

## PREVENTION OF SEXUAL HARASSMENT POLICY

### **1. Objective of the Policy**

Wipro is committed to the highest standards of openness, probity and accountability. To this extent, we are determined to provide a work environment free from any form of unlawful discrimination and to maintain a workplace where all employees are considered equal and the dignity of each employee is respected and promoted. Any employee who is involved in sexual harassment will be subjected to appropriate disciplinary action.

### **2. Spirit of the Policy**

- a. We strive to promote equality through the prevention, elimination and redressal of discrimination in the form of sexual harassment at the workplace.
- b. Through this policy we aim to:
  - a. Encourage our employees to take an active role in preventing sexual harassment.
  - b. Deter employees from getting involved in any form of sexual harassment.
  - c. Assure all employees that they can rely upon the organization's support in resolving their concerns on any form of sexual harassment at work.

### **3. Prohibition of Sexual Harassment**

- a. Sexual harassment is a form of discrimination that adversely impacts equality at work, dignity and rights of individuals.
- b. Sexual harassment detracts from a productive working environment and can affect the health, confidence, morale and performance of those affected by it, including anyone who witnesses or knows about such unwanted behavior.
- c. Sexual harassment at workplace or extension of workplace is strictly prohibited. Further, any retaliation against an individual who has complained about sexual harassment or has cooperated/participated in an investigation of sexual harassment complaint is prohibited. Additionally, acts that are committed during Work From Home or Working Remote arrangements that are authorized

and/ or mandated by the Organization would fall within the ambit of sexual harassment at the workplace. “Work From Home or Working Remote” here refers to a situation wherein employees are working from a remote location which is not the Organization’s physical premises, client/ vendor premises, or any other location which forms an authorized workplace by the organization. Actions which take place in personal capacity will not be considered workplace concerns unless there is connection with the workplace by way of creation of a hostile work environment for the aggrieved person.

d. This document has a list of behaviors that are unacceptable and may constitute sexual harassment. Such a list is only indicative and not exhaustive, and the behaviors not mentioned in this list may still be considered ‘Sexual harassment’ if it otherwise constitutes ‘sexual harassment’ as per the definition and scope of ‘Sexual harassment’. Also listed is the procedure by which complaints of inappropriate conduct are handled by the organization.

e. While this policy sets forth Wipro’s policy of promoting a workplace free of sexual harassment, it does not limit Company’s authority to discipline or take remedial action for workplace conduct which it deems unacceptable, regardless of whether that conduct satisfies the definition of sexual harassment.

#### **4. Scope of the Policy**

This policy is applicable to all allegations of sexual harassment at the workplace. Workplace includes all those places visited by an employee arising out of or during the course of employment including organization authorized workplace or any other remote location to the extent any workplace related activity takes place from such location. Workplace also includes extended workplace including transportation provided by the Company for undertaking such journey, place of stay and work, venue of work- related events etc., the places visited by the employees for official travel, places visited for office conferences/ offsites etc.

#### **5. Applicability of the Policy**

a. This policy shall be applicable to all employees and also to part-time, temporary, contractual or casual personnel, trainees/interns, persons on probation, employees working with or without remuneration and apprentices while on an engagement with Wipro as well as any other third party whilst working for Wipro in any capacity.

b. Wipro’s customers, vendors, consultants, and anyone else doing business with Wipro or in relationship to any work being carried out on behalf of Wipro must also comply with this policy.

#### **6. Exclusion:**

It is to be noted that this Policy does not apply when the Complainant is performing work of their own

accord and for personal reasons, which has no connection with official work.

## **7. Policy and Procedure for Disclosure, Enquiry and Disciplinary Action**

### **a. What constitutes Harassment?**

Harassment is any unwelcome verbal, non-verbal or physical conduct or advances that is offensive, demeaning, humiliating, derogatory, or any other inappropriate behavior that fails to respect the dignity of an individual.

