

Discrimination and Harassment Prevention Policy

Guiding Principle:

To ensure that we have a work environment free of all forms of discrimination and harassment. Bundl Technologies Pvt. Ltd. (herein referred to as BTPL/Company) is committed to providing a work environment where employees are free from unlawful discrimination and harassment. The Company aims at creating a workplace where employees are treated with dignity, fairness, and respect. All employees are entitled to be free from harassment on the basis of color, race, religion, gender, age, national origin, marital status, disability, veteran status, sexual orientation, or any other characteristic protected by state or federal law. Special attention should be paid to the prohibition of sexual harassment in this policy.

Applicability:

- This policy applies to all employees of the Company. Additionally, it also applies to parties with whom the Company transacts business. This policy shall continue to be in force subject to any guidelines or statutory regulations in this regard.
- This policy shall form part of the terms and conditions of employment/association of the aforesaid personnel with the Company and shall be deemed to be incorporated therein.
- This policy governs all aspects of employment, including selection, job assignment, compensation, discipline, termination, and access to benefits and training.

Prohibited Conduct:

Prohibited Discrimination

The Company prohibits any discriminatory action based on an individual's status in all aspects of our business. For purposes of this policy, discriminatory action includes, but is not limited to, firing, refusing to hire, denying training, failing to promote and discriminating in pay or other terms, conditions or privileges of employment based on an individual's status. It also includes encouraging or assisting anyone to take discriminatory actions. An individual's status includes such characteristics as race, color, ancestry, ethnicity, religion, sex, pregnancy, national origin, age, disability, marital status or sexual orientation. Individual's status also includes an individual's marriage to or association with someone with any status listed above.

We believe in treating each other with respect, whether it's a co-worker, supplier, customer, or anyone doing business with us. Harassment is any conduct which inappropriately or unreasonably interferes with work performance, diminishes the dignity of any person, or creates an intimidating, hostile or otherwise offensive work environment.

Prohibited Sexual Harassment

Sexual harassment, whether overt or subtle, quid pro quo or environmentally hostile, is strictly prohibited by both the law and Company policy. Sexual harassment may take many forms, it may be overt or subtle including, but not limited to, the following (whether directly or by implication)

- a) Verbal conduct such as epithets, derogatory jokes or comments, bullying or intimidating speech, slurs or unwanted sexual advances, invitations or comments, questions about a person's sexual practices, or gossiping about sexual relations, remarks about an individual's body, color, physical characteristics, or appearance;
- b) Visual conduct such as derogatory and/or sexually-oriented posters, offensive or obscene photography, cartoons, drawings or gestures, display of sexually suggestive or lewd objects, unwelcome notes or letters, and any other written or graphic material that denigrates or shows hostility or aversion toward an individual because of a protected characteristic, that is posted or sent via any form of electronic communication or placed on walls, bulletin boards, or elsewhere on the Company's premises or otherwise circulated in the workplace;
- c) Physical conduct such as physical interference with normal work, assault, unwanted touching, blocking normal movement or unwelcome physical contact, leering at a person's body, and threatening, intimidating or hostile acts;
- d) Retaliation against another person for having reported or threatened to report harassment, or for opposing harassment, or for participating in an investigation;
- e) Pressure for sexual activity, including offering employment benefits in exchange for sexual favors or denying employment benefits in response to a refusal to provide sexual favors; or
- f) Any other conduct that shows hostility towards, disrespect for or degradation of an individual

Harassing conduct, such as that listed above, is prohibited regardless of whether it is welcome or unwelcome, and regardless of whether the individuals involved are of the same or different sex, sexual orientation, or other status.

Harassment Complaint Procedure:

- An employee who believes that he or she has been the subject of Sexual Harassment (i.e. unwanted behaviour has continued despite requests that it cease) or has witnessed Sexual Harassment, should bring the matter, verbally or in writing, to the attention of his or her manager, Internal Complaints Committee or any Human Resources representative immediately.
- The employee is not required to contact the alleged harasser before complaining to Human Resources or management.

