

1.0 Objective

1.1 Coforge Limited and its Indian subsidiaries are committed to providing a work environment free from harassment of any kind, especially from sexual harassment, as per the guidelines of “The Sexual harassment of women at workplace (prevention, prohibition & redressal) Act, 2013”.

2.0 Policy Statement

- 2.1 Employees will maintain high standards of dignity, respect and positive regard for one another in all their dealings.
- 2.2 Employees will understand and appreciate the rights of the individual to be treated with dignity.
- 2.3 Employees will adopt a zero tolerance attitude against any kind of Sexual Harassment or discrimination caused by any staff member
- 2.4 Employees will refrain from committing any act of sexual harassment at workplace.
- 2.5 Allegations of sexual harassment will be dealt seriously, expeditiously, sensitively and with confidentiality.
- 2.6 Employees will be protected against victimization, retaliation for filing or reporting a complaint on sexual harassment and will also be protected from false accusations.

3.0 Purpose

- 3.1 The purpose of this document is to provide:
 - 3.1.1 A clear definition of sexual harassment and related retaliation.
 - 3.1.2 The procedure to follow when a staff member is believed to have violated the policy.
 - 3.1.3 A defined practice to ensure all allegations are investigated and dealt with effectively and in accordance with the law so that we preserve a healthy working culture.

4.0 Scope

4.1 The policy extends to all staff members of Coforge Limited and its subsidiaries (in India or Across)- has to be mentioned. This policy is deemed to be incorporated in the service conditions of all staff members with immediate effect.

5.0 Definitions

- 5.1 Staff Member - For the purpose of this policy, Staff Member includes all staff members of Coforge Limited and its subsidiaries, Client, Vendor, or Contractor in company premises, or elsewhere in India or abroad, during their tenure.
- 5.2 Sexual Harassment – Sexual Harassment comprises any unwelcome sexually-determined behavior, whether directly or indirectly, by any staff member. Such behavior could be derogatory, and could be preventing or impairing the full utilization of the staff member’s abilities.
- 5.3 Respondent – Respondent is defined as the staff member against whom the complaint has been filed,

irrespective of gender.

5.4 Complainant – Complainant is defined as the aggrieved person who files the complaint, irrespective of gender. In relation to workplace, a person of any age whether employed or not, who alleges to have been subjected to any act of sexual harassment by the Respondent.

5.5 Sexual Harassment Redressal Committee (SHRC) – SHRC is the Committee to address a complaint of sexual harassment.

5.6 Workplace - For the purpose of this policy, in addition to work premises, workplace will also include any place visited by staff member arising out of or during the course of employment including transportation provided by the employer for undertaking such journey.

5.7 Writing - For the purpose of this policy, writing shall mean any formally executed written document that can be formally attributed to its author, records and formally expresses a legally enforceable act, process, or contractual duty, obligation, or right, and therefore evidences that act, process, or agreement. Any communication made via e-mail except communication in Clause 10.3, should be confirmed in writing within 48 hours of sending the mail.

6.0 Explanation

6.1 Sexual Harassment shall include unsolicited Verbal, Non Verbal and Physical gestures, including but not limited to-

Verbal	Non Verbal	Physical
Telling Sexual Jokes	Physical conduct, such as cornering or blocking a passageway	Touching (for e.g. Applying colour during holi or cake in an unsolicited manner), patting, pinching, bumping, grabbing, kissing or providing unsolicited advances of this kind
Using sexually explicit profanity Treats (work related or otherwise) Sexually colored remarks Asking for sexual favours	Staring/clicking pictures Stalking	
Whistling in a sexually suggestive manner	Blowing Kisses, Winking	
Describing certain attributes of one's physical appearance in a sexual manner	Showcasing printed material (for example, displaying sexually oriented pictures or cartoons); posts on any social media platform; or sending sexually oriented notes, letters, emails or texts	
Using terms of endearment such as "honey," "babe," "sweetheart," "dear," "stud" or "hunk"		

