





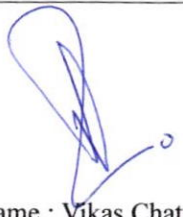
# **Xanadu Prevention of Sexual Harassment at Workplace Policy**



## Document Information and Version Control

Policy Name:	Xanadu Prevention of Sexual Harassment at Workplace Policy
Applicability:	All Xanadu Entities in India
Issue & Effective Date:	01 June 2024
Issuing Authority:	Head - HR
Approver:	CEO

Version	Version Date	Approver for Change	Author	Description for Change
1.00	1 February 2021	NA	Human Resources / Compensation & Benefits	New Policy
1.01	01 June 2023	CEO	Human Resources / Compensation & Benefits	Amendment in ICC team members
1.02	01 June 2024	CEO	Human Resources / Compensation & Benefits	Amendment in ICC team members

 Name : Mangesh Shinde HR	 Name : K N Swaminathan CFO	 Name : Vikas Chaturvedi CEO
Issuing Authority	Verifying Authority	Approving Authority



### **Philosophy:**

At Xanadu, we are committed to providing a work environment that ensures every associate is treated with dignity and respect.

The Company has zero tolerance for any form of harassment and is committed to taking all necessary steps to ensure that its associates are not subjected to any form of harassment.

### **Scope:**

This policy applies to all associates of Xanadu, including any temporary associates and associates on contract including interns at any of Xanadu's workplaces or any other sites/locations where the associates are deployed for business. Xanadu has zero tolerance for harassment & discrimination if engaged in by associates, clients or by vendors or any other business associates connected with Xanadu & its business.

The workplace includes:

- All offices or other premises where Xanadu's conducts its business.
- All company activities performed at any other site away from the company's premises.
- Any social, personal (involving Xanadu Employees) business, or other functions where the conduct or comments may have an adverse impact on the workplace or workplace relations.
- Any other social media platform

### **Definition:**

Harassment is behavior that is unwanted, unreasonable, and offensive to the recipient, which creates an intimidating, hostile or humiliating work environment for any associate such as:

- Making degrading remarks.
- Making gestures that seek to intimidate or malign dignity.
- Engaging in reprisals for having made a complaint.
- Discrediting the person by spreading malicious information, ridiculing the associate for personal belief, humiliating, and/or shouting abuse at the associate.

**"Sexual Harassment"** includes any one or more of the following unwelcome acts or behavior (whether directly or by implication) such as:

- Physical contact and advances; or
- A demand or request for sexual favors; or
- Making sexually colored remarks; or
- Showing pornography or other offensive or derogatory pictures, cartoons, representations, graphics, pamphlets or sayings; or
- Any other unwelcome physical, verbal or non - verbal conduct of sexual nature;

Circumstances that may further be considered as sexual harassment (if they relate to any act or behavior of sexual harassment mentioned above) are as follows:

- implied or explicit promise of preferential treatment in their employment.
- implied or explicit threat of detrimental treatment in their employment
- implied or explicit threat about their present or future employment status
- interfering with their work or creating an intimidating or offensive or hostile work environment
- humiliating treatment likely to affect the health and safety of the aggrieved person.

In addition to the instances mentioned above, any other act or behaviour, that outrages the modesty of an associate, will be considered as harassment.



## Responsibilities, Mechanism & Committee

### Responsibilities Regarding Harassment:

All associates of Xanadu have a personal responsibility to ensure that their behavior is not contrary to the mentioned guidelines and is free from any kind of harassment.

### Complaint Mechanism:

An appropriate complaint mechanism in the form of the “**Internal Complaints Committee**” (ICC) has been created in the Company for time-bound redressal of the complaint made by the victim.

### Internal Complaints Committee:

The Company has instituted an Internal Complaints Committee for redressal and for ensuring time-bound treatment of such complaints. The Internal Complaints Committee comprises the following members as per locations where we operate.

