

POLICY FOR PREVENTION OF SEXUAL HARASSMENT (POSH) OF WOMEN AT WORKPLACE

(Prevention, prohibition and redressal) act, 2013

INTRODUCTION:

To create and maintain a safe work environment, free from sexual harassment and discrimination for all its employees. Drafted as per the guidelines of 'The Sexual Harassment of Women at Workplace — prevention, prohibition and redressal Act, 2013.'

ACT:

The Sexual Harassment of Women at Workplace — Prevention, Prohibition and Redressal Act, 2013 is a legislative act that seeks to protect women from sexual harassment at their place of work. The Act came into force from 9 December 2013. This statute superseded the Vishakha Guidelines for prevention of sexual harassment introduced by the Supreme Court of India.

APPLICABILITY:

Under this Act, any woman, of any age, whether employed or not who alleges to have been subjected to any act of sexual harassment will get protection. Hence, the right of all women working or visiting any workplace, whether in the capacity of regular, temporary, ad hoc, or daily wages basis is protected under the Act. The POSH Act has been enacted with the objective of preventing and protecting women against workplace sexual harassment and to ensure effective redressal of complaints of sexual harassment.

OBJECTIVE:

The objective of this policy is to prevent sexual harassment of women at work place and also prohibit and effective redressal of complaints of sexual harassment.

DEFINITIONS:

Sexual harassment is defined by law and includes requests for sexual favors, sexual advances or other sexual conduct when (1) submission is either explicitly or implicitly a condition affecting academic or employment decisions; (2) the behaviour is sufficiently severe or pervasive as to create an intimidating, hostile or repugnant environment; or (3) the behaviour persists despite objection by the person to whom the conduct is directed. Swiggy considers such behaviour, whether physical or verbal, to be a breach of its standards of conduct and will seek to prevent such incidents and take corrective action when sexual harassment instance gets reported to the IC committee.

What is a workplace in this context? A workplace is defined as 'any place visited by the employee arising out of or during the course of employment — includes a dwelling place or a

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house;transportation provided by the employer for undertaking such a journey.’ As per this definition, a workplace covers both the organised and unorganised sectors

SEXUAL HARASSMENT AT THE WORKPLACE INCLUDES:

- Unwelcome sexual advances (verbal, written or physical).
- Demand or request for sexual favours.
- Any other type of sexually-oriented conduct.
- Verbal abuse or ‘joking’ that is sex-oriented.
- Using sexually suggestive gestures.
- Showing sexually suggestive pictures, notes, magazines or cartoons.
- 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 or submission or rejection of the conduct is used as a basis for making employment decisions. Inappropriate conduct could also be a joke, a prank or even a compliment. These gestures also lead to harassment although the intention of the individual might not be to offend the other person.

WHAT IS IC?

Internal Committee (IC) is a committee constituted to address all complaints of sexual harassment at the workplace.

IC at Bundl Technologies Private Limited [BTPL] is a 5-member committee including a Presiding officer and an External Member

GRIEVANCE MECHANISM: PROCEDURE TO REGISTER COMPLAINTS:

Any aggrieved woman can file a written complaint of sexual harassment to the IC within 3 months of the incident. Where the aggrieved woman is unable to make a complaint due to her physical incapacity, her legal heir, relative or friend, co-worker may make a complaint to the IC on her behalf, with her permission.

[An aggrieved woman can drop a mail to Internal Complaints Committee <icc@swiggy.in>](mailto:icc@swiggy.in)

PROCESS OF REDRESSAL PROCEDURE:

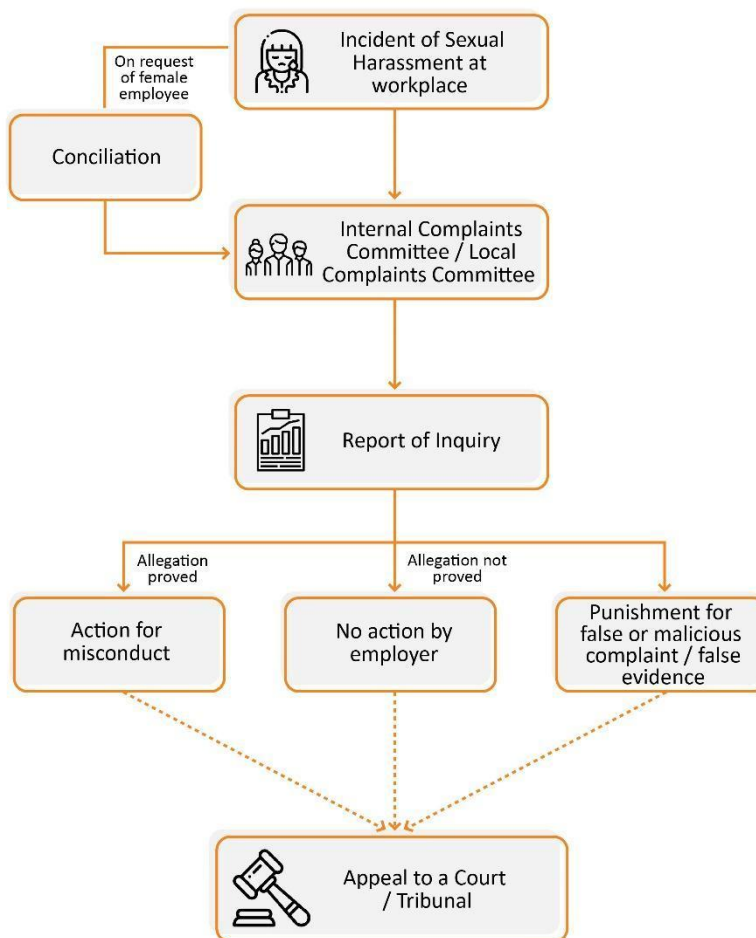
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PROCEDURE TO BE FOLLOWED



TIMELINES

A written complaint has to be filled by the female employee within 3 months of the date of the incident.

The inquiry has to be completed within 90 days.

The inquiry report has to be issued within 10 days from the date of completion of inquiry.

Employer is required to act on the recommendations of the committee within 60 days of receipt of inquiry report.

Appeal against the decision of the committee is allowed within 90 days of the date of recommendations.

Stage 1: Receipt of the complaint

- Receive and acknowledge receipt of the Complaint.
- Meet and talk to the complainant to explore options for a solution.

Stage 2: Process of Conciliation

- Try to Conciliate the both parties and get a solution.
- IC will recommends a disciplinary action

Stage 3: Process of Inquiry if conciliation failed

- Prepare and interview plan for hearing : Complaint, witnesses and respondent.

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- Assess the completeness of the information collected.

Stage 4: Finding and Recommendation

- Finding recommendation
- For instances of false allegations, the individual/group who has complained will be punishable

Stage 5: Report

- Writing the report of case with employer and parties

DISCIPLINARY ACTION AGAINST GUILTY PERSON:

The disciplinary action that will commensurate according to the nature and gravity of the offence, shall include but not limited to,

- Warning - Written apology from offender
- Transfer - Debarring from supervisory duties
- Denial of employee benefits like increments/promotion/salary correction etc.
- Cancellation of specific work Assignment - Suspension – Dismissal

ACTION AGAINST FRIVOLOUS COMPLAINTS:

To ensure that the protections contemplated under the Sexual Harassment Act do not get misused, provisions for action against "false or malicious" complainants as per the IC. For instances of false allegations, the individual/group who has complained will be punishable

WANT TO KNOW MORE ABOUT POSH?

Swiggy has multiple programs that enables employees to be aware of POSH.

- Class-room training
- Online course & certification
- Sessions from external partners
- Internal facilitated sessions
- Contact IC Members

NOTE: For any additional queries on Swiggy's POSH policy or about POSH, please reach out to your respective HR Business Partners.

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