6.2 A conduct if unwelcome, may constitute sexual harassment depending upon the totality of the circumstances including the severity of the conduct and its pervasiveness. Unwelcome sexually-determined behavior shall include but not limited to the following instances:

- a. Where submission to or rejection of sexual advances, requests or conduct is made either explicitly or implicitly a term or condition of employment or as a basis for employment decisions;
- b. Such advances, requests or conduct (whether direct or implied) have the purpose or effect of interfering with an individual's work performance by creating an intimidating, hostile, humiliating or sexually offensive work environment

6.3 Creating a “hostile work environment” means creating an environment that is intimidating, hostile, or offensive in a sexual manner and thus interferes with a person's ability to work. Following are examples of hostile work environment:

- a. Marginalizing someone in the workplace with regard to his / her roles and responsibilities, culture, race, gender, sexual orientation, socio-economic background etc.;
- b. Socially ostracizing;
- c. Intimidating someone physically, psychologically, emotionally or someone close to or related to the victim;
- d. Spreading rumors;
- e. Any other behavior that may commonly be construed as retaliatory.
- f. Creating a workplace where Sexual Harassment may go unheeded, where despite complaints no action is taken, and where complainant is placed under fear, disadvantage or threat of victimization.

6.4 Abuse of authority (Quid Pro Quo) – When there is demand by a person in authority, for sexual favours in exchange for work related benefits it is termed as abuse of authority (e.g. a wage increase, a promotion, training opportunity, a transfer or the job itself).

7.0 Responsibilities

7.1 As soon as the departmental head /HR receives any such complaint of sexual harassment, he /she should forward in writing to the SHRC immediately for further action.

Confidentiality:

The Company will do everything consistent with enforcement of this policy and with the law to protect the privacy of the individuals involved and ensure that the complainant and the respondent are treated fairly. Information about individual complaints and their disposition is considered confidential and will be shared only on a “need to know” basis.

7.2 SHRC

SHRC is a Committee that is formulated to address a complaint of sexual harassment.

In addition to handling a complaint of sexual harassment, the Committee may also co-ordinate preventive activities within their respective locations to create a sexual harassment free atmosphere via information mailers, circulating articles on the subject, and holding awareness sessions

To prevent instances of sexual harassment and to receive and effectively deal with complaints pertaining to the same, the SHRC shall be constituted at each location with minimum 4 members headed by a senior woman staff member (the Presiding Officer), minimum 50% women and 1 external member. The current nominated members of the Committee are given in Annexure 1.

The term of office of the members of the SHRC shall be for a period of three (3) years. Committee will be re-constituted in case any of the nominated members as per Annexure 1, is unavailable due to any reason, whatsoever.

The committee will comprise of:

- 7.2.1 Presiding Officer, who shall be a woman employed at a senior level at workplace from amongst the staff members.
- 7.2.2 One member from the Non-Governmental organization or associations committed to the cause of women or a person familiar with the issues relating to sexual harassment.
- 7.2.3 Not less than two members from amongst staff members preferably committed to the cause of women or who have had experience in social work or have legal knowledge.
- 7.2.4 At least one-half of the total Members so nominated shall be women.
- 7.2.5 The Sexual Harassment Redressal Committee email id will be shrc@coforge.com
- 7.2.6 In case any Committee member happens to be Manager / Supervisor of the complainant or the person against whom the complaint is made or closely associated with the complainant/respondent/incident being reported, he/she shall not act as a member of the Committee for that respective matter.
- 7.2.7 For the purpose of making inquiry, the SHRC shall have power in respect to the following matters, namely:
 - 7.2.7.1 Summoning and enforcing the attendance of any person and examining him or her on oath;
 - 7.2.7.2 Investigating, inquiring, cross examining any person;
 - 7.2.7.3 Directing the discovery and production of documents; and
 - 7.2.7.4 Any other matter which may be prescribe

8.0 Procedure to Complain

8.1 If any employee believes that he or she has been subjected to sexual harassment, then the complaint /grievance should be reported in writing along with the supporting documents and the names and addresses of the witnesses to the SHRC within three months from the date of last occurrence of the alleged

incident at shrc@coforge.com. If the complaint is made orally, the complainant will be requested to confirm the complaint in writing to SHRC and sign it. SHRC will provide support to complainant, if required. In an exceptional case, the time limit of three months may be relaxed to add another three months, if the SHRC is convinced of the validity of the reason for delay in reporting the incident.

