

QUESS

WINNING TOGETHER

Prevention of Sexual Harassment Policy

1. Introduction

Quess Corp Limited (formerly IKYA Human Capital Solutions Limited) (the “Company”) 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 or racial bias and sexual harassment. The Company believes that all employees of the Company have the right to be treated with dignity. The Company does not tolerate any behavior that is detrimental to a healthy working environment.

Following the enactment of THE SEXUAL HARASSMENT OF WOMEN AT WORKPLACE (PREVENTION, PROHIBITION AND REDRESSAL) ACT, 2013 by the Government of India, Ministry of Law and Justice on 9th December 2013, sexual harassment of employees occurring in the workplace is an offence and is, therefore, punishable.

The Company will respond promptly to complaints of sexual harassment and where it is determined that such inappropriate conduct has occurred, prompt and appropriate corrective action by conducting an enquiry as is necessary, including disciplinary action, will be taken in accordance with the relevant Service Rules and the Company Policy

2. Scope

This Policy applies to all employees of the Company in India and other geographies. Employee shall mean all individuals on full-time or Part-Time, with Permanent, Probationary, Trainee, Retainer, Temporary or Contractual Appointment with the Company, subsidiaries and JVs.

If a business location or region has policies, practices, laws, or regulations that require more than what is stated in this Policy, then the Employees must follow this policy as a minimum and comply with such policies, practices, laws, or regulations in that particular region/country.

Business units and locations are responsible for ensuring that their location-specific policies and practices are consistent and in compliance with this Policy.

The policy is also applicable to any vendor resource working in the company premises, including extended work place.

Sexual harassment includes any unwelcome behavior of a sexual nature that could be reasonably expected to make someone feel offended, humiliated or intimidated.

This may include (but is not restricted to):

- 1.1. An unwelcome physical contact and advance
- 1.2. A request for sexual favors
- 1.3. Unwelcome comments about someone's sex life, physical appearance or clothes.
- 1.4. Leering and ogling
- 1.5. Sexually offensive comments, stories or jokes, obscene messages/MMS/pictures through mail/SMS or messaging app.
- 1.6. Displaying sexually offensive photos, pinups or calendars, reading matter, objects or on clothes
- 1.7. Sexual propositions or continued requests for dates
- 1.8. Physical contact such as touching or fondling, or unnecessary brushing up against someone

1.9. Indecent assault or rape (these are criminal offences).

Further, the following behavior or acts shall also amount to Sexual Harassment

- Implied or explicit promise of preferential treatment in her/his employment, or
- Implied or explicit threat of detrimental treatment in her/his employment, or
- Implied or explicit threat about her/his present or future employment status, or
- Interference with her/his work or creating an intimidating or offensive or hostile work environment for her/him, or
- Humiliating treatment likely to affect her/his health or safety

3. Procedure

- a. Any employee, who feels he/she is being sexually harassed directly or indirectly, may give a written complaint of the alleged incident to any member of the Committee (table below) within (3) three months of the occurrence of the incident.
- b. Complaints may be made in writing and submitted to the members of the committee via handwritten letter or e-mail. An e-mail id speakup@quesscorp.com has been set up for this purpose. Alternatively, employees can also reach out to the Local Committee.
- c. In cases where the IC receives anonymous complaints, the IC will encourage the complainant to identify themselves. If the complainant does not do so, then there will be no action taken. This applies only to cases of Sexual harassment.
- d. The IC will hold a meeting with the Complainant within (5) five days of the receipt of the written complaint. The IC shall send a copy of the written complaint/ email to the respondent within seven days of receiving the complaint. The respondent will have to share his response /explanation to the IC within ten days of receiving the complaint. At the first meeting, the Committee members shall hear the aggrieved party and record her/his signed statements. The aggrieved party can also submit any corroborative material with documentary proof, oral or written material, etc., to substantiate his/her complaint. In the event that the aggrieved party cannot make the complaint/statement for reasons including death, poor health, or medical rest then a relative may make the complaint / statement on the behalf of the employee.
- e. Thereafter, the person against whom the complaint is made shall be called for a deposition before the Committee and an opportunity will be given to him/her to give an explanation and his/her statement shall be recorded and signed. Thereafter the IC shall furnish a report documenting its findings and recommendations to the employer, within 10 (ten) days from the date of completion of the enquiry. This report shall be shared with both the concerned parties. The IC shall ensure that the enquiry concludes within 90days from the date of filing or as modified by law thereafter.
- f. In the event the allegations are proven, then the IC recommendations to the employer shall include (but not belimited to):
 - Action for sexual harassment as misconduct as defined in the policy, if not then Section 509 IPC shall be applicable
 - Deduction from the salary for the respondent such sum as, the IC may consider appropriate and suchsum shall be paid to the aggrieved party or a legal heir.