### **b. What is Sexual Harassment?**

“Sexual harassment” includes any one or more of the following unwelcome acts or behavior (whether directly or by implication) namely:

- a. physical contact and advances; or
- b. a demand or request for sexual favors; or
- c. making sexually colored remarks; or
- d. showing pornography; or
- e. any other unwelcome physical, verbal or non-verbal conduct of sexual nature.

**Explanation:** The following circumstances, among other circumstances, if it occurs or is present in relation to or connected with any act or behaviour of sexual harassment may amount to sexual harassment:

- implied or explicit threat or detrimental treatment in employment; or
- implied or explicit threat about present or future employment status; or
- interference with work or creating an intimidating or offensive or hostile work environment; or
- humiliating treatment likely to affect health or safety.

The legal definition of sexual harassment is broad and in addition to the above examples, other sexually oriented conduct, whether it is intended or not, that is unwelcome and has the effect of creating a work place environment that is hostile, offensive, intimidating, or humiliating to any employee or employees may also constitute sexual harassment.

***(Ref: Some acts which constitute Act of Sexual Harassment are given in Annexure A)\****

## **8. Third Party Harassment:**

- Third party harassment means Sexual Harassment perpetrated by visitors, patrons, vendors, independent contractors, auditors, consultants, and others with whom the Employees have come in contact, directly or indirectly, because of the Organization having a relationship/business relationship with them.
- Where the Sexual Harassment at the Workplace occurs as a result of an act or omission by any third party, the Organization shall take all steps necessary and reasonable to assist the affected Employee in terms of support and preventive action.

## **9. Prevention of Sexual Harassment**

Consistent with the existing law, Company will ensure all reasonable steps for prevention of sexual harassment at work. Such steps will include:

- a. Wide circulation of prevention of sexual harassment policy amongst employees;
- b. Banners and Display boards at various locations informing the employees about POSH Policy;
- c. Establishing an internal complaints committee to respond to sexual harassment complaints as set out below and provide all assistance to the said committee;
- d. Implementation of the findings of the aforesaid complaints committee;

## **10. Prevention of Sexual Harassment Committee:**

Wipro Enterprises Limited has a Prevention of Sexual Harassment Committee or Internal Committee (hereinafter referred to as the "PSHC") constituted at every location to implement and enforce this policy.

In accordance with the legal requirements, the PSHC shall have:

- a. a senior level woman employee as the Presiding Officer;
- b. at least two other employees committed to the cause of women or who have experience in social work or legal knowledge;
- c. a member from a third party / NGO who is adequately conversant with the issue of sexual harassment;

- d. provided that at least half the members shall be women employees;

Each location will have a regional representative, who along with certain central PSHC members will form the location level committee for inquiring into complaints from a Wipro Enterprises Limited office in that region. The members of the PSHC including the Chairperson will be rotated once every three years. Subject to the above, the Company will determine the nature and composition of the committee as it deems appropriate and notify the same to employees.

The following functions are executed by the PSHC:

- i. inquiring into / investigating complaints.
- ii. recommending actions based on investigation and reporting.

#### **Zero Tolerance To Retaliation:**

If an employee feels that he/she is experiencing any kind of retaliation, victimization or discrimination in the nature of intimidation, pressure to withdraw the complaint or threats for reporting, testifying or otherwise participating in the proceedings, he/she should immediately report the matter by sending an email to the dedicated email id [wel.safeworkplace@wipro.com](mailto:wel.safeworkplace@wipro.com).

The Organization prohibits retaliation against any person for raising a complaint or helping in addressing the complaint. Any retaliation or reprisals are subject to immediate corrective action, up to and including termination of services. Alleged retaliation or reprisals are subject to the same complaint procedures and disciplinary action as complaints of Sexual Harassment.