- 8.2 On receipt of the complaint, the SHRC shall share a copy received from the complainant to the respondent within a period of seven working days.
- 8.3 The respondent shall file their reply to the complaint along with their list of documents, and names and addresses of witnesses, within a period not exceeding ten working days from the date of receipt of the complaint.
- 8.4 All complaints / grievances of harassment will be taken seriously, hearing will be held in strict confidence and the incident will be investigated promptly in an impartial manner. The complainant, respondent or witnesses should not be victimized or discriminated against while dealing with complaints.
- 8.5 On the request of the complainant and subject to the consent and assent of the complainant, the Committee will explore the possibility of conciliation / settlement with the respondent.

All the proceedings of such Conciliation shall be recorded in writing and the settlement arrived at, if any, shall be duly recorded and signed by both the parties. Copies of the same shall also be provided to each party. The original shall be furnished to the Management for the necessary actions, based on the report prepared by the committee post their investigation.

No monetary settlement shall be made as a basis of Conciliation.

Where settlement is arrived, no further enquiry shall be conducted by the Committee.

10.0 Enquiry into the Complaint

- 10.1 In case the complainant is not interested in carrying out Conciliation or no settlement is arrived at during the Conciliation proceedings, the Committee shall proceed with the enquiry of the complaint. The Committee members shall hear the Complainant and record her / his allegations. The complainant can also submit any evidence to substantiate his/her complaint. Written material needs to be signed by the parties to be considered as true copies. The Committee will record the proceedings of the enquiry, and the attendance of all parties present at any of the meetings.
- 10.2 Thereafter, the respondent will be called for a meeting with the SHRC through an email communication which will mention the fact that a complaint has been registered against him/her. The Committee shall make inquiry into the complaint in accordance with the principles of natural justice.
- 10.3 The Committee shall provide every reasonable opportunity to the complainant and to the respondent, for putting forward and defending their respective case. If the respondent wishes to tender any documentary evidence, he/she will be required to provide true copies of those documents to the Committee. To ensure that the documents are considered as true copies, parties will be required to sign the documents submitted.

- 10.4** The Committee shall have the right to terminate the inquiry proceedings or to give an ex-parte decision on the complaint, if the complainant or respondent fails, without sufficient cause to present herself or himself for three consecutive hearings convened by the Chairperson or Presiding Officer, as the case may be. Provided that such termination or ex- parte order may not be passed without giving a notice in writing, fifteen days in advance, to the party concerned.
- 10.5** The parties shall not be allowed to bring in anyone to represent them in their case at any stage of the proceedings before the Committee.
- 10.6** In conducting the inquiry, a minimum of three members of the Committee including the Presiding Officer shall be present.
- 10.7** Each complaint should be resolved within a period of 90 days from the complaint. The Committee will complete the enquiry as soon as is reasonably possible, and communicate its findings.
- 10.8** Any complaint that comes up has to be sent to the ICC irrespective of the nature it carries. No preliminary enquiry is to be done here.
- 10.9** In case the Committee finds the offence is covered under the Indian Penal Code, then this fact shall be mentioned in its report and appropriate action shall be initiated to support the complainant in making a police complaint.
- 10.10** In case the complaint is found to be false, the complainant/witness giving false evidence shall, if deemed fit, be liable for appropriate disciplinary action.
- 10.11** Any victimization of, or retaliation against, the complainant, respondent or any employee who gives evidence regarding sexual harassment will be subject to disciplinary action up to and including termination of employment.