4. Working from home guidelines

This clause is particularly focused on acting as guidelines in work from home scenarios. While we go about doing our duties as employees and managers of employees must remain conscious the WFH scenario can blur lines between the home and the workplace.

The Prevention of Sexual Harassment Act 2013 and in our POSH policy, 'workplace' is defined as "any place visited by the employee arising out of or during the course of employment, including transportation provided by the employer for undertaking such a journey". Hence when employees work from home, the residence becomes the place of employment and the same policy is applicable.

Keeping this in mind, it is important that every employee, strictly adheres to the guidelines given below, breaking which the disciplinary action can be taken under the POSH policy of Quest.

General

- Do not forward or share memes of WFH, especially on attire
- Do not take pictures of video calls for personal use such as sharing with friends and family
- Do not have late night calls or send late night messages – maintain regular office work time as far as possible

On video calls -

- If there is a one on one video call, do not insist on the web cam being turned on
- Do not request to see the home/back ground
- Please do not wear vests or any other revealing clothes
- For video calls – please wear either formals or Business casuals
- Do not wear clothes with any suggestive writing/obscene pictures on them
- Do not discuss the colleagues' appearance, or attire of a colleague and make them uncomfortable.
- Maintain appropriate body posture and body language as you would in a professional setting
- Avoid conversations on gender sensitive topics like division of household chores
- Do not record video calls without the permission of every single participant on the call
- In case you face any situation of sexual harassment or underlying workplace harassment please write to speakup@quesscorp.com or any of the Internal Committee members whose details are given in the POSH policy on PeopleDesk. The same redressal process will be followed via phone calls or video calls.

5. Role of Internal Committee

The Internal Committee (IC) is set up in an organization to act as an Inquiry Authority on a complaint of sexual harassment. The IC comprises of internal panelists - **with a minimum of 50% female members**, and one external representative who has significant experience working with NGOs/other women's organization/familiar with issues relating to sexual harassment.

The roles of the external member of the IC:

1. Be available 1 day each month to review and advise on cases handled by the IC of Quest and its subsidiaries and JVs
2. Be available to investigate and review cases and document them. B) Travel to locations in

- case the incidences is deemed critical
3. As per norms be available for a meeting once a quarter.
 4. Prepare reports for Board meetings

6. Punishment

The punishment meted out to the employee confirmed of having committed sexual harassment at the workplace is as per the Company Policy or Indian Penal Code whichever is applicable.

As per the organization policy the punishment may include -

- Oral warning
- Written warning
- Demotion
- Withholding of promotion/salary increment
- Transfer to another location or office
- Suspension
- Termination

The Punishments listed above are for the offences referred herein. It is to be noted that the charged employee may be awarded more or less punishment depending on the unique set of facts that related to his/her case.

In the event, the complaint does not fall under the purview of Sexual Harassment or the complaint does not mean an offence of Sexual Harassment, the same would be dropped after recording the reasons thereof or maybe referred to the concerned person in the Company.

In case, the allegation is found to be true, the Company will direct appropriate action against the respondent in accordance with the recommendation proposed by the Committee. The said recommendation shall be in accordance with the service rules, and the law of the land.

In case the complaint is found to be false, the Complainant shall, if deemed fit, be liable for appropriate disciplinary action as per the pertinent service rules and the law of the land.

In case the aggrieved employee is unwilling to lodge a formal complaint, any colleague with the knowledge of the incident is expected to inform the IC under the Whistle Blower Policy, however the colleague cannot raise a formal complaint with the IC on behalf of the employee. The investigation process, in such cases will follow the procedure listed above.

The IC shall annually compile a list of cases in that year and furnish this report to the employer and the district officer. Further the employer shall incorporate the referred report in its Company Annual Report.

7. Internal Committee Members and Contact Details

Quess Corp Internal Committee - w.e.f 2nd May 2021.

Revised on 10 June 2021

The details of the Internal and External Representatives: Cover all business entities unless specified, are available on the intranet of the Company.