



KINDUZ

Anti-Discrimination and Anti-Sexual Harassment Policy

Version 1.2

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KINDUZ Consulting believes in high standard of behaviour and committed to lawful and ethical conduct of business. KINDUZ expects its all stakeholders to maintain equally high standard of behaviour at all places. This Anti-Discrimination and Anti-Sexual Harassment policy is adopted to attain and maintain high standard of ethics and behaviour at office and at all work places.

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1 SCOPE

- 1.1 This Anti-discrimination and Anti-Sexual Harassment policy is applicable to all stakeholders of KINDUZ Globally.

2 DEFINITIONS

- 2.1 **“Stakeholders”** include but are not limited to a KINDUZ’s parent, subsidiary, sister and affiliated companies, party’s investors, directors, vendors, partners, suppliers, legal authorities, agents, governments, associates, employees, interns, contractors, consultants, clients and customers, communities that the party supports. The definition also covers any of the above organization’s stakeholders as well.
- 2.2 **“ICC”** is the “Internal Complaints Committee” to receive, investigate, deal and take necessary corrective steps including disciplinary action in respect of the associate(s) against whom sexual abuse and/or discrimination charges are levelled.

3 OVERVIEW

- 3.1 Anti-discrimination and Anti-Sexual Harassment policy is needed to create awareness and to communicate and enforce the zero-tolerance policy of KINDUZ towards any form of discrimination and/or sexual harassment.

4 OBJECTIVE

- 4.1 The objective of Anti-discrimination and Anti-Sexual Harassment policy is to create awareness and to provide protection against sexual harassment and discrimination at workplace and for the prevention and redressal of complaints of sexual harassment & discrimination.

5 POLICY

- 5.1 KINDUZ Beliefs
- 5.1.1 KINDUZ maintains a positive working environment, devoid of fear, intimidation, discrimination and sexual harassment of any kind in its working.
 - 5.1.2 KINDUZ provides equal employment opportunities to all and does not discriminate based on nationality, race, caste, religion, colour, physical appearance, wealth, political connections, gender, age, disability, creed, or veteran status in admission and access to, and treatment and employment in its activities.
 - 5.1.3 KINDUZ accepts the fact that every associate has a right to work with dignity and protection against sexual harassment and discrimination.
 - 5.1.4 KINDUZ provides at all times a work environment that encourages mutual respect, healthy relations and courtesy and sees that its associates work without gender bias, and prejudice
 - 5.1.5 KINDUZ, as per the law of the land or otherwise, considers any type of sexual harassment as violation of fundamental right of a person to live with dignity and views any act of sexual abuse and or harassment as damage to dignity and health of both the individual and organization.
- 5.2 KINDUZ Policy
- 5.2.1 In pursuit of these goals, KINDUZ will not tolerate and prohibits any or all acts of sexual harassment and or discrimination or related retaliation against or by any associate partner, client or other customer irrespective of gender.
 - 5.2.2 The policy is meant to educate the associates of KINDUZ about what constitutes sexual harassment and enumerates steps to prevent occurrence of such acts and to deal with the fair mechanism, in the event of such occurrence.
 - 5.2.3 KINDUZ considers any one or more of following acts or behaviour whether directly or by implication as sexual harassment acts:
 - 5.2.3.1 Use of offensive and or abusive language against other associate(s).
 - 5.2.3.2 Unwelcome behaviour in the form of unwanted/ unnecessary and or un warranted physical contact.



