call.
- e. If the Aggrieved woman desires to tender any documents by way of evidence before the IC, they shall supply copies of such documents. Similarly, if Respondent desires to tender any documents in evidence before IC, they shall supply copies of such documents. Both shall affix their signature on the respective documents to certify these to be authentic documents.

- f. For making an inquiry under the POSH Act 2013, the IC shall have the same powers as are vested in a Civil Court under the Code of Civil Procedure, 1908, namely:
  - i. Summoning and enforcing the attendance of any person and examining him on oath;
  - ii. Requiring the discovery and production of documents; and
  - iii. Any other matter which may be necessary.
  
- g. IC shall have the right to terminate the inquiry proceedings or to give an ex-parte decision on the complaint, if the Aggrieved woman or Respondent fails, without sufficient cause, to present themselves, for 03 (Three) consecutive hearings convened by the Presiding Officer. However, before such termination or the ex-parte order, the IC shall serve a notice in writing to the party / parties, 15 (Fifteen) days in advance.
  
- h. IC shall notify in writing, the time and dates of its meetings to the Aggrieved woman, the Respondent and witnesses.
  
- i. The meetings with the Aggrieved woman and the Respondent, will be held by the IC at a convenient 360 ONE company's location or at any location decided by the IC for such meeting.
  
- j. All inquiry proceedings will be documented in detail and treated as strictly confidential with restricted viewing only on need-to-know basis.
  
- k. The inquiry proceedings and the statement of witnesses shall be endorsed by the persons concerned and IC to confirm their authenticity.
  
- l. The Aggrieved woman and Respondent shall not be allowed to bring in any legal practitioner to represent them in their case at any stage of the proceedings before the IC.
  
- m. IC shall complete the inquiry within reasonable period but not beyond 90 (Ninety) days and a final report with a set of recommendations if the allegations are substantiated or if it's a false or malicious complaint be submitted to the Employer within ten days thereafter. Such report will also be made available to the concerned parties i.e., aggrieved woman and respondent.
  
- n. The Employer is obliged to act on the recommendations within 60 days from receiving the final report from the IC.

## **5. Punishment**

- a. Complaint unsubstantiated - Where the committee arrives at the conclusion that the allegation against the Respondent has not been proved, it recommends to the Employer that no action is required to be taken in this matter. Further, the committee ensures that both parties understand that the matter has been fully investigated, that the matter is concluded.
- b. Complaint substantiated - Where the committee arrives at the conclusion that the allegation against the Respondent has been proved, it recommends to the employer to take necessary action for Sexual Harassment as misconduct, in accordance with the applicable service rules and policies, and this may include:
  - i. Disciplinary action including obtaining written apology, reprimand, warning, censure;  
Withholding of promotion/ pay raise/ increment;
  - ii. Termination of employment;
  - iii. Suspension;
  - iv. Counselling;
  - v. Community service;
  - vi. Or any other action that the employer may deem fit.

The IC shall recommend to the Employer to deduct salary from the Respondent such sum as it may consider appropriate to be paid to the Aggrieved Woman or to her legal heirs.

For the purpose of determining the sums to be paid to the Aggrieved Woman, the IC shall have regard to:

- i. Mental Trauma, pain, suffering, and emotional distress caused;
- ii. Medical expenses incurred;
- iii. The loss of career opportunity;
- iv. The income and financial status of Respondent.
- v. feasibility of such payment in lump sum or in instalments.

## **IX. PROHIBITION OF PUBLICATION OR MAKING KNOWN CONTENTS OF COMPLAINT AND INQUIRY PROCEEDINGS**

The contents of the complaint, identity and addresses of the aggrieved woman, respondent and witnesses, any information relating to conciliation and inquiry proceedings, recommendations

of the IC and the action taken by the management shall not be published, communicated or made known to general employees, public, press and media in any manner.

**Exception:** Dissemination of information regarding the justice secured without disclosure of any information that may lead to identification including but not limited to name, address, identity and particulars of aggrieved woman, respondent or witnesses.

#### **X. MALICIOUS / FRIVOLOUS COMPLAINTS**

1. This PoSH Policy shall not be misused to bring malicious or frivolous charges against fellow employees.
2. If the IC arrives at the conclusion that the allegation against the Respondent is malicious or the Aggrieved woman or any other person making the complaint has made the complaint knowing it to be false or the Aggrieved woman has produced any forged or misleading document, it may recommend the Company to take appropriate action against the Aggrieved woman or Complainant as the case may be, including obtaining a written apology, warning, reprimand or censure, withholding of promotion, withholding of pay rise or increments, terminating the Aggrieved woman from service or undergoing a counseling session or carrying out community service.

#### **XI. PROTECTION AGAINST RETALIATION**

Retaliation is a serious violation of the PoSH Policy. Any person who engages in such retaliation against the Aggrieved woman or Complainant, directly or indirectly, or encourages others to do so, may be subject to appropriate disciplinary action.

