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PROHIBITION, PREVENTION AND REDRESSAL OF SEXUAL HARASSMENT OF WOMEN AT THE WORKPLACE (THE “POLICY”)

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CHANGE HISTORY

Version	Date	Author	Description
1.0	01-Dec-11	Namrata Seetharam	Introduced
1.1	01-Jun-12	Namrata Seetharam	Change in members
1.2	01-Jan-14	Namrata Seetharam	Change in Policy based on new law
1.3	01-Jul-14	Namrata Seetharam	Change in Policy based on new law
1.4	01-Apr-15	Namrata Seetharam	Update the member list
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1.9	01-Jul-17	Ruhi Sinha	Modified the member list Logo change
2.0	12-Oct-17	Ruhi Sinha	Modified the Investigation clause by adding interim measures necessary for the protection of the aggrieved
2.1	01-Feb-19	Ruhi Sinha	Modified with new logo and update on the committee members
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2.3	21-Oct-22	Arita Almeida	Modified the contents and update on the committee members

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I. OBJECTIVE AND PURPOSE OF THE POLICY

OnMobile Global Limited (the “**Company**” or “**OnMobile**”) is committed to creating and maintaining a secure work environment where its Employees, agents, vendors and partners can work in an atmosphere free of harassment, exploitation or intimidation whether within the office premises or other locations (all such premises and location to be hereinafter referred to as the “**Workplace**” as defined below in this Policy).

The Company believes in a zero-tolerance Policy for any form of sexual harassment at the Workplace and all allegations of sexual harassment shall be promptly dealt with.

THIS POLICY ONLY SUPPLEMENTS AND DOES NOT PREVENT ANY COMPLAINANT FROM TAKING RECOURSE TO THE LAW OF THE LAND.

Please note that in case of any conflict between this Policy and the local country’s law or OnMobile’s locally established policies, the local country’s law or OnMobile’s locally established policies shall supersede this Policy.

II. WHAT IS SEXUAL HARASSMENT?

Sexual harassment includes, and is not limited to, any one or more of the following unwelcome acts or behavior (whether directly or by implication):

- Physical contact and advances;
- A demand or request for sexual favors;
- Making sexually colored remarks;
- Showing pornography;
- Any other unwelcome physical, verbal or non-verbal conduct of a sexual nature;
- Verbal conduct such as epithets, derogatory jokes or comments, slurs;
- Unwanted sexual advances, invitations, or comments;
- Visual displays such as derogatory and/or sexually-oriented posters, photography;
- Cartoons, drawings, or gestures.

The following may also constitute sexual harassment if it occurs or is present in relation or connected with any act or behavior of sexual harassment as mentioned above:

- 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 Complainant.

What shall be considered is the effect that the conduct of one person has on another rather than whether the behaviour was intentionally offensive or not. Further, not only face to face harassment, but sexual harassment by electronic means, such as by the use of social media shall also constitute sexual harassment. Sexual harassment does not have to be repeated or continuous to be against this Policy.

If any Employee has any questions relating to what constitutes sexual harassment, or if an Employee has any other questions or concerns pertaining to harassment, the same may be addressed to IC@onmobile.com.

III. SCOPE - WHOM DOES THIS POLICY APPLY TO?

This Policy extends to all Employees. Employees include individuals coming to the Workplace for employment or for any other purpose whatsoever, including but not limited to, visitors, vendors, contractual resources, secondees and applies to any alleged act of sexual harassment against persons at Workplace, whether the incident has occurred during or beyond office hours.

This Policy is not limited in scope to geographical location i.e. the Company's offices or branches but includes all such places or locations where professional duties are conducted or at locations which may be visited by an Employee during the course of employment including transportation provided by the company for undertaking such visit.

Where Sexual harassment occurs as a result of an act of commission or omission by any third party at such third party's location, OnMobile will take all steps necessary and reasonable to assist the affected Employee.

IV. WHOM SHOULD YOU COMPLAIN TO?

If an Employee believes that he/she has been sexually harassed (or has information of any harassment), the Employee shall submit a written Complaint to the Internal Committee at IC@onmobile.com. **Please do not write to the HR department as they are mandated to direct all such Complaints to the Internal Committee.**

The Complainant needs to submit a detailed Complaint, along with any documentary evidence available or names of witnesses, to any of the committee members at the Workplace. The Complaint must be lodged within 03 months from the date of incident or last incident if it is a series of incidents or within the timelimes specified by local laws. The Internal Committee can extend the timeline by another 03 months for reasons recorded in writing, if it is satisfied that these reasons prevented the lodging of the Complaint and within the confines of the law. Where a Complaint cannot be made in writing, the presiding officer or any member of the Internal Committee shall render all reasonable assistance to the Complainant to make the Complaint in writing.