#### **Reporting Sexual Harassment Concern**

Any person falling within the ambit of this policy, who feels s/he has been subjected to sexual harassment (or any other person acting in good faith on his/her behalf) will have the option to seek formal intervention from the PSHC through the following means:

- i. email to [wel.safeworkplace@wipro.com](mailto:wel.safeworkplace@wipro.com)
- ii. contacting any of the PSHC members

Within a period of 3 months from the date of the incident or in case of a series of incidents, the investigation shall be completed by PSHC and the recommendation pursuant to the investigation shall be provided.

Provided that where such complaint cannot be made in writing, any member of the PSHC shall provide all reasonable assistance to the complainant for making the complaint in writing.

Provided further that the PSHC may extend this time limit for another 3 months for reasons given in writing, if it is satisfied that circumstances prevented the complainant from filing within the stipulated period.

***(Ref: Details on PSHC composition is given in Annexure B)\*\****

## **Action on receiving a Complaint**

### **A. Conciliation**

On receipt of a formal complaint, the PSHC will:

- i. At the request of the complainant, attempt to settle the matter between the complainant and respondent through conciliation prior to initiating an inquiry.
- ii. if this is successful, forward the settlement so arrived at to senior management for implementation, and provide copies of the settlement to the parties involved.
- iii. inquire into any complaint by the complainant that the terms and conditions of the settlement arrived at have not been complied with by the respondent or forward the same to the police.

### **B. Inquiry**

- i. An inquiry into a complaint of sexual harassment will be completed within a period of 90 days.
- ii. Such investigation into a complaint will be conducted in such a way as to maintain confidentiality to the extent practical under the circumstances.

In general the PSHC will ensure that the principles of natural justice are adhered to including:

1. giving reasonable opportunity to both parties to be heard as well as taking on record any relevant documents;
2. Upon completion of inquiry providing a report of its findings to both parties thereby enabling them to make a representation against these findings before it;
3. taking all other actions necessary to ensure a fair and equal process including ensuring that neither complainant nor supporting witnesses nor any other person cooperating with the inquiry process is victimized or discriminated in any way.

### C. Actions pending Inquiry

During pendency of an inquiry the PSHC will have discretion to make appropriate interim recommendations upon a written request by the complainant to:

- a. transfer the complainant or respondent to any other workplace; or
- b. Grant leave to the complainant of up to 3 months provided this will be in addition to the leave that the complainant would normally be entitled to;
- c. or grant such other relief to the complainant as may be required in the circumstances of the matter