1. The Company will ensure that the Aggrieved woman or witnesses are not victimized or discriminated in any manner while dealing with complaints of Sexual Harassment.
2. This Policy seeks to encourage all employees to express freely, responsibly, and in an orderly way opinions and feelings about any problem or complaint of Sexual Harassment.
3. Persons who retaliate in the form of, intimidation, pressure to withdraw the case, threats for reporting, testifying or participating in the proceedings, should be reported to the IC immediately.

#### **XII. APPEAL**

1. Any party not satisfied or further aggrieved by the implementation or non-implementation of recommendations made, may appeal to 360 ONE's Managing Director & CEO, within 90 (Ninety) days of the recommendations being communicated.
2. The Managing Director & CEO shall decide on the Appeal after hearing the matter within a period of 01 (One) month, from the date of filing of Appeal and make a final decision as deemed fit.
3. Even after the above, if the person Aggrieved is still dissatisfied, it may approach a local Civil Court of relevant jurisdiction for further redressal.

### **XIII. CONFIDENTIALITY**

1. All discussions / decisions pertaining to an incident of Sexual Harassment must be kept confidential. Therefore, contents of the complaint made, the identity and addresses of the Aggrieved woman, Respondent and witnesses, any information relating to conciliation and inquiry proceedings, inquiry report including recommendations of the IC and action taken on the Respondent shall not be published, communicated, or made known to the public, press and media in any manner.
2. All individuals who are part of the IC inquiry will need to sign a confidentiality undertaking, the format of which will be decided upon by the IC.
3. Strict consequences including but not limited to deduction or withholding of salary, permanent or temporary dismissal from the organisation, and other disciplinary measures form part of the consequences in instances when an individual is found to have violated the confidentiality undertaking.
4. Appropriate information will be shared with Government authorities as per the Act.

### **XIV. FILING OF COMPLAINT WITH POLICE**

Nothing in these rules and procedures shall preclude anybody from simultaneously lodging a complaint with the police in respect of any act amounting to an offence under the law. If any assistance is sought, the Company will provide such assistance in this regard.

### **XV. PENAL CONSEQUENCES OF SEXUAL HARASSMENT**

In case the Committee finds the degree of offence coverable under the Indian Penal Code, then this fact shall be mentioned in its report and appropriate action shall be initiated by the employer, for making a Police Complaint.

#### **XVI. AWARENESS AND SENSITIZATION**

1. IC and the Human Resources Department shall be responsible to create and maintain a safe environment that is free of Sexual Harassment.
2. Workshops and awareness programmes shall be organised at regular intervals for sensitizing employees with the provisions of this Policy.
3. Names and phone numbers of members of IC should be published and made easily available to the employees.

#### **XVII. POWER TO CALL FOR INFORMATION AND INSPECTION OF RECORDS**

1. The Appropriate Government i.e., State and Central Government, on being satisfied that it is necessary in the public interest or in the interest of women employees at a workplace to do so, by order in writing,
  - a. call upon any employer to furnish in writing such information relating to Sexual Harassment as it may require.
  - b. authorise any officer to make inspection of the records and workplace in relation to Sexual Harassment, who shall submit a report of such inspection to it within such period as may be specified in the order.
2. Every employer shall produce on demand before the officer making the inspection all information, records and other documents in his custody having a bearing on the subject matter of such inspection.

#### **XVIII. ANNUAL REPORT**

The IC shall in each calendar year prepare, in such format as may be prescribed, an annual report and submit the same to the Employer and the District Officer (as defined in the Act).

The report shall have the following details:

1. Number of complaints received in the year;
2. Number of complaints disposed of during the year;
3. Number of cases pending for more than 90 (Ninety) days;
4. Number of workshops or awareness programmes carried out;
5. Nature of action taken by the Employer.

**XIX. AMENDMENT**

Company may make any alteration or amendment or rescind any of the clauses of this Policy as and when it finds it necessary to do so as long as it complies with the Act. Any such alterations or amendment or rescinding will be intimated to the employee.

### Annexure I

#### **Timelines set out by the law with respect to the inquiry proceedings:**

Submission of complaint (in written form)	Within 3 months of occurrence of last incident.
Notice to the respondent	Within 7 days of receipt of such Complaint
Respondent to respond to the complaint in writing	Within 10 days from the receipt of information regarding complaint from the IC
Completion of inquiry	Within 90 days from receipt of Complaint
Submission of report by IC to Employer and concerned parties	Within 10 days from completion of inquiry
Implementation of recommendations	Within 60 days from receipt of the Final Report
Appeal	Within 90 days from the date of recommendations