11.0 Action During Pendency of Inquiry

In case of complaint of Sexual Harassment, during the pendency of the Enquiry, upon a written request made by the complainant, the Committee may recommend to the employer to:

- 11.1** Transfer the complainant / respondent to any other workplace till the Enquiry is concluded.
- 11.2** Grant leave to the complainant up to a period of three months. Such leave granted herein shall be in addition to the leave granted under the service rules; or
- 11.3** Grant any such other relief, as may be prescribed.

12.0 Third Party Harassment

Where sexual harassment occurs as a result of an act or omission by any third party or outsider i.e. clients, customers, vendors, visitor etc., the employer and person in charge will take necessary and reasonable steps to assist the aggrieved person in terms of support and preventive action.

13.0 Disciplinary Action

13.1 Where the SHRC arrives at the conclusion that the allegation against the respondent has been proved, it shall recommend to the management / HR Head to take appropriate action.

13.2 The disciplinary action will be carried out by the concerned HR department. All related documents will be maintained by internal committee ensuring confidentiality.

13.3 On the basis of the Committee's Enquiry Report, the HR Department, under the directions of the Committee, may:

13.3.1 Take disciplinary action up to and including termination of employment.

13.3.2 Any other action as may be deemed appropriate by the service rules , including but not limited to, demotion, withholding increment / promotion, legal action through appropriate authorities including but not limited to criminal action.

14.0 Appeal

Any person aggrieved from the recommendations made by the Committee or non- implementation of such recommendations may appeal to the appellate authority notified under clause (a) of Section 2 of the Industrial Employment (Standing Orders) act, 1946.

15.0 Glossary : NA

16.0 References : NA

17.0 Version Change History

S. No	VER. NO.	PREPARED BY	REVIEWED BY	REVISION DATE	APPROVED BY	RELEASE DATE	REASONS FOR NEW RELEASE
1	1	Corporate HR	Jyoti Mehta/ Sameer H Pande	01-Apr-13	Rosita Rabindra	01-Apr-13	Baseline version
2	1.1	Corporate HR	Jyoti Mehta/ Sameer H Pande	11-Jul-13	Rosita Rabindra	11-Jul-13	Changes in Complaints Committee
3	1.2	Corporate HR	Jyoti Mehta/ Sameer H Pande	23-Dec-13	Rosita Rabindra	24-Dec-13	Penal Consequences included
4	1.3	Corporate HR	Jyoti Mehta/ Sameer H Pande	08-Jan-14	Rosita Rabindra	09-Jan-14	Location specific members included
5	2	Corporate HR	Jyoti Mehta/ Sameer H Pande	25-Mar-14	Rosita Rabindra	01-Apr-14	Annual Review
6	3	Corporate HR	Balram Singh/ Sameer H Pande	25-Mar-15	Rosita Rabindra	01-Apr-15	Annual Review
7	3.1	Corporate HR	Balram Singh/ Sameer H Pande	29-Sep-15	Rosita Rabindra	29-Sep-15	Changes in Complaints Committee
8	4	Corporate HR	Balram Singh/ Sameer H Pande	01-Apr-16	Rosita Rabindra	01-Apr-16	Annual Review
9	4.1	Corporate HR	Balram Singh/Rajeev Kumar	17-Aug-16	S. Viswanathan	17-Aug-16	1. Addition/deletion in committee members 2. Defined scope of written documentation
10	4.2	Corporate HR	Balram Singh/Rajeev Kumar	30-Sep-16	S. Viswanathan	30-Sep-16	Addition of member in Central Committee
11	4.3	Corporate HR	Balram Singh/Rajeev Kumar	13-Oct-16	S. Viswanathan	13-Oct-16	Addition/deletion in location specific members
12	5	Corporate HR	Balram Singh/Rajeev Kumar	31-Mar-16	S. Viswanathan	01-Apr-17	Annual Review
13	5.1	Corporate HR	Shelly Goel/Rajeev Kumar	02-Jun-17	S. Viswanathan	02-Jun-17	Addition/deletion of committee members
14	6	Corporate HR	Shelly Goel/Rajeev Kumar	29-Mar-17	S. Viswanathan	01-Apr-18	Annual Review
15	6.1	Corporate HR	Samrina Anwar/ Nadeem Khan	04-Dec-18	S. Viswanathan	04-Dec-18	1. Addition/Deletion in Committee Members 2. Added "Inquiries into Sexual