V. WHO CAN COMPLAIN?

Any Employee may make in writing a Complaint of sexual harassment at the Workplace to the Internal Committee. If the Employee is unable to lodge the Complaint on account of their death or physical or mental incapacity or for any other reason, their legal heirs, relatives, friends, co-workers or any person with knowledge of the incident may make a Complaint.

Please note that at the request of the Complainant, the Internal Committee may take steps to settle the matter between such Complainant and the Respondent through conciliation but no monetary settlement shall be made as the basis of such conciliation.

VI. INVESTIGATION AND CLOSURE

The Internal Committee shall promptly and thoroughly investigate the Complaint referred to it and submit a report of its findings. In conducting the inquiry, a minimum of 03 committee members including the presiding officer shall be present.

Every Employee needs to cooperate with the Internal Committee in its investigation and any failure to co-operate will be deemed a contravention of this Policy. The Internal Committee shall document all investigations and findings.

Procedure and Timelines A Complaint should be made by an employee in writing to the Internal Committee members within a period of 03 months of the incident or last of the incidents. The Internal Committee shall send a copy of the Complaint to the Respondent within 07 working days and the Respondent shall be required to submit the reply as well as supporting documents, if any within 10 working days. The Internal Committee shall complete the inquiry within 90 days and submit its recommendations and/or the penalty to be imposed within 10 days from the date of the completion of inquiry to the Employer and such report shall also be forthwith made available to the Complainant and Respondent. Further, the Employer shall take action as per Internal Committee recommendations within 60 days of receipt of the inquiry report.

VII. RELIEF PENDING AND POST INQUIRY

Pending inquiry, the Internal Committee may recommend the following actions to be taken:

- transfer the Complainant or the Respondent to any other Workplace;
- grant leave to the Complainant up to a period of 03 months (The leave granted to the Complainant shall be in addition to the leave he/she/they is/are otherwise entitled to);
- grant such other relief to the Complainant as may be prescribed under applicable law;
- restrain the Respondent from reporting on the work performance of the Complainant and assign the same to another Employee. Post enquiry, based on the investigation report, the Committee shall decide on the appropriate action against the Respondent. If the Company determines that sexual harassment has occurred, effective remedial action will be taken in accordance with the circumstances involved. Any Respondent determined by the Company to be responsible for sexual harassment will be subject to appropriate disciplinary action, up to, and including termination

VIII. CONFIDENTIALITY

The contents of the Complaint, the identity and addresses of the Complainant, Respondent and witnesses, any information relating to conciliation and inquiry proceedings, recommendations of the Internal Committee, as the case may be, and the action taken by

Employer shall not be published, communicated or made known to the public, press or media in any manner. The Employer shall take disciplinary action in case of violation of this obligation of confidentiality.

IX. FALSE ACCUSATIONS

If, after investigation, it becomes clear that the Complainant or any other person making the Complaint, made a false accusation (including producing forged or misleading documents) against the Respondent, the Complainant or any other person making the Complaint would become liable for appropriate disciplinary action. However, a mere inability to substantiate a Complaint or provide an adequate proof shall not attract action against the complainant. The malicious intent on the part of the Complainant shall be established after an inquiry in accordance with the procedure prescribed by the Internal Committee before any action is recommended.

OnMobile does not intend to discourage Employees from coming forward with any Complaints. OnMobile recognizes and expects that some claims may be difficult to prove or support, or may not in fact be found to raise to the level of seriousness deemed necessary to constitute sexual harassment. These types of Complaints will not be considered to be false accusations.

X. DEFINITIONS

"Complainant" is any Employee (including a representative if the Employee is unable to make a Complaint on account of his/her physical or mental incapacity or death or otherwise) who makes a Complaint alleging sexual harassment under this Policy.

"Complaint" means any complaint (written or oral form) in the nature of sexual harassment made by a Complainant.

"Employer" A person responsible for management, supervision and control of the workplace.

"Internal Committee" means the committee(s) formed by OnMobile for redressal of Complaints of sexual harassment in accordance with the procedure laid down in this Policy.

"Respondent" A person against whom a Complaint of sexual harassment has been made by an Employee.

"Workplace" In addition to the place of work it shall also include any place where the Employee or the Respondent visits in connection with his/her work, during the course of and/or arising out of employment/ contract/ engagement with OnMobile, including transportation provided for undertaking such a journey.

XI. ONMOBILE INTERNAL COMMITTEE

Presiding Officer

Arita R D Almeida (arita.almeida@onmobile.com)

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