

COVANCE SOFTSOL LIMITED

POLICY ON PREVENTION, PROHIBITION AND REDRESSAL OF SEXUAL HARASSMENT AT THE WORKPLACE

1. Objective

In compliance with the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (“Act”) and Rules made thereunder, we have formulated the Policy on Prevention, Prohibition and Redressal of Sexual Harassment at the Workplace (“Policy”) for prevention of Sexual Harassment at Workplace.

The Company is committed to providing a safe and respectful work environment, free from sexual harassment. This Policy aims to prevent and address sexual harassment in the workplace, ensuring a comfortable and inclusive environment for everyone.

This Policy aims to achieve the following objectives:

- a. **Prohibit Sexual Harassment:** Prevent and prohibit all forms of sexual harassment, including verbal, non-verbal, and physical conduct, in the workplace or in connection with work-related activities.
- b. **Establish Clear Complaint Procedures:** Provide a fair, confidential, and accessible process for employees to report incidents of sexual harassment, ensuring prompt and thorough investigations.
- c. **Enforce Disciplinary Actions:** Impose suitable disciplinary measures, up to and including termination, against employees found guilty of sexual harassment, ensuring accountability and maintaining a harassment-free workplace.

2. Scope

The Company aims to adopt a zero-tolerance attitude towards any kind of sexual harassment or discrimination caused by any employee, consultant, contractor, vendor, or any person formally associated with them towards any other person being a woman employee of the Company or that of its partner, client, vendor, or contractor in the premises of the Company or any other workplace of the Company.

This Policy will be reviewed and updated from time to time to ensure that it is current. All updates and revisions to the Policy will be approved by the Board of Directors (“Board”) of the Company.

3. Definitions

- a) “Act” means “The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013” and any amendment thereto.
- b) “Aggrieved Woman” means any female Employee of the company or any woman who alleges to have been subjected to any act of Sexual Harassment at the Workplace.

- c) "Internal Complaints Committee" means a committee by that name, constituted by the Board of the Company as per the provisions of the Act.
- d) "Respondent" means the person against whom the allegation of Sexual Harassment has been made by the Aggrieved Woman.

4. Sexual Harassment

Sexual Harassment is an unwelcome inappropriate behaviour (whether directly or by implication) which includes:

- a) Physical contact and advances including touching, deliberately brushing against another person, interference with an individual's normal work movement or assault.
- b) Demand or requests for sexual favours, offensive or unwelcome flirtations, unwanted sexual advances or propositions, threats or suggestive or insulting sounds.
- c) Making sexually coloured remarks including sexual tones including repeated sexual innuendoes, sexual epithets, derogatory slurs, sexually explicit jokes, letters, phone calls, text, e-mails, WhatsApp or through any other electronic communication etc.
- d) Showing pornography such as derogatory or sexually explicit posters, cartoons, photographs, magazines, drawings, or other printed items; suggestive objects, pictures; emails, screen savers; or other electronic communications; graphic commentaries and leering or obscene gestures.
- e) Any other unwelcome visual, verbal, or physical conduct of a sexual nature.

Note: These actions may manifest themselves in the form of varied behaviours, for example, gestures, actions, sounds, etc.

5. Internal Complaints Committee

The Internal Complaints Committee shall comprise of:

- a) A Presiding Officer who shall be a woman employed at a senior level at workplace from amongst the employees;
- b) Not less than 2 (two) members from amongst employees preferably committed to the cause of women or who have had experience in social work or have legal knowledge; and
- c) One member from amongst non-governmental organization or associations committed to the cause of women or a person familiar with the issues relating to sexual harassment.

The Internal Complaints Committee will operate on the following guidelines:

- a) the person against whom the allegation of Sexual Harassment has been made by the Aggrieved Woman Complaints Committee shall meet as and when any instance of violation of the policy is referred to the committee and, in any case, at least once in a year.

- b) Internal Complaints Committee shall prepare the annual report and submit the report pertaining to number of cases filed and their disposal under the act to the Board.
- c) The Presiding Officer and the members of the Internal Complaints Committee will hold the position upto three years from the date of their nomination.