### Annexure II

#### **Internal Committee Members:**

<b>Sr. No.</b>	<b>Names</b>	<b>IC capacity</b>	<b>Email ID</b>
1	Ms. Japhia Walker	Presiding Officer	9987618905
2	Ms. Paromita Bhattacharya	Internal Member	9833969965
3	Mr. Niraj Murarka	Internal Member	8879007480
4	Mr. Himadri Chatterjee	Internal Member	9892028282
5	Mr. Sameer Nath	Internal Member	9920066597
6	Ms. Sarika Desai	External Member	9223290796
7	Ms. Laxmi Lobo	External Member	9867930600
8	Dr. Sarika Kulkarni	External Member	9136677448

**Annexure III**

**DO'S & DON'TS for Employees**

<b>DO'S</b>	<b>DON'TS</b>
Read 360 ONE's PoSH policy and procedures dealing with sexual harassment.	Do not indulge in any discussions about alleged instances of sexual harassment or about any of the individuals involved.
If you are being harassed, confront the harasser (if possible) and tell the person to stop the harassment immediately and firmly.	Say "NO" to offensive behavior as soon as it occurs. If it continues, record details of dates, times, places and what happened. Also, note down the names of witnesses of these situations.
Wherever it is feasible, retain records (emails, messages, pictures, audio, video, social media posts, etc) of behavior or incidents that you think may amount to Sexual Harassment.	Do not suppress or delay reporting of instances of sexual harassment.
If you see someone else being sexually harassed, encourage the person to report it or please feel to report it on behalf of the aggrieved woman.	
Be conscious about your behavior and communication, especially on social media platforms - what may seem fun to you may be offensive or harassing to another.	Do not breach confidentiality, as both sides are equally entitled to their privacy.
Cooperate with the IC in its investigation.	
Attend the hearings when summoned by the IC and provide truthful information.	

**DO'S & DON'TS for HR and Managers / Superiors**

<b>DO'S</b>	<b>DON'TS</b>
Ensure that all your team members have been sensitized with PoSH awareness program.	Do not discourage anyone from reporting behavior that they think is sexual harassment.
Highlight the main points from PoSH awareness program during team huddle periodically.	Do not intimidate or retaliate against someone who has complained of sexual harassment. Such behavior may also be grounds for a sexual harassment complaint.

Be approachable, If any employee has any concern, they must feel comfortable discussing the same with you.	Do not handle PoSH cases on your own. IC is the only authority to handle this in right manner.
If anyone draws your attention to incidents of sexual harassment, encourage the person to report such incidents to the IC immediately.	Do not encourage personal conversation even if it's initiated by a female employee.
If you find any sexual harassment issue within team, directly report to IC.	As far as possible, avoid calling female employees after office hours. In case the female employee expresses discomfort, do not call.
Support your employee if they are undergoing inquiry process.	Do not mandate switching on the video post office hours.
	Do not ignore any uncomfortable situation complained by your team member. Direct them to IC immediately.
	Do not draw conclusions without going through the complaints process

### Responsibilities of HR:

1. Be trained to understand and implement the company's sexual harassment policy / service rules (code of conduct) of the organizations.
2. Ensure and assist management to establish company's PoSH policy.
3. HR should ensure that the IC member contact information should be put up in conspicuous places in the office premises.
4. Providing continuous trainings on awareness to employees, as well as leadership, can help create a culture of respect and understanding.
5. It is important to recognize that anyone, regardless of their position or status, can be a victim of sexual harassment. HR should ensure that reports of sexual harassment are taken seriously and treated with sensitivity and confidentiality.
6. Creating a fearless environment where employees feel safe to report incidents of sexual harassment is crucial. This includes addressing the fear of retaliation and ensuring that employees who report sexual harassment are protected from any form of retaliation.
7. Should be proactive in addressing and preventing sexual harassment, rather than being reactive. This can include regularly checking in with employees and seeking feedback on the company's policies and practices.
8. It is important for HR to be aware of their legal responsibilities when it comes to addressing and preventing sexual harassment. This can include implementing the

recommendations of IC in terms of taking appropriate disciplinary action when necessary.

9. Be highly sensitive to the nature of such complaints and encourage employees to report to PoSH IC and intimate IC about the complaint.
10. Ensure not to disclose / discuss with the aggrieved women's / respondent's reporting manager/ HOD or any other person.

#### Annexure IV

##### **List of 360 ONE Group Companies in India:**

1. 360 ONE ASSET MANAGEMENT LIMITED
2. 360 ONE ASSET TRUSTEE LIMITED
3. 360 ONE DISTRIBUTION SERVICES LIMITED
4. 360 ONE FOUNDATION
5. 360 ONE INVESTMENT ADVISER & TRUSTEE SERVICES LTD
6. 360 ONE PORTFOLIO MANAGERS LIMITED
7. 360 ONE PRIME LIMITED
8. 360 ONE WAM LIMITED
9. MAVM ANGELS NETWORK PRIVATE LIMITED
10. 360 ONE ALTERNATES ASSET MANAGEMENT LIMITED