

**PREVENTION OF SEXUAL HARASSMENT AT WORKPLACE POLICY**  
**(Pursuant to Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013)**

**1. COMMITMENT:**

- a) **M/s Software Data (India) Limited** (hereinafter "the Company") is committed to providing work environment that ensures every employee is treated with dignity and respect and afforded equitable treatment.
- b) The Company is also committed to promoting a work environment that is conducive to the professional growth of its employees and encourages equality of opportunity.
- c) The Company will not tolerate any form of sexual harassment and is committed to take all necessary steps to ensure that its employees are not subjected to any form of harassment.

**2. SCOPE:**

This policy applies to all employees (full-time, part-time, trainees and those on contractual assignments) of the Company including all subsidiaries and affiliated companies at their workplace or at client sites. The Company will not tolerate sexual harassment, if engaged in by clients or by suppliers or any other business associates.

The workplace includes:

- a) All offices or other premises where the Company's business is conducted.
- b) All company-related activities performed at any other site away from the Company's premises.
- c) Any social, business or other functions where the conduct or comments may have an adverse impact on the workplace or workplace relations.

**3. DEFINITION OF SEXUAL HARASSMENT:**

Sexual harassment may be one or a series of incidents involving unsolicited and unwelcome sexual advances, requests for sexual favors, or any other verbal or physical conduct of sexual nature.

Sexual Harassment at the workplace includes:

- a) unwelcome sexual advances (verbal, written or physical),
- b) demand or request for sexual favors,
- c) any other type of sexually-oriented conduct,
- d) verbal abuse or 'joking' that is sex-oriented,
- e) any conduct that has the purpose or the effect of interfering with an individual's work performance or creating an intimidating, hostile or offensive work environment and/or submission to such conduct is either an explicit or implicit term or condition of employment and /or submission or rejection of the conduct is used as a basis for making employment decisions.
- f) Inappropriate conduct could also be a joke, a prank or even a compliment. These gestures



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also lead to harassment although the intention of the individual might not be to offend the other person.

#### 4. RESPONSIBILITIES REGARDING SEXUAL HARASSMENT:

- a) All employees of the Company have a personal responsibility to ensure that their behavior is not contrary to this policy.
- b) All employees are encouraged to reinforce the maintenance of a work environment free from sexual harassment.

#### 5. COMPLAINT MECHANISM:

An appropriate complaint mechanism in the form of "Complaints Committee" has been created in the Company for time-bound redressed of the complaint made by the victim.

#### 6. COMPLAINTS COMMITTEE:

The Company has instituted a Complaints Committee for redressal of sexual harassment complaint (made by the victim) and for ensuring time bound treatment of such complaints.

Initially, and till further notice, the Complaints Committee will comprise of the following four members:

| Name            | Designation     |
|-----------------|-----------------|
| Navita Nagpal   | Member          |
| Rishu Bansal    | Member          |
| Ankit Kumar     | Member          |
| Kanisshka Tyagi | External Member |

- a) **Presiding Officer:** Woman employee at the level of Assistant General Manager or above
- b) Senior Woman Employee from Personnel Function (**Member**)
- c) Senior employee of the Division/ location from where the complaint has originated (**Member**)
- d) Member from an NGO or Lawyer (**Member**)

The Presiding Officer reserves the right to nominate more members of appropriate seniority and rank in the committee to conduct such enquiries to ensure equal representation of the gender as that of the complainant or for any other valid reason.

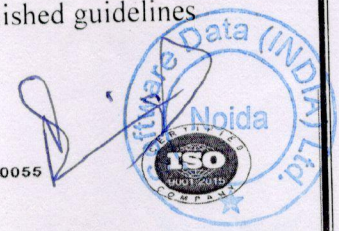
The Complaints Committee is responsible for:

- Receiving complaints of sexual harassment at the workplace
- Initiating and conducting inquiry as per the established procedure
- Submitting findings and recommendations of inquiries
- Coordinating with the employer in implementing appropriate action
- Maintaining strict confidentiality throughout the process as per established guidelines
- Submitting annual reports in the prescribed format.



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## 7. PROCEDURES FOR RESOLUTION, SETTLEMENT OF ACTS OF HARASSMENT:

The Company is committed to providing a supportive environment in which to resolve concerns of harassment as under:

### Informal Resolution Options:

When an incident of harassment occurs, the victim of such conduct can communicate her/his disapproval and objections immediately to the harasser and request the harasser to desist from such conduct in the future.

If the harassment does not stop or if the victim is not comfortable with addressing the harasser directly, she/ he can bring the concern to the attention of the Complaints Committee for redressal of grievances. The Complaints Committee will thereafter provide advice or extend support as requested and will do the needful to resolve the matter.

It is advisable that the victim keeps a record of incident i.e. date, place, possible witness and file a complaint as soon as possible.

