



Cigniti

Prevention of Sexual Harassment Policy

Version 6.1



Revision History:

Version Number	Release Date	Prepared By	Reviewed By	Approved By	Summary of Changes
1	05-Jan-14	Shashikala Kalaga	Shashikala Kalaga	Ramana Vemuri	Initial Version
2	30-Mar-15	Rakhi Raveendran	Shyam Patlolla	Ramana Vemuri	Changed the ICC member committee.
2.1	01-Oct-15	Venkatesh Pentakota & Karuna Ponnada	Shyam Patlolla	Ramana Vemuri	Changed the ICC member committee.
2.2	03-Jun-19	Venkatesh Pentakota & Amit Sahoo	Shyam Patlolla	Ramana Vemuri	Added and changed the ICC member committee.
3.0	01-Nov-19	Venkatesh Pentakota & Amit Sahoo	Dr. Medha Shetye, External Legal Consultant	Ramana Vemuri	Revamped policy and introduced external member to the ICC committee.
4.0	13-Jun-22	Vivek B Aquila	Soundarya Kanthi	Veera Reddy	Updated ICC committee members list.
5.0	5-Sep-22	Vivek B Aquila	Soundarya Kanthi	Veera Reddy	Updated ICC committee members list.
6.0	22-June-23	Vivek B Aquila	Soundarya Kanthi	Veera Reddy	Updated ICC committee members list.
6.1	27-Nov-23	Vivek B Aquila	Swapna Vittal	Veera Reddy	Updated ICC Committee members list

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1. Objective

At Cigniti Technologies Limited (hereby referred to as Cigniti), Employees and Others are entitled to work in an environment free from sexual harassment and not be part of a hostile or offensive working environment. Conducts violating this principle, may result in disciplinary action including but not limited to dismissal from the services of Cigniti. Cigniti will not tolerate, condone or allow sexual harassment, whether engaged in by fellow employees, supervisors, associates, clients or other non-employees who conduct business with Cigniti. The policy aims to ensure gender equality and justice through all its processes, practices and interventions.

2. Scope

This policy is issued to all the employees of Cigniti (including its subsidiaries and affiliates) in India (collectively referred to as “Cigniti” solely for this document). This policy is made in compliance with the Law of the Land related to Prevention, Prohibition, and Redressal of Sexual Harassment at workplace.

3. Applicability

This policy applies to all the Employees and Others while on official duty in the Workplace.

- “Employee” means any person who is on the payrolls of Cigniti at the time of the incident.
- “Others” mean personnel working on the contract (whether part-time/full-time/temporary/adhoc individuals engaged on a daily wage basis) with or without remuneration, apprentice, trainee, probationer, and managed services employees and/or as consulted deputed at Workplace and includes authorized visitors to the workplace.

Only for the purpose of this policy, Employees and Others shall hereinafter be collectively referred to as “Employees”

- “Workplace” includes all office locations of Cigniti across India and/ or any place visited by the Employees arising out of or during employment including transportation provided by Cigniti.

- This policy is not designed as a substitute for legal proceedings nor does it intend to impair or limit the right of anyone seeking a remedy available under law. Legal recourse shall vest within the appropriate jurisdiction of the applicable court (civil or criminal) depending on the nature of the offence. However, when a complaint is made, Cigniti intends to make reasonable efforts to address the complaints.
- Proceedings under this policy shall continue (unless withdrawn) notwithstanding any proceedings initiated by the Complainant against a Respondent under any law in force.

4. Policy Statement

Definition

- A. Sexual harassment includes any or more of the following unwelcome acts or behavior (whether directly or by implication) namely: -
- Physical contact and advances; or
 - A demand or request for sexual favors; or
 - Making sexually colored remarks; or
 - Showing pornography; or
 - Any other unwelcome physical, verbal or non-verbal conduct of a sexual nature
- B. Sexual harassment includes unwelcome or unwanted conduct of sexual nature when:
- The Employee's submission to or rejection of this conduct-made, explicitly or implicitly, affects decisions regarding hiring, evaluation, professional performance, promotion or other aspects of employment, or
 - Such behavior/ conduct directed against an individual persists despite rejection; or
 - This conduct substantially interferes with an individual's employment or creates an intimidating hostile or offensive work environment

5. Internal Core Committee

An "Internal Core Committee" has been constituted by Cigniti for India region to consider, investigate and redress complaints of Sexual Harassment. This committee shall provide appropriate recommendation towards the redressal of Sexual Harassment complaints. The details of the Internal Core Committee members are as follows:

SL No	Name	Employee ID	Role
1	Urmila Markili	E000002	Presiding officer
2	Sunitha Venkatesh	-----	External Member
3	Madhuri Tsundupalli	E007547	Member
4	Saikiran Ramaraju	E001128	Member
5	Siva Narreddy	E002120	Member
6	Seshasai Parisaboina	E009305	Member
7	Sandhya Nagaraj	E001019	Member
8	Sirisha Kommireddi	E005182	Member

6. Complaint Redressal

Redressal Process:

- i. If an Employee is sexually harassed, he / she, can inform the person who has harassed that his/her behavior is unwelcome and ask him/her to stop and/or:

- File a complaint directly on reach2resolve@cigniti.com

It is recommended that as a best practice a record of incidents (dates, times, locations, possible witness, the incident and the response) should be maintained. However, these details might always not be made available, but preservation of these records will help in the investigation of the complaint for harassment.