							Orientation” as an example
16	7	Corporate HR	Niharika Singh/ Babita Karki	29-Mar-19	S. Viswanathan	01-Apr-19	Added examples of hostile work environment; Addition/Deletion in Committee Members
17	7.1	Corporate HR	Manisha Chopra/ Babita Karki	30-Dec-19	S. Viswanathan	01-Jan-20	Addition/Deletion in Committee Members
18	7.2	Corporate HR	Samrina Anwar/ Nadeem Khan	01-Feb-20	S. Viswanathan	01-Feb-20	Inclusion of Whishworks in scope of policy
19	8	Corporate HR	Samrina Anwar/Nadeem Khan	01-Apr-20	Kannika Sagar	01-Apr-20	Annual Review
20	8.1	Corporate HR	Neha Dalal/Babita Karki	01-Mar-21	Kannika Sagar	01-Mar-21	Addition/Deletion in Committee Members
20	8.2	Corporate HR	Manisha Chopra/Babita Karki	15-Jul-2021	Kannika Sagar	15-Jul-2021	Addition/Deletion in Committee Members
20	8.3	Corporate HR	Manisha Chopra/Babita Karki	15-Sep-2021	Kannika Sagar	15-Sep-2021	Addition/Deletion in Committee Members
21	9	HRSS	HRSS	20-10-2022	Navneet Prasad	01-12-22	Addition/Deletion in Committee Members

Annexure 1

The ICC (Internal Complaint Committee) for all locations namely, Greater Noida, Gurgaon, Mumbai, Kolkata, Bangalore and Hyderabad will comprise of some of the below staff members:

S.no	E. Code	Name	Band	M/F	Location	OU	VDU	Status	Email id
1	70945	AMIT KUMAR SINGH	6	M	Gr Noida	SONIM	TTH BU	Existing Member	AMIT.12.SINGH@COFORGE.COM
2	55805	BARKHA SHARMA	6	F	Gr Noida	LSO	ENABLING FUNCTIONS	Existing Member	BARKHA.SHARMA@COFORGE.COM
3	64990	MILAN GANDHI	8	M	Gr Noida	TTH- Mgmt	TTH BU	Existing Member	MILAN.GANDHI@COFORGE.COM
4	11448	PAWAN TEWARI	6	M	Gr Noida	Gatwick	TTH BU	Existing Member	PAWAN.TEWARI@COFORGE.COM
5	2701	PREETI GUJRAL	7	F	Gr Noida	RO Europe	EUROPE GEO	Existing Member	PREETI.GUJRAL@COFORGE.COM
6	6322	RAJEEV GUL ATI	7	M	Gr Noida	US GEO	US GEO	Existing Member	RAJEEV.GULATI@COFORGE.COM
7	7873	SARVESH KUMAR SHARMA	7	M	Gr Noida	Sabre	TTH BU	Existing Member	SARVESH.K.SHARMA@COFORGE.COM
8	9357	SONA WALIA	6	F	Gr Noida	Corp Dev Off	ENABLING FUNCTIONS	Existing Member	SONA.WALIA@COFORGE.COM
9	11924	TANMAY KOUL	7	M	Gr Noida	Lincoln	INSURANCE	Existing Member	TANMAY.KOUL@COFORGE.COM
10	81573	Sarita Talwar	7	F	Gr Noida	Digital SL	SERVICE LINE	New Proposed Member	SARITA.TALWAR@COFORGE.COM
11	103660	Manjari Misra	7	F	Gr Noida	HRO	ENABLING FUNCTIONS	New Proposed Member	MANJARI.MISRA@COFORGE.COM
12	103404	Navneet Prasad	8	M	Gr Noida	HRO	ENABLING FUNCTIONS	New Proposed Member	NAVNEET.PRASAD@COFORGE.COM
13	94090	NARAYAN KASHYAP	7	M	Gr Noida	US GEO	US GEO	New Proposed Member	NARAYAN.KASHYAP@COFORGE.COM
14	83072	Anju Tandon	8	F	Gr Noida	APAC-Mgmt	APAC BU	New Proposed Member	ANJU.1.TANDON@COFORGE.COM
15	76637	Vikas Kumar	8	M	Gr Noida	IMS SL	SERVICE LINE	New Proposed Member	VIKAS.K@COFORGE.COM
16	91351	Richa Sethi	7	F	Gr Noida	HRO CAP DEV	ENABLING FUNCTIONS	New Proposed Member	RICHA.SETHI@COFORGE.COM
17	40879	EKTA ALEXANDER	6	F	Gurgaon (client site)	BPS-C&W	BFS	Existing Member	EKTA.ALEXANDER@COFORGE.COM
18	69733	Prabhjeet Singh Oberoi	7	M	Gurgaon	ADG Prod Dev	ADVANTAGEGO	New Proposed Member	PRABHJEET.OBEROI@ADVANTAGEGO.COM
19	83748	Anuradha Sehgal	8	F	Gurgaon	CMO	ENABLING FUNCTIONS	New Proposed Member	ANURADHA.SEHGAL@COFORGE.COM
20	50563	Bhavna Vasudeva	6	F	Gurgaon	ADG Support	ADVANTAGEGO	New Proposed Member	BHAVNA.VASUDEVA@ADVANTAGEGO.COM
21	47746	RAVI D' LIMA	6	M	Mumbai	Sabre	TTH BU	New Proposed Member	RAVI.DLIMA@COFORGE.COM
22	45205	MONIKA NAGPAL	6	F	Mumbai	APAC-ROInd	APAC BU	New Proposed Member	MONIKA.NAGPAL@COFORGE.COM
23	101264	SOUMYAJIT SEN	7	M	Bangalore	BFS-Mgmt	BFS	New Proposed Member	SOUMYAJIT.SEN@COFORGE.COM
24	5613	KRISHNA KUMAR	6	M	Bangalore	Sabre	TTH Delivery	Existing Member	K.KRISHNAKUMAR@COFORGE.COM
25	73309	Mamtha Nag	6	F	Bangalore	DPA-SSD	US GEO	New Proposed Member	MAMATHA.NAG@COFORGE.COM
26	93895	RAJA SEKHAR RAO KINTALI	7	M	Bangalore	Santander	BFS	New Proposed Member	RAJASEKHAR.KINTALI@COFORGE.COM
27	70623	SEEMA KUNDE	6	F	Hyderabad	DPA - RDG	SERVICE LINE	Existing Member	SEEMA.KUNDE@COFORGE.COM
28	91472	VENKAT RAMAN KUMAR SETTIPALLY	6	M	Hyderabad	DPA-SSD	EUROPE GEO	Existing Member	RAMAN.SETTIPALLY@COFORGE.COM
29	99061	Renuka	6	F	Hyderabad	DPA - HRO	SERVICE LINE	New Proposed Member	RENUKA.VENKATESHA@COFORGE.COM
30	80086	Kameshwari	7	F	Hyderabad	DPA-SSD	EUROPE GEO	New Proposed Member	KAMESHWARI.BHAMIDI@COFORGE.COM
31	104570	Vipul Goel	6	M	Hyderabad	DPA-SSD	EUROPE GEO	New Proposed Member	VIPUL.GOEL@COFORGE.COM
32	7632	RAJAT BASU	6	M	Kolkata	CEUR-ING Eur	BFS	Existing Member	RAJAT.BASU@COFORGE.COM

Presiding Officer	Manjari Mishra	Manjari.Misra@coforge.com
External Consultant	Arti Choundhary	arti_chaudhry@artichaudhry.com

The Sexual Harassment Redressal Committee email id is shrc@coforge.com.