

SOFTSOL INDIA LIMITED
POLICY ON PREVENTION OF SEXUAL HARASSMENT AT WORKPLACE

1. Commitment

Our Company is committed to provide a work environment that ensures every employee is treated with dignity and respect and afforded equitable treatment. The Company is also committed to promote a work environment that is conducive to the professional growth of its employees and encourages equality of opportunity. The Company will not tolerate any form of sexual harassment and is committed to take all necessary steps to ensure that its employees are not subjected to any form of harassment.

2. Scope

"This policy applies to all categories of employees of the Company, including permanent management and workmen, temporaries, trainees and employees on contract at its workplace. The Company will not tolerate sexual harassment, if engaged in by clients or any other business associates.

The workplace includes: office premises or other premises where the Company's business is conducted.

3. What is Sexual Harassment?

Sexual harassment may be one or a series of incidents involving unwelcoming sexually determined behavior as physical contacts and advances, sexually coloured remarks, showing pornography and sexual demands, whether by words or actions.

Sexual Harassment at the workplace includes:

- (i) physical contact and advances or
- (ii) demand or request for sexual favours, or
- (iii) Making sexual coloured remarks or
- (iv) Showing pornography or
- (v) Any other unwelcome physical, verbal or non verbal conduct of sexual nature.

If you are being harassed:

- a) Tell the accused that his/her behavior is unwelcome and ask him/her to stop.
- b) Keep a record of incidents (dates, times, locations, possible witness, what happened, your response). It is not mandatory to have a record of events to file a complaint, but a record can



strengthen your case and help you remember the details over time, in case the complaint is not filed immediately.

c) File a complaint as soon as possible. If, after asking the accused to stop his/her behavior, the harassment continues, report the abuse to the Complaints Committee ('CC') formed for this purpose.

4. Responsibilities regarding Sexual Harassment

All employees of the Company have a personal responsibility to ensure that their behavior is not contrary to this policy. All employees are encouraged to reinforce the maintenance of a work environment free from sexual harassment.

5. Complaints Committee

The Company has instituted a Complaints Committee for redressal of sexual harassment complaint (made by the victim) and for ensuring time bound treatment of such complaints.

The Complaints Committee shall have at least one half of its members as women. Presently the Complaints Committee comprises of the following members:

- a) Ms. Nagamani Yerneni - Chairman**
- b) Mr. Srinivas Rao Bellam - Member**
- c) Mr. Ravi Badugu - Member**
- d) Ms. Padmavathi Vemulapalli - Advocate - Member (outsider)**

The Complaints Committee shall be responsible for:

- 1) Investigating every formal written complaint of sexual harassment
- 2) Taking appropriate remedial measures to respond to any substantiated allegations of sexual harassment
- 3) Discouraging and preventing employment-related sexual harassment.

6. Procedures for Resolution, Settlement or Prosecution of Acts of Sexual Harassment:

A. Manner of Complaint of Sexual Harassment

(i) Any aggrieved woman may make, in writing, a complaint of sexual harassment at workplace to the Complaints Committee ('Committee') within a period of 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.



Provided that where such complaint cannot be made in writing, the Chairperson or any Member of the Committee, as the case may be, shall render all reasonable assistance to the woman for making the complaint in writing.

Provided further that the Committee for the reasons to be recorded in writing, extend the time limit not exceeding three months, if it is satisfied that the circumstances were such which prevented the woman from filing a complaint within the said period.

(ii) Where the aggrieved woman is unable to make a complaint on account of her physical or mental incapacity or otherwise, her legal heir or such other person as may be prescribed may make a complaint under this section.

B. Conciliation

(i) The Committee may, before initiating any inquiry and at the request of the aggrieved woman take steps to settle the matter between her and the respondent through conciliation. Provided that no monetary settlement shall be made as a basis of conciliation.

(ii) Where a settlement has been arrived at, the Committee shall record the settlement so arrived and forward the same to the Board of Directors to take necessary action in this regard.

(iii) The Committee shall provide the copies of the settlement as recorded to the aggrieved woman and the respondent.

(iv) Where a settlement is arrived at, no further inquiry shall be conducted by the Committee.

Provided that where the aggrieved woman informs the Committee, as the case may be, that any term or condition of the settlement arrived at has not been complied with by the respondent, the Committee shall proceed to make an inquiry into the complaint or, as the case may be, forward the complaint to the police.

C. Inquiry into Complaint

(i) The Chairperson of the Committee will proceed to determine whether the allegations (assuming them to be true only for the purpose of this determination) made in the complaint fall under the purview of Sexual Harassment, preferably within 30 days from receipt of the complaint. In the event, the allegation does not fall under the purview of Sexual Harassment or the allegation does not constitute an offence of Sexual Harassment, he will record this finding with reasons and communicate the same to the complainant.

(ii) If the Chairperson of the Committee determines that the allegations constitute an act of sexual harassment, he will proceed to investigate the allegation with the assistance of the Committee members.