### Procedure for complaints in occurrence of sexual harassment:

- a. Any Blossom employee with a harassment concern, who is not comfortable with the informal resolution option or has exhausted such option, may make a formal complaint to the Chairperson or any member of the Internal Complaints Committee. The victim should make a complaint within three months from the date of occurrence of the event or in a case of series of incidents, within a period of three months from the date of the last occurrence.
- b. The complaint should be submitted in writing for it to be considered as formal and for the committee to probe and take the necessary actions. The victim may submit the complaint in the form of a written letter, duly signed by the victim and submitted in a sealed envelope to the Chairperson/Member of Internal Complaints Committee. Alternatively, the victim may also send in a written communication through email to the Chairperson/Member of Internal Complaints Committee. The victim should disclose their name, department, date of occurrence, place of occurrence in the complaint letter.
- c. If any complaints are received by any of the Members of the Internal Complaints Committee, the member is obliged to bring it to the notice of the Chairperson within three working days from the receipt of the complaint.
- d. The Internal Complaints Committee should meet within 7 working days from the date of receipt of the complaint by the Chairperson to decide on the proceedings and the course of investigation.



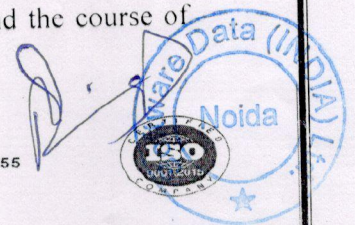
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e. A quorum of 3 members is required to be present for the proceedings to take place. The quorum shall include the Chairperson and at least two members, one of whom shall be a lady.

f. Once the complaint is received by the Internal Complaints Committee, the alleged accused should be informed regarding the complaint. It should also be made clear that no act of retaliation or unethical action by the accused shall be tolerated and that the accused should extend full support during the investigation of the case.

g. The Internal Complaints Committee shall ensure that a fair and just investigation is undertaken immediately.

h. Both the victim and the alleged accused will be questioned separately by the Internal Complaints Committee with a view to ascertain the authenticity of their contentions.

i. Witnesses named if any, shall also be questioned separately.

j. The victim and the accused shall be informed of the outcome of the investigation. The investigation shall be completed within 90 days of the receipt of the complaint. If the investigation reveals that the victim has been sexually harassed as claimed, the accused will be disciplined accordingly.

**Disciplinary action may include any of the following:**

- Formal written apology
- Suspension from services
- Transfer
- Withholding promotion
- Termination
- Police Complaint

k. In case the complaint is found to be false, the Complainant shall, if deemed fit, be liable for appropriate disciplinary action by the Internal Complaints Committee and the Management.

The final decision shall be communicated to the victim and the alleged harasser.

**8. 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



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of sexual harassment, confidentiality will be maintained throughout any investigatory process to the extent practicable and appropriate under the circumstances.

#### **9. 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.

#### **10. PROTECTION TO COMPLAINANT / VICTIM:**

The Company is committed to ensuring that no employee 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 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.

#### **11. COMPLAINTS MADE WITH A MALICIOUS INTENT**

This policy has been evolved as a tool to ensure that in the interest of justice and fair play, our employees have a forum to approach in the event of instances of sexual harassment. However, if on investigation it is revealed that the complaint was made with a malicious intent and with the motive of maligning the concerned individual / tarnishing his/her image in the company and to settle personal/professional scores, strict action will be taken against the complainant.

The Committee may also take suo motu action, if any incident of harassment is brought to its attention, without any formal complaint being made in this regard.

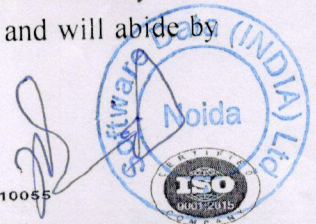
#### **12. RESPONSIBILITY OF EMPLOYEES REGARDING SEXUAL HARASSMENT**

All employees of the Company have a personal responsibility to ensure that their behaviour is not contrary to this policy. This policy is deemed to be a part of the terms of employment of every Blossom employee.

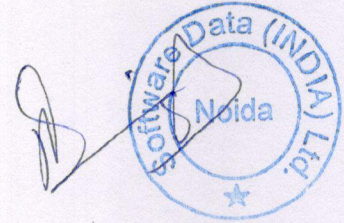
All employees are encouraged to reinforce the maintenance of a work environment free from sexual harassment.

#### **13. DISSEMINATION OF THE POLICY**

A copy of this Policy shall be given to all employees and to all new recruits and they shall sign a statement acknowledging that they have received, read, understood and will abide by the Policy.



**This Policy is as per the applicable laws of India including The Sexual Harassment of Women at Workplace (Prevention, Prohibition & Redressal) Act, 2013 as well as any other applicable law governing sexual harassment, for the time being in force in India.**



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