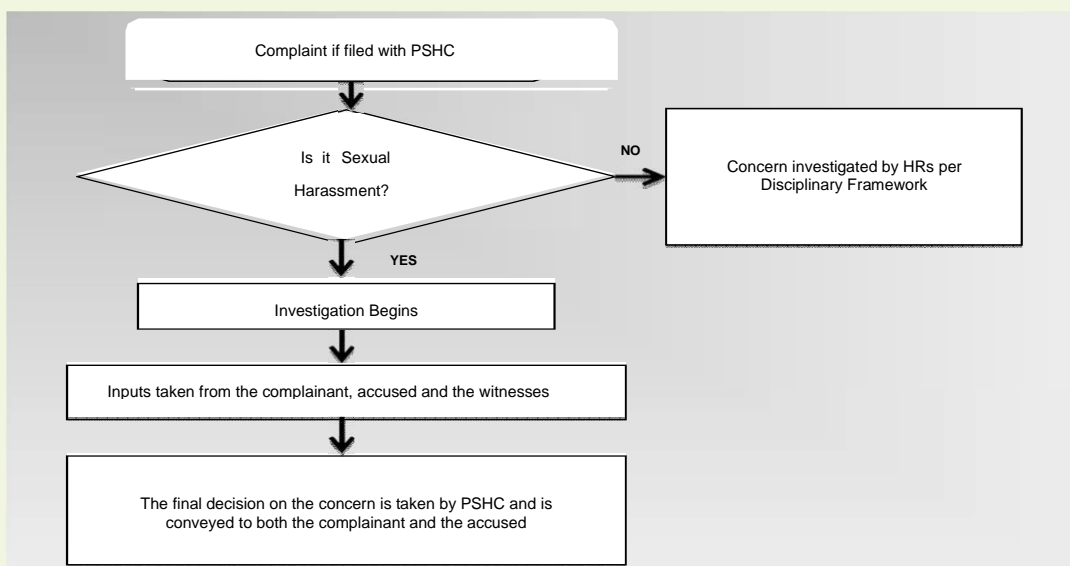
### D. Completion of Inquiry

- a. The PSHC on completion of an inquiry will provide a report of its findings within 10 days from the date of completion to the concerned HR team and management.
- b. Necessary action to be taken within 60 days of receipt of the PSHC's report.

### E. Action in case of False Complaint and Evidences

- a. If after conducting investigations as per the process laid down above, the PSHC finds that the complainant or the witness has made a false or malicious complaint or has produced any forged or misleading document, it may recommend action to be taken against the complainant or the witness.
- b. The PSHC will conduct an enquiry in accordance with the prescribed procedure to establish such malicious intent prior to making any recommendation.
- c. Mere inability to sustain a complaint or to provide adequate proof will not attract action against the complainant.

**Flowchart below gives a summary of grievance addressal procedure once the complaint is filed with PSHC**



## **F. Remedies**

In the event the investigations carried by PSHC confirms an act of sexual harassment against an accused person, PSHC will make such recommendations to Company's management as it deems fit and advice initiation of appropriate disciplinary / remedial action.

## **G. Obligation of employees:**

Pursuant to the preventive steps under this policy, employees should ensure that they:

- Become fully informed about the contents of this policy.
- Co-operate with any measures introduced to promote equal opportunities.
- Respect the sensitivities of others.
- Refrain from taking discriminatory actions or decisions which are contrary to the letter or spirit of this policy.
- Offer information and support to any person who they suspect is being harassed and/or otherwise report any such instance of sexual harassment to the appropriate persons.
- Maintain confidentiality regarding any aspect of an inquiry to which they may be party to. Failure to maintain confidentially as required herein may result in disciplinary action.

Notwithstanding the company's internal procedure, every employee retains the right to file a complaint of unlawful discrimination and harassment under the law of the land with local authorities. If an employee chooses to file such a complaint, Company will provide all reasonable assistance in this regard.

## **H. Obligation of Managers, Supervisors:**

All Managers and Supervisors should ensure that:

- a. They foster a climate free of discrimination in their teams
- b. Those who report to them comply with this policy
- c. They do all that is necessary to ensure that prompt and effective action is taken on any complaint they receive
- d. They do not instruct, induce or attempt to induce or pressurize or otherwise allow other employees to act in breach of this policy
- e. They provide all reasonable assistance to the victim for making a complaint



## **I. Continuous sensitization of employees to issues on prevention of harassment**

In addition to the above, Company will continue to sensitize and train employees on issues concerning the prevention of sexual harassment.

## **J. INQUIRY PROCEDURE:**

- a. The Complainant shall submit/send by e-mail copy of the complaint, supporting documents and list of witnesses to the PSHC.
- b. One copy of the complaint to be sent to Respondent, after receipt of the complaint, within 7 (seven) working days by the PSHC.
- c. The Respondent shall file his/her reply within 10 (ten) working days from the date of receipt of the complaint with his/her list of documents and the list of witnesses.
- d. PSHC shall follow the principles of natural justice during the course of the proceedings.
- e. PSHC may at its discretion conduct the inquiry ex-parte if the Complainant or the Respondent fails without sufficient cause to present themselves for 3 (three) consecutive hearings convened by PSHC. However such ex-parte order may not be passed without giving a notice in writing at least 15 (fifteen) days in advance to the party remaining absent from the proceedings.
- f. No legal practitioner is allowed to be brought by the parties to represent them in their case at any stage of the proceedings before the PSHC.
- g. Minimum of 3 (three) members including Presiding Officer and the external member shall be present while conducting the inquiry.
- h. For the purpose of making an inquiry, the PSHC shall have the limited powers as are vested in a civil court under the Code of Civil Procedure, 1908 when trying a suit in respect of the following matters, namely:
  - a) summoning and enforcing the attendance of any person and examining him/her
  - b) requiring the discovery and production of documents; and
  - c) any other matter as may be prescribed.
- i. While the inquiry/ conciliation proceedings shall ordinarily be conducted face-to-face with the parties and witnesses physically appearing for meetings at the office premises or any other location specified by the PSHC, in certain circumstances, the PSHC may allow the parties or witnesses to appear before it through videoconference or telephonic means. In such situations, the following guidelines shall also be observed:

- a. Videoconference or telephonic proceedings shall be conducted only with the consent of the parties and witnesses involved.
- b. The parties or witnesses who are required to depose before the PSHC shall be given adequate notice of 24 hours to ensure that they have enough time to set up the infrastructure required for taking a video-conference call.
- c. The PSHC members/ parties/ witnesses to any inquiry or conciliation will be bound by the same standards of confidentiality as in the case of face-to-face proceedings. Audio or video recording of proceedings shall not be permitted. The PSHC member/ party/ witness appearing through virtual means must ensure that they are alone in the room when taking the call and that no part of information relating to the proceedings is made known to any unauthorised individual.
- d. Parties/ witnesses will be sent a copy of the minutes of meetings or other relevant documentation (such as inquiry/ findings reports, evidence etc.) via email.
- e. Any and all communication (including but not limited to consent, confirmations, questions, comments, responses, statements) shall be made through email and/ or digital signatures.
- f. In the event that videoconference or telephonic proceedings are not feasible, the PSHC may postpone the same until physical meetings can be conducted.

Wipro is committed to taking care of its employees and is mindful of the impact any inquiry proceeding may have on its participants. Participants of inquiry, especially, complainants and respondents can avail the post inquiry counselling session facilitated by the Company, to lessen the impact of trauma induced by the entire process.

#### **J. INQUIRY REPORT:**

- a. The PSHC shall provide Report of the findings to the Employer and both the parties within a period of ten days from the date of completion of inquiry.
- b. The Employer shall act upon the recommendation within sixty days of the receipt of the findings report.
- c. If the PSHC arrives at the conclusion that the allegation against the Respondent has not been proved, it shall recommend to the Employer that no action is required to be taken.
- d. If the PSHC arrives at the conclusion that the allegation against the Respondent has been proved, it shall recommend to the Employer to, as the case may be:
  - e. take action for Sexual Harassment as a misconduct in accordance with the provisions of this policy; and/ or
  - f. deduct, notwithstanding anything in the service rules applicable to the Respondent, from the salary or wages of the Respondent such sum as it may consider appropriate to be paid to the Complainant or to her legal heirs, as it may determine, in accordance with the provisions of Section

15 of the Act. In the event the Employer is unable to deduct the same or in the event of non-payment of the above mentioned sum by the Respondent, the same shall be recovered in a manner as prescribed under Section 13 of the Act.

**K. PENALTIES:**

**a. Consequences of violation of the Policy:**

Any person found guilty of violating this Policy as substantiated by data and facts, will be subject to any of the below mentioned disciplinary action, leading upto and including termination of services, based on severity of case.

- Written apology
- Warning
- Reprimand or censure
- With-holding of promotion
- With-holding of pay rise or increments
- Terminating of service
- Undergoing a counselling session
- Carrying out community service
- Monetary Compensation

b. Irrespective of and without prejudice to complaints initiated before the PSHC, the Complainant may, at his/her sole discretion, also choose to lodge a complaint for the same offence with the Police. The Respondent shall be subject to any findings or order of any competent authority, including but not limited to, a Court of Law.