- 5.2.3.3 Sexually coloured remarks or bawdy humour.
- 5.2.3.4 Eve teasing in all forms.
- 5.2.3.5 Unwanted exhibition of pornographic material.
- 5.2.3.6 Any type of unwelcome gestures, requests or demand for sexual favours or sexual advances either implicitly or explicitly.
- 5.2.3.7 Unwelcome sexual advances involving verbal or non-verbal or physical conduct that includes lewd remarks, letters, phone calls, emails, SMS, gestures, lewd stares, stalking sounds, physical contact, assault, stalking, molestation, display of vulgar signs, and exhibition of pictures and/or photos which causes stress of stakeholders at workplace, comments of physical appearance, body shaming, sensitivity and dignity of the associate, irrespective of gender.
- 5.2.3.8 Coercion, taunts and physical confinement against will and intrusion into ones privacy,
- 5.2.3.9 Creating hostile atmosphere at work to create fear or to coerce the other associate to get sexual favours.
- 5.2.3.10 Entering areas and rest rooms ear marked specifically for one gender without valid reason and or with the intent of creating mischief and harassment.
- 5.2.3.11 Demanding sexual favours by any superior authority/colleagues for giving or keeping a job benefit, for giving a favourable report, for giving promotion and for increase of wages/better job benefits.
- 5.2.3.12 Demanding sexual favours by threatening the victim to fire from the employment or make false complaints if his/her desires are not met with.
- 5.2.3.13 Implied or explicit promise of preferential treatment in her/his employment or implied or explicit threat of detrimental treatment in her present or future employment status or interference in her/his work or humiliating treatment likely to affect her/his mental/physical health and safety.
- 5.2.3.14 Trafficking of associate(s) for exploitation by threats and coercion and or harbouring associates by threats or coercion for sexual abuse.
- 5.2.3.15 Sending associate(s) or asking associates to come to unwanted places at odd hours with malicious intentions by coercion or by cheating.
- 5.2.4 Normal conversations, friendly approaches and relationships built up without coercion or intimidation at work places that are required and acceptable to the parties/persons involved do not fall under the category of sexual offences.
- 5.3 This policy is applicable to all associates at all places, inside office premises or outside at clients place or while on tour and within business hours or outside working hours.
- 5.4 KINDUZ expects its associates to behave in a dignified manner with good conduct outside the office premises also. As such any unlawful sexual act resulting in complaint or unlawful sexual/ discriminatory act that has come to the notice of KINDUZ against any associate shall be viewed seriously.
- 5.5 It is also a violation of this policy for anyone acting knowingly and recklessly either to make a false complaint of sexual harassment/discrimination or to provide false information regarding a complaint or support an abuser for personal gains. KINDUZ safe guards the associates of any gender against false and malicious complaints.
- 5.6 Though KINDUZ is not directly responsible for any alleged act of sexual harassment that has occurred during or beyond office hours outside to an associate of KINDUZ, it shall view the act seriously, as a violation of the organization's dignity and
- 5.7 KINDUZ reserves the right to act appropriately as per the conditions to assist, support and protect the interest/dignity of the associate (s) concerned by taking necessary and reasonable steps.
- 5.8 KINDUZ shall take relevant steps to take appropriate action against the associate/person responsible for and involved in unwanted sexual abuses/harassment or discriminatory acts on the basis of complaint received or observations made for the alleged unwarranted acts.
- 5.9 KINDUZ shall refer all types of complaints of discrimination and sexual abuse/harassment to the "Internal Complaints Committee" specially formed for this purpose for fair and speedy investigation and report.



- 5.10 The Government Act requires employers to conduct education and sensitization programs and develop policies against sexual harassment, among other obligations. As such KINDUZ shall do and take all necessary steps in this direction and to have a fair mechanism in the form of “Internal complaints committee”.

6 GUIDELINES FOR REPORTING HARASSMENT & DISCRIMINATION

- 6.1 Any associate of KINDUZ shall know that sexual harassment or discrimination is illegal as per the law of the land and as per KINDUZ code of conduct. The protection against sexual harassment and discrimination and the right to work with dignity are universally recognised human rights by international conventions and governments.
- 6.2 If you think you are being subjected to discrimination or sexual harassment:
- 6.3 First politely ask the associate involved to stop his or her unwelcome/unwanted behaviour.
- 6.4 Don't ignore or hide the incident, however small it may be, bring it to the notice of ICC in written as quickly as possible as delay and hiding will encourage the offender further.
- 6.5 Ensure that while giving a written notice to the ICC mention the date, location and nature of the harassment. Confidentiality as mandated by the law will be maintained during the investigation.
- 6.6 Report any relevant cases immediately to ICC, irrespective of the position of the harasser(s).
- 6.7 Keep a copy of letters, SMS, Memos, emails, phone call records or any other relevant record to substantiate the complaint.
- 6.8 Be specific in giving the details in complaint. The complaint should not be vague and imaginary and based on assumptions.
- 6.9 Associate(s) who feel that they are victimized or harassed must maintain a record of incidents of unwanted/ unwelcome behaviour including time, date, place, witnesses if any and or any other relevant information and submit to the ICC formed at KINDUZ to investigate with all complaints of sexual harassment and discrimination. It is the duty and responsibility of the victim to provide all details to ICC for getting justice.
- 6.10 Where the aggrieved person is unable or not able to register a complaint on account of physical or mental disability or under coercion or threat the complaint can be registered by a friend/relative/guardian/co-worker or any person or qualified psychiatrist, physician or psychologist having the knowledge of the incident.
- 6.11 The victims of sexual abuse or harassment or discrimination shall report to the Chairperson of the ICC, formed specially for this purpose in writing or via email or messages, as per the circumstances and shall be responsible to submit all documentary proof if demanded by the committee at the time of investigation.

7 COUNTRY SPECIFIC DETAILS

- 7.1 Article 19(1) of the Indian constitution affirms the right of all citizens to be employed in any profession of their choosing or practice their own trade /business. It was established that actions, resulting in violation of one's right to “Gender equality “and Life and Liberty” are in fact violation of the victim's fundamental right under article 19(1) and it is not just a matter of personal injury.