- ii. In the event the Employee prefers to file a complaint, the following will be

applicable: a. **Filing of Complaint:**

- A. It is the obligation of all Employees to report sexual harassment experienced by them. However, in the event complaint has not been made in writing, the Complainant shall receive reasonable assistance so as to make a written complaint.

If an Employee, who has undergone harassment, is unable/unwilling to file a complaint, his/her manager/HR/witnesses to the Harassment can also file a complaint on behalf of the Employee post obtaining written consent from the Employee.

- B. Where the Employee who has been sexually harassed is not able to make a complaint on account of his/her mental capacity or death or otherwise, the Employee's immediate family may make a complaint.
- C. The complaint shall be submitted to the Internal Core Committee within three months (90 days) from the occurrence of the incident and in the event, there are a series of incidents. A complaint needs to be filed within three months from the date of the last incident. However, Internal Core Committee at its discretion, depending on the facts and reasons provided for the delay by Employee, may condone the delay.
- D. The office of the Internal Core Committee will maintain a register to endorse the complaint received by it and keep the contents confidential if it is so desired, except to use the same for discreet investigation. Cigniti will always endeavor to maintain confidentiality, save and except for circumstances when Cigniti is required by the law to disclose information (such as in response to legal processes) and when disclosure is required by Cigniti's outweighing the interest in protecting the right of others. It is also the responsibility of the complainant, respondent and witnesses to adhere to confidentiality provisions.

b. ***Dealing with Complaints:***

A. Conciliation

- i. At the request of the aggrieved Employee, ICC – before initiating inquiry – may take steps to settle the matter between aggrieved Employee and the Respondent through reconciliation.
- ii. In the event settlement has arrived between the aggrieved employee and Respondent, the ICC shall record the settlement terms and shall advise Cigniti to take actions as prescribed in the conciliation statement. Internal Core Committee will review the settlement terms so as to ensure uniformity across Cigniti. No monetary settlement shall be made under conciliation proceedings.

- iii. Where a settlement has arrived, no further inquiry shall be conducted.

B. Inquiry Process

- i. Where conciliation is not arrived at or not invoked, the ICC shall initiate an inquiry into the complaint.
- ii. ICC shall investigate by:
 - a. Meeting with complainant, respondent and witnesses (if any);
 - b. Compilation of evidence, if any
- iii. The inquiry process must be completed within the timelines as prescribed under law.

C. Inquiry Report

- i. The ICC shall document a report of its findings along with its recommendation and shall then provide a conclusion and recommendation to be executed by the HR Team.
- ii. In the event allegations are proved against the respondent, Internal Core Committee shall recommend appropriate actions which may include but is not limited to:
 - a. Initiate disciplinary actions as Sexual Harassment is an act of misconduct.
 - b. Deduct, subject to applicable laws, from the salary of the Respondent any sum as the Internal Core Committee considers appropriate (to be determined in accordance with the law) to be paid to the Complainant or legal heirs of Complainant.
- iii. Actions may also include community service, transfer, withholding promotion, suspension or even dismissal. This action shall be in addition to any legal recourse sought by the Complainant and/or Cigniti

Please note:

1. Internal Core Committee shall be governed by such rules as may be framed by Supreme Court orders or any other legislation enacted from time to time.
2. Cigniti, through the ICC, shall devise procedure(s) so as to ensure that all participants such as complainant/ witnesses/ investigation team members are protected from any retaliatory actions by any person, whomsoever.
3. In addition to the specific requirements of confidentiality mentioned elsewhere in this policy, Cigniti shall ensure that an Employee who complains to the ICC or participates in its investigation

as a witness or otherwise shall not be subject to any favorable/ unfavorable treatment whatsoever during his/her employment.

7. Actions during the pendency of Inquiry

1. During the pendency of inquiry, on a written request made by the complainant, the Internal Core Committee may recommend to –
 - i. Transfer the complainant or the respondent to any other workplace;
 - ii. Grant leave to the complainant; provided that leaves, as granted to the complainant under this section will be in addition to the leave(s) he/she would be entitled to otherwise if the Internal Core Committee decides in his/her favor
 - iii. Grant to the complainant any other relief which may be prescribed.
2. To the best of its knowledge, in case Internal Core Committee finds that the degree of offence is coverable under the Indian Penal Code, then this fact shall be mentioned in its report and may facilitate the complainant if he/she so desires, in initiating the filing of a police complaint, if not already done.

8. 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 and to settle personal/ professional scores, strict action will be taken against the complainant, including but not limited to disciplinary actions such as transfer, withholding promotion, suspension or even dismissal from the services of Cigniti.

The employees who are a victim of Sexual Harassment may, in addition to the above, seek legal remedies as may be provided under the various laws for the time being in force.

9. Management Rights

Cigniti reserves the right to amend this policy from time to time, without prior notice.