**L. APPEAL:**

The Complainant and the Respondent shall have the right to appeal to the Tribunal/Court of appropriate jurisdiction within ninety days of the decision of the PSHC IC if they are not satisfied with the decision of the IC.

**M. LOCAL COMMITTEE:**

- a. If the Employer is unable to recover the amount of compensation from the Respondent, Employer shall forward the Inquiry Report to the District Officer of the Local Committee.
- b. If the Complaint is against the Employer himself, Complaints can be filed before the District Officer of the Local Committee.

**N. FILING OF POLICE COMPLAINTS:**

If the Complainant so desires, the Employer can provide assistance to the Complainant in filing the Complaint with the Police.

**O. SAVINGS:**

- a. The proceedings under this Policy shall be conducted in parallel with the other remedies of law, if such a case arises.
- b. The provisions of this Policy shall not restrict the power of Employer or Complainant to proceed against the Respondent for any other misconduct or to pursue the criminal or civil remedies.

**P. Bystander Intervention:**

A bystander or observer is any employee, who is witnessing an act of sexual harassment, hearing or reading about sexual harassment at workplace. Wipro believes that intermediaries like bystanders/observers can do a lot in holding harassers accountable and lessen the impact of sexual harassment. At Wipro all bystanders have the responsibility to speak up for the aggrieved party. This can be achieved by appealing to an authority, buffering to stop escalation of a situation, calling out or confronting the inappropriate behaviour, by diffusing the situation without harming or causing further distress to the aggrieved party.

***Note: While this is a global policy and process, Wipro Enterprises Limited will comply with any country specific statutes governing the subject matter of this policy.***

## \*Annexure A

### Indicative Acts constituting Acts of Sexual Harassment at Workplace

- Circulation or display of material, written, printed or otherwise that is sexual in nature, sexist, sexually explicit (Objectionable material). Putting of Objectionable material workspace or alongside belongings, or on a computer or fax machine or on the Internet or any other public display system or public place in the work premises;
- Verbal abuse or comments that demean a person because of their sex
- Comments about physical appearance
- Sexually colored remarks
- Discussion of one's partner's sexual inadequacies
- Tales of sexual exploits and encounters
- Intrusive questions about sexual activity
- Graphic descriptions or display of pornography
- Sexually explicit gestures
- Offensive gestures
- Indecent exposure
- Leering
- Unwelcome touching and hugging
- Sexual or physical contact, ranging from kissing or touching to serious assault
- "Accidentally" brushing sexual parts of the body
- Pressing or rubbing up against a victim
- Sexual sneak attacks (such as grabbing private parts on the run)
- Sexist and insulting graffiti
- Lewd and threatening letters
- Sexist jokes and cartoons
- Obscene phone calls, texts, messages

- Insisting that workers wear revealing clothing
- Inappropriate gifts like lingerie, undergarments, sexually explicit literature, objects
- Pressure for dates
- Subtle or overt pressure for sexual favors
- Soliciting or demanding sexual services
- Repeated sexual invitations even when the person invited has refused / ignored such invitations
- Sexual assault
- Coerced sexual intercourse