- Employee can report the matter on a confidential and anonymous basis by using the following city specific mail ids in case he/she is not comfortable reaching out to anyone:
 - NCR ICC <ncr.icc@swiggy.in>
 - Mumbai ICC <mumbai.icc@swiggy.in>
 - Bangalore ICC <bangalore.icc@swiggy.in>
 - Pune ICC <pune.icc@swiggy.in>
 - Kolkata ICC <kolkata.icc@swiggy.in>
 - Chennai ICC <chennai.icc@swiggy.in>
 - Hyderabad ICC <hyderabad.icc@swiggy.in>
- The ICC team for the concerned location will reach out to the concerned employee.
- The Company observes an **Open Door Policy**. Employees should normally report issues first to their immediate manager, however, they need not if doing so makes them feel uncomfortable, or if they feel their manager is violating this or any other Company policy. In all cases, employees are free to report such problems to any manager within the Company or to any Human Resources representative. Managers must contact Human Resources once they become aware of any claim of harassment.
- Complaints of Sexual Harassment shall be promptly and thoroughly investigated by a Internal Complaints Committee (ICC) set up by the Company.
- The Company will ensure that while dealing with complaints of sexual harassment employee(s) subject to the Sexual Harassment or witnesses are not victimized, retaliated against or discriminated against for reporting Sexual Harassment or for participating in a harassment investigation.
- The Company takes complaints of Sexual Harassment seriously. However, the Company shall not tolerate knowingly false complaints and will take appropriate action against an employee for making a complaint for which he or she knows there is no basis.

Harassment Investigation Process:

The Company is committed to resolving harassment issues promptly, thoroughly and impartially and with sensitivity to concerns for discretion and privacy.

Informal Resolution Process

You may ask your manager, or a Human Resources Manager or the harassment committee to work with you in seeking an informal resolution of your concern.

If the issue is unresolved through informal resolution, you may seek to follow a formal process of investigation.

Formal Investigation Process

The Company has constituted a Complaints Committee comprising of five members, including an external member, which shall investigate the alleged Sexual harassment while maintaining a strict level of confidentiality. Listed below is the investigation process -

- The Committee will speak with you (the complainant). Any notes will be subject to the strict security arrangements detailed in the section 'confidentiality' of this policy.
- The Committee will speak with the person against whom the complaint has been lodged (the respondent). Depending on the cases, the respondent will be advised as to who has made the complaint. The respondent will be given the opportunity to respond fully to each allegation.
- The Committee will also interview any witnesses nominated by either party, or other persons who may have information considered relevant to the complaint.
- The Committee will form a finding based on the information provided, and will present that finding to the Senior Management.
- Following the investigation of Sexual Harassment, the employee who has raised the complaint shall receive an oral or written reply from management on the results of the investigation and actions taken, if any. Any employee who is not satisfied with the reply may request further review by the Head of Human Resources. The management will confirm any disciplinary actions recommended as a result of the investigation. Examples of recommendations may include:
 - Counselling, and/or
 - Conciliation, and/or
 - Written warning, and/or
 - Debarring and/or
 - Disciplinary action which could include dismissal
 - Where the investigation has proven the allegation, a record of the disciplinary action and correspondence with the respondent will be kept on the Personnel File of the respondent

Confidentiality:

Only those people directly involved in resolving the complaint will have access to the relevant information. To ensure fairness, the person about whom the complaint is made has the right to know who has made the complaint, and the exact nature of the concerns raised. Records that are made during a resolution process will be stored securely and separately by the Human Resources Department, and only accessed in the event of a further relevant concern or subsequent legal action. Records will not appear on Personnel Files except where a formal investigation has established that the individual has breached company policy and disciplinary actions are to be followed.

Criminal Proceedings:

Where such sexual harassment amounts to a specific offence under the Indian Penal Code or under any other law in force, the Company shall initiate appropriate action in accordance with law by making a complaint with the appropriate authority.

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