

POLICY ON PREVENTION OF SEXUAL HARASSMENT OF EMPLOYEES IN THE WORKPLACE

THE POLICY

Institutional Investor Advisory Services India Limited (IiAS), is an equal employment opportunity company and is committed to creating a healthy working environment that enables employees to work without fear of prejudice, gender bias and sexual harassment. The Company also believes that all employees have the right to be treated with dignity. Sexual harassment at the work place or other than work place, if involving employees is a grave offence and is, therefore, punishable.

The Company will not tolerate discriminatory or inappropriate conduct by its employees in the workplace. All conduct that can be described as sexual harassment in the workplace will result in disciplinary action, upto and including immediate dismissal from service. Conversely, in case a complaint under this policy is found to be false, the Complainant shall be liable for similar disciplinary action.

This policy is compliant with The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act 2013. Any changes made subsequently to the Act will supersede the provisions of this policy. In the event of any inconsistency between this policy and the Act, the provisions of the Act shall prevail.

The management shall provide all necessary assistance for the purpose of ensuring full, effective and speedy implementation of this policy.

All complaints received under this policy, and their corresponding redressal mechanisms will remain confidential. The Company will, however, make all necessary disclosures to the Police or any other regulatory authority, if required to do so by Indian law.

SCOPE AND EFFECTIVE DATE

- This Policy extends to all employees of the Company and is deemed to be incorporated in the service conditions of all employees and comes into effect immediately.
- For the purpose of this policy:
 - “Employee” means any person on the rolls of the Company including those on deputation, contract, temporary, part time or working as consultants.
 - “Workplace” includes IiAS’s corporate office and all other locations where employees have to visit on work including the mode of transport provided by the Company, if any, to undertake the journey.
- The unwanted nature of sexual harassment distinguishes it from behavior that is welcome and mutual. Sexual harassment may include, but is not limited to, any of the following:

- (a) Physical contact or advances of a sexual nature which includes all unwanted physical contact; or
- (b) A demand or request for sexual favours, which includes, but is not limited to:
 - Sexual favoritism 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.
 - Any act or conduct by a person in authority which renders the environment at workplace hostile or intimidating to a person belonging to the other sex; or
- (c) Making sexually-colored remarks including, but not limited to, unwelcome innuendoes and taunts, suggestions and hints, sexual advances, comments with sexual overtones, sex-related jokes or insults, or unwelcome graphic comments about a person's body made in their presence or directed toward them, unwelcome and inappropriate inquiries about a person's sex life, unwelcome whistling or making of any other sounds directed at a person or group of persons; or
- (d) Showing pornography, including emails containing graphic pictures or videos or any other form of display of sexually explicit pictures and objects; or
- (e) Any other unwelcome physical, verbal or non-verbal conduct of sexual nature, including any other pervasive pattern of behavior which makes employees uncomfortable, insecure or feel humiliated or disadvantaged on the basis of gender differentiation.

INTERNAL COMPLAINTS COMMITTEE

IiAS has constituted an Internal Complaints Committee (ICC) to consider and redress complaints of Sexual Harassment. The constitution of the ICC is given below:

Role	Name	Contact points	Status of the ICC member
Presiding Officer:	Ms. Hetal Dalal	hetal.dalal@iias.in; +91 22 61235514	Employee, Chief Operating Officer
Member	Mr. Amit Tandon	amit.tandon@iias.in; +91 22 61235504	Employee, Chief Executive Officer and Founder Director
Member	Ms. Nupur Jalan	nupur.jalan@iias.in; +91 22 61235507	Employee, Analyst
Member	Ms. Tina Vajpeyi	tina_vajpeyi@yahoo.co.in	Financial Consultant: Centre for Advancement of Philanthropy and ex CFO of The Akanksha Foundation

Every member of the ICC will hold office for a period of 3 years. Their nominations will be automatically renewed for another period of 3 years, except in cases where a member has

expressed his or her desire to resign from the ICC, or has resigned as an employee of the Company.

A quorum of 3 members is required to be present for the proceedings to take place. The quorum shall comprise of 3 members - the Presiding Officer and 2 more members. In the event that the Presiding Officer is unavailable, one of the other women members shall act as interim Presiding Officer.

In case any member of the ICC is a complainant or a respondent in an incident of sexual harassment, he or she will step down as a member of the ICC immediately, till the complaint has been redressed. The remaining members of the ICC will nominate a person to be replace the resigned member, who will hold office till the relevant complaint and inquiry is either redressed or disposed of.

COMPLAINT AND INQUIRY MECHANISM

The table below outlines the process and timelines within which the complaint and inquiry mechanism will be implemented:

Step	Action	Time Line
Step 1.0	Any employee who feels and is being sexually harassed directly or indirectly, must submit a written complaint to any member of the ICC.	In case of a single incident, within 3 months from the date of the incident; in case of a series of incidents, within 3 months from the date of the last incident.
Step 2.0	At the request of the aggrieved employee, the ICC may take steps to settle the matter through conciliation.	Within 10 working days of the complaint being filed
Step 2.1	Where settlement has been arrived at through conciliation (as stated in Step 2.0), the ICC will make a record of such conciliation and send it to both the complainant and the respondent	Within 30 days of the complaint being filed
Step 3.0	Where there is no request for conciliation by the aggrieved employee, ICC will initiate and complete the inquiry. The inquiry process will ensure that both parties, the complainant and the respondent, are given ample and equal opportunity to be heard by the ICC.	Inquiry to be completed within 90 days of the complaint being filed
Step 4.0	ICC will submit the report of the findings and recommendation of the inquiry to both parties and the IiAS management for implementation.	Within 10 days of the completion of the inquiry
Step 5.0	IiAS management to implement the recommendation of the ICC. In case ICC finds the degree of offence coverable	Within 60 days of the receipt of recommendation from the ICC or such

Step	Action	Time Line
	under the Indian Penal Code, then this fact shall be mentioned in its report and appropriate action shall be initiated by the Management for making a Police Complaint.	other timeframe as may be prescribed by law

During the pendency of the inquiry process, the ICC may, upon receiving a written request, recommend the Company to allow the complainant or the respondent to work from another workplace, grant leave (not exceeding a total of three months, which will be in addition to the annual leave granted by the Company) or any other relief as may be requested.

The ICC may decide ex-parte or terminate the inquiry proceedings if the complainant or the respondent fails to present themselves for three consecutive hearings without sufficient cause. Prior to passing an ex-parte order, the ICC will give prior written notice of fifteen days to the concerned party.

No lawyer or any other legal practitioner will be allowed to attend the proceedings of the ICC. Complainants and respondents are not eligible to bring legal representation to the ICC proceedings.

OTHER CONSIDERATIONS

Email correspondence, for the purpose of this policy, will be construed as written communication.

The ICC will maintain a register logging all complaints and redressals under this policy. This register may be maintained electronically.

MORE GUIDANCE

Employees may refer to [The Handbook on Sexual Harassment of Women at Workplace \(Prevention, Prohibition and Redressal\) Act, 2013](#) published by Ministry of Women and Child Development, Government of India, in November 2015.

ABOUT THIS POLICY

This policy replaces IiAS' earlier 'Policy on sexual harassment of employees in the workplace' dated December 2014 and January 2016, and is effective immediately.