8 WORKING OF THE ICC

- 8.1 KINDUZ as a strong believer in good conduct shall have an “Internal Complaints Committee” (ICC) to receive, investigate, deal and take necessary corrective steps including disciplinary action in respect of the associate(s) against whom sexual abuse/discrimination charges are levelled.
- 8.2 The committee shall be headed by a Woman and which contains Woman members not less than half of the total members in the committee who are direct employees of the Company and should contain one member from outside of organization commonly a social activist and one from management who is a permanent member of ICC.
- 8.3 If the complaint is raised against a Committee member by the Complainant, the Committee shall ensure that the defendant should not be the part of the Committee and not allowed to be part of the proceedings / interfere in the proceedings.



- 8.4 Committee members shall hear the Complainant and record their allegations. The Complainant/defendant can submit any corroborative material with a documentary proof, written material as relevant, in original which is self-attested to substantiate his / her complaint. If the Complainant (if Female) does not wish to depose personally due to embarrassment of narration of event, a co-employee of the same gender with whom he/she is comfortable with shall meet and record the statement.
- 8.5 Thereafter, the defendant shall be called for a deposition before the Committee and an opportunity will be given to him/her to give an explanation, where after, an “Enquiry” shall be conducted and concluded.
- 8.6 In case the complaint is proved true, the organization shall initiate necessary action as recommended by the ICC Committee. KINDUZ management reserves the right to refer the case to a higher regulatory Complaints Committee or any appropriate authority as per the seriousness of the complaint, as per the law of the land.
- 8.7 The committee shall complete the “Enquiry” within 10 working days from the date of complaint and communicate its findings and its recommendations for action to the HR Department.
- 8.8 In case the Committee finds the degree of offence coverable under the local Criminal law, then this fact shall be mentioned in its report and appropriate action shall be initiated by the Management, for making a Police Complaint as per the law of the land.
- 8.9 KINDUZ Internal Complaints Committee is guided by the rules and regulations, given separately for this in its formation, functions, authority and dealing with the cases involving sexual abuse and discrimination of KINDUZ associates.
- 8.10 Counselling and moral support will be provided to the victim to help them back to their normal life by ICC.
- 8.11 As per the existing act, any person responsible for the management, supervision and control of the workplace is the employer. Management includes the person or board or committee responsible for formulation and administration of policies for such organization. Thus, about the above, the person discharging contractual obligations with respect to his or her employees is the employer. Hence KINDUZ wants its associates to understand and take appropriate steps to prevent occurrences of sexual abuse/ harassment under their control.
- 8.12 KINDUZ helps the victim if he/she chooses to file a complaint under IPC or any other law, cause to initiate action under the IPC or any other law against the perpetrator or if the aggrieved associate so desires, where the perpetrator is not an employee in the workplace at which the incident of sexual harassment took place.
- 8.13 KINDUZ monitors and pursues the timely submission of reports by the ICC in all relevant cases.
- 8.14 KINDUZ after receipt of the investigation report from the ICC shall take appropriate disciplinary steps to act against the offender.

9 ICC COMMITTEE CONSTITUTION

9.1 ICC committee at KINDUZ consists of the following members:

	Name	Designation and Contact Details
1	Karuna Vaddadi	Independent Chartered Accountant Email: karuna2010@yahoo.co.in Phone: +91 9848473477
2	Shilpa Roy Kota	Chairperson of ICC and Director, KINDUZ Email: shilpa.kota@kinduz.com Phone: +91 9246185187
3	Radha Krishna Murthy Kota	Director, KINDUZ Email: murthy.kota@kinduz.com Phone: +91 9391359384



10 VIOLATION REDRESSAL MECHANISM

- 10.1 Any associate who observes any violation to this policy should report it to ICC through the contact details mentioned above.
- 10.2 Please refer to Violation Redressal Policy for more details on the intent and the process followed.

11 PREVENTIVE STEPS

- 11.1 KINDUZ shall take all reasonable steps to ensure prevention of Discrimination & sexual harassment at work. Such steps shall include:
 - 11.1.1 Circulation of the policy in Works locations on Sexual harassment and discrimination to all direct/indirect stakeholders as possible.
 - 11.1.2 Conduct periodic in-house training on sexual harassment and discrimination.
 - 11.1.3 Guidelines will be displayed to create awareness of the rights of all employees.
 - 11.1.4 Widely publicize that the Sexual Harassment and discrimination is a crime & will not be tolerated.
 - 11.1.5 Names and contact numbers of members of the ICC committee will be prominently displayed in all the Offices and work areas.

12 DOCUMENT CONTROL

Version Number	Date	Modification	Approved By
1.0	1 st January 2009	Released	Global Value Head
1.1	1 st July 2017	Updated to KINDUZ branding template	Global Value Head
1.2	10 th December 2017	<p>Additions:</p> <ul style="list-style-type: none">• Definition• Overview• Objective• Preventive Steps• ICC Committee Details <p>Modifications:</p> <ul style="list-style-type: none">• Guidelines for Reporting Harassment• Violation Redressal Mechanism <p>Deletions:</p> <ul style="list-style-type: none">• No deletions made	Global Chief Executive Officer