**\*\* Annexure B Details of Prevention of Sexual Harassment Committee (PSHC/IC) members**

*(Please note the list above is indicative and not exhaustive)*

**PSHC members (Wipro Infrastructure Engineering)**

Name	Location	Region/Factory/ Unit	Contact Number	Email id
Vaneesha Jain	Bangalore	All subsidiaries, business units across Wipro Enterprises Limited	7033446655	<a href="mailto:vaneesha@sashaindia.com">vaneesha@sashaindia.com</a>
Rani Sakthi	Bangalore	All subsidiaries, business units across Wipro Infrastructure Engineering	9940127141	<a href="mailto:rani.sakthi@wipro.com">rani.sakthi@wipro.com</a>
<b>Regional PSHC representatives (Wipro Infrastructure Engineering)</b>				
Smriti K	Bangalore	Peenya, Bangalore	9535644522	<a href="mailto:smriti.k05@wipro.com">smriti.k05@wipro.com</a>
Roopa Rao			7899275831	<a href="mailto:roopa.rao@wipro.com">roopa.rao@wipro.com</a>
Ramakrishna Rao Nulakala	Hindupur	Hindupur CP Plant	8008440330	<a href="mailto:ramakrishna.nulakala@wipro.com">ramakrishna.nulakala@wipro.com</a>
Venugopalreddy M			9110739903	<a href="mailto:mandli.venugopalreddy@wipro.com">mandli.venugopalreddy@wipro.com</a>
Kanthi Kiran			9515122720	<a href="mailto:kanthi.v84@wipro.com">kanthi.v84@wipro.com</a>
Ramakrishna Rao Nulakala	Hindupur	Hindupur CP Plant	8008440330	<a href="mailto:ramakrishna.nulakala@wipro.com">ramakrishna.nulakala@wipro.com</a>
Raviraja Naik			9008328856	<a href="mailto:raviraja.h96@wipro.com">raviraja.h96@wipro.com</a>
Jayarama Reddy A			9686568647	<a href="mailto:jayarama.reddy@wipro.com">jayarama.reddy@wipro.com</a>
Nithya M	Chennai	Chennai C1 Plant	9786913088	<a href="mailto:thanikachalam.r65@wipro.com">thanikachalam.r65@wipro.com</a>
Santhosh Kumar			9751562339	<a href="mailto:santhoshkumar.d@wipro.com">santhoshkumar.d@wipro.com</a>
Subila P	Chennai	Chennai A22 Plant	9843871920	<a href="mailto:subila.p11@wipro.com">subila.p11@wipro.com</a>
Thanikachalam			9176555888	<a href="mailto:thanikachalam.r65@wipro.com">thanikachalam.r65@wipro.com</a>
Hemant Desai	Mumbai	Airoli Office	9920540204	<a href="mailto:hemant.desai@wipro.com">hemant.desai@wipro.com</a>
Samidha More			7738880941	<a href="mailto:samidha.more@wipro.com">samidha.more@wipro.com</a>
Hemant Desai	Mumbai	Bhiwandi Plant	9920540204	<a href="mailto:hemant.desai@wipro.com">hemant.desai@wipro.com</a>
Tushar Kulkarni			9881744636	<a href="mailto:tushar.kulkarni5@wipro.com">tushar.kulkarni5@wipro.com</a>
Arun Raj K	Bangalore	Aerospace Plant 1	9972431178	<a href="mailto:arun.k011@wipro.com">arun.k011@wipro.com</a>
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Maria			9108444420	<a href="mailto:maria.maglineas@wipro.com">maria.maglineas@wipro.com</a>
G Kruthika	Bangalore	Aerospace Plant 2	9741059383	<a href="mailto:g.kruthika@wipro.com">g.kruthika@wipro.com</a>
Krishnappa R			9945079045	<a href="mailto:krishnappa.r55@wipro.com">krishnappa.r55@wipro.com</a>
Sharika Das	Bangalore	3D Plant	9840682054	<a href="mailto:sharika.das1@wipro.com">sharika.das1@wipro.com</a>
Balgopal Tripathy			7978996339	<a href="mailto:balgopal.tripathy@wipro.com">balgopal.tripathy@wipro.com</a>
Mandira R Chowdhury	Bangalore	Koramangala BO	9611100639	<a href="mailto:mandira.roychowdhury@wipro.com">mandira.roychowdhury@wipro.com</a>
Madhavan Shanmugam			9944529942	<a href="mailto:madhavan.shanmugam1@wipro.com">madhavan.shanmugam1@wipro.com</a>
Sumathi Srinath			9980159740	<a href="mailto:sumathi.srinath@wipro.com">sumathi.srinath@wipro.com</a>