Location – Mumbai Metropolitan Region			
Sr. No	Committee Member Name	Gender	Role
1	Mr. Dipesh Das	Male	Internal Member
2	Ms. Sharon D’Mello	Female	Internal Member: Presiding Officer
3	Mr. Madhur Mittal	Male	Internal Member
4	Ms. Srishti Narayan	Female	Internal Member
5	Mrs. Sharmila Mohapatra	Female	External Member
Location-Pune Region			
Sr. No	Committee Member Name	Gender	Role
1	Ms. Resham Daryani	Female	Internal Member: Presiding Officer
2	Ms. Renuka Thakur	Female	Internal Member
3	Mr. Vivek Singh	Male	Internal Member
4	Mr. Llewellyn Fernandez	Male	Internal Member
5	Ms. Renuka Mukadam	Female	External Member
Location-Bangalore			
Sr. No	Committee Member Name	Gender	Role
1	Ms. Manisha Singh	Female	Internal Member: Presiding Officer
2	Ms. Shruthi MB	Female	Internal Member
3	Mr. Ajay Kumar	Male	Internal Member
4	Mr. Navin Chand	Male	Internal Member
5	Ms. Shreya Govind	Female	External Member

An e-mail at “[speakup@xanadu.in](mailto:speakup@xanadu.in)” which will be received by the above members.



The Complaints Committee is responsible for:

- Investigating every formal written complaint of harassment
- Taking appropriate remedial measures to respond to any substantiated allegations of harassment
- Discouraging and preventing employment-related harassment

**Complaints:**

1. An associate with a harassment concern, may make a formal complaint to any member of ICC, however in case of sexual harassment concern, such complaints need to be made to the Presiding Officer of the ICC only. The complaint should be in writing, preferably within 3 months from the date of occurrence of the alleged incident. The associate is required to disclose the name, department, division, and location they are working in, to enable the Presiding Officer to contact them and take the matter forward.
2. Where the aggrieved associate is unable to make a complaint on account of physical or mental incapacity or death or otherwise, his/her legal heir may make a complaint under this section.
3. The ICC may, before initiating the inquiry, take steps to settle the matter between the complainant and the respondent through conciliation.
4. The Presiding Officer of the ICC 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 harassment, preferably within 30 days from receipt of the complaint.
5. In the event the allegation does not fall under the purview of harassment, or the allegation does not constitute an offence of harassment, the Presiding Officer will record this finding with reasons and communicate the same to the complainant.
6. If the Presiding Officer of the ICC determines that the allegations constitute an act of harassment, she will proceed to investigate the allegation with the assistance of the Complaints Committee.
7. Where such conduct, on the part of the accused, amounts to a specific offence under the law, the Company shall initiate appropriate action in accordance with law by making a complaint with the appropriate authority.
8. The Complaints Committee shall conduct such investigations in a timely manner and shall submit a written report containing the findings and recommendations to the employer and concerned parties within a period of ten days from the date of completion of the inquiry.

Any violation of these guidelines will lead to corrective action which may include any of the following:

- Formal apology
- Counselling
- Written warning to the perpetrator and a copy of it maintained in the associate's file.
- Change of work assignment/transfer for either the perpetrator or the victim.
- Suspension or termination of services of the associate found guilty of the offence.

Making a false complaint of sexual harassment or providing false information regarding the complaint will be considered as a violation of the guidelines.



**Confidentiality:**

The Company understands that it is difficult for the victim to come forward with a complaint of sexual harassment and recognizes the victim's interest in keeping the matter confidential. To protect the interests of the victim, the accused person, and others who may report incidents of sexual harassment, confidentiality will be maintained throughout the investigatory process to the extent practicable and appropriate under the circumstances.

**Access to reports and documents:**

All records of complaints, including contents of meetings, results of investigations, and other relevant material will be kept confidential by the Company except where disclosure is required under disciplinary or other remedial processes.

**Protection to Complainant / Victim:**

The Company is committed to ensuring that no associate who brings forward a harassment concern is subject to any form of reprisal. Any reprisal will be subject to disciplinary action. The Company will ensure that the victim or witnesses are not victimized or discriminated against while dealing with complaints of sexual harassment.

However, anyone who abuses the procedure (for example, by maliciously putting an allegation knowing it to be untrue) will be subject to disciplinary action as mentioned.