6. Functioning of Committee

A. Lodging a Complaint

- a) The Aggrieved Woman makes a complaint directly to the Presiding Officer of the Internal Complaints Committee. The Presiding Officer should be able to try and solve the grievance informally before escalating the matter to the formal Committee within a period of three months from the date of incident.
- b) Where an Aggrieved Woman is unable to make a complaint on account of her physical incapacity, a complaint may be filed by (a) her relative or friend, or (b) her co-worker, (c) an officer of the National or State Commission for Women, or (d) any person who has knowledge of the incident, with the written consent of the Aggrieved Women.
- c) Where an Aggrieved Women is unable to make a complaint on account of her mental incapacity, a complaint may be filed by (a) her relative or friend, or (b) a special educator, or (c) a qualified psychiatrist or psychologist, (d) the guardian, or (e) any person who has knowledge of the incident jointly with any of the persons mentioned in (i) to (iv) of this paragraph.
- d) Where an Aggrieved Women, for any other reason, is unable to make a complaint, a complaint may be filed by any person who has knowledge of the incident, with the written consent of the Aggrieved Women.
- e) The Internal Complaints Committee may, for the reasons to be recorded in writing, extend the time limit, if it is satisfied that there were unavoidable circumstances which prevented the Aggrieved Woman from filing a complaint within the said period. Such complaint shall contain all the material and relevant details concerning the alleged Sexual Harassment including the name of the contravener. The information disclosed by such complainant should be treated as confidential information by the members of the Internal Committee.
- f) If the Aggrieved Woman would like to initiate action under the Indian Penal Code, 1860 ("IPC"), she may inform the management of the Company, and the management will provide necessary assistance to the Aggrieved Woman to file the complaint in relation to the offence under the IPC.

If the complainant needs assistance in writing the complaint, they can seek help from Committee. The complaint can be submitted to the Committee:

Electronically at:
cs@covance.ai

Physically / Post at:
To
Internal Complaints Committee,
Covance Softsol Limited
Plot No.4, Info city, Madhapur, Hyderabad,
Shaikpet, Telangana, India, 500033

B. Conciliation

The Internal Complaints Committee may, before initiating an inquiry, at the request of the complainant take steps to settle the matter between her and the Respondent through conciliation. However, no monetary settlement shall be made the basis of the conciliation. Where a settlement has been arrived at as mentioned above, the Internal Complaints Committee shall record the settlement so arrived at and forward the same to the management of the Company to take action as specified in the recommendation and shall provide copies of the settlement to the complainant and the Respondent.

C. Inquiry into Complaint

The Internal Complaints Committee shall proceed to make inquiry into the complaint in accordance with the provisions of the service rules applicable. Such an inquiry (with due conciliation as appropriate) shall be completed within a period of three months. Confidentiality of the complaint procedure will be maintained.

The Internal Complaints Committee shall proceed to make an inquiry into the complaint in accordance with the principles of natural justice and further during the course of inquiry provide an opportunity of being heard to the complainant and the Respondent and the relevant witnesses provided by the complainant and the Respondent.

D. Inquiry Report

On the completion of such inquiry, the Internal Compliance Committee shall provide the report of its findings to the Managing Director within a period of 10 days from the date of completion of enquiry and such report be made available to the concerned parties. The Managing Director shall act upon the recommendation within 60 days of its receipt.

In the event that the Internal Complaints Committee arrives at the conclusion that there is no case for Sexual Harassment, then the complaint may be dropped by the Internal Complaints Committee, and it shall notify the management of Company of the same.

7. Penalties to Respondent

If the Sexual Harassment complaint is proved prima-facie right to the Internal Complaints Committee based on the material and/or witness verified by them, then the Committee will recommend to the Managing Director punishment to the Respondent in terms of:

- Warning in writing
- Immediate suspension from the services
- Immediate termination
- May immediately refer the case based on the gravity and merits of the case to the local police / judiciary

8. Punishment for false complaints

Where the Internal Complaints Committee arrives at a conclusion during or after the inquiry that the allegation against the Respondent is either malicious or false, appropriate punitive action may be taken by the Managing Director as per service rules applicable on recommendations of the Internal Complaints Committee.

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

10. 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.

11. 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 the 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.

12. Lodging a false complaint

- a. If, based on investigations, the Internal Compliance Committee / the Company arrives at the conclusion that a prima facie case of harassment has not been made out against an employee and that the charges were brought falsely, and with malicious intent the management of the Company will initiate appropriate disciplinary action which may include termination of the employee who falsely accuse another in accordance with the Company's disciplinary procedures.
- b. All records of sexual harassment reports and investigation shall be considered confidential and shall not be disclosed publicly except to the extent required by the Act or any other laws.

13. Third party harassment

When sexual harassment occurs because of an act or omission by any third party or outsider, the Company will take steps necessary to assist the Aggrieved Woman in terms of support and prevention action within the legal norms.

14. Amendments / Modifications

The Policy will be amended or modified to align with any amendments made to the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 or such other circulars, guidelines, standards or regulations issued by any statutory or regulatory authority or laws applicable to the Company or as and when deemed fit. In the event of inconsistency of this Policy with any statutory provisions, then the relevant statutory provisions shall prevail upon the provisions of this Policy.
