

## **Policy for Prevention of Sexual Harassment Version 3.0**

### **PURPOSE**

Talisma Corporation Private Limited, (the "Company" or "Talisma") is committed to providing a supportive, positive work environment free of sexual and other types of harassment based on protected categories. Employees are expected to treat others with respect and to refrain from harassing or intimidating behaviour.

This Policy for Prevention of Sexual Harassment (hereinafter the "**Policy**") is made in accordance with the statutory requirements set out in the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and the Rules made thereunder (hereinafter the "**POSH Act**"). However, this Policy goes further to provide redress against sexual harassment to all employees and persons operating for and on behalf of Talisma irrespective of gender. For the purpose of this Policy, the term 'employees' shall include all permanent and temporary employees, probationers, trainees, apprentices and also contract workers or vendors/consultants operating for and on behalf of the Company.

This Policy applies not only to behavior in Talisma offices, but any time those covered by this Policy interact on a work-related basis including but not limited to third party premises, vehicles, off site meetings, public venues, business trips and business-related social functions, and online platforms.

This Policy, which takes effect on February 12, 2024, supersedes and replaces all prior Talisma policies for prevention of sexual harassment. Employees are expected to comply with this Policy at all times. The HR Department and the Internal Committee are available for advice and will assist in general administration of the Policy.

### **SCOPE**

This Policy applies to any allegations of sexual harassment made by an employee, client, or visitor against an employee if the conduct occurred on the premises of the Company, or during the course of the employee's work for the Company. In case of an allegation of sexual harassment being made against a contract worker, the Company will work with the direct employer of the alleged offender to decide how the matter should be addressed.

Behaviour that could constitute sexual harassment includes but is not limited to:

- Unwelcome sexual advances or requests for sexual favors;
- Sexually suggestive remarks or innuendos; serious or repeated offensive remarks; inappropriate questions or remarks about a person's sex life;
- Showing pornography;
- Display of sexual or offensive pictures, posters, MMS, SMS, messaging services such as WhatsApp, or emails;
- Intimidation, threats, blackmail around sexual favors;
- Unwelcome social invitations with sexual overtones; and
- Any other unwelcome physical, verbal or non-verbal conduct of sexual nature

Sexual harassment may also be one or a series of incidents involving unsolicited and unwelcome sexual advances, requests for sexual favours or any other verbal or physical conduct of a sexual nature (whether directly or by implication). Actions/behaviours that could amount to sexual harassment include but are not limited to (a) an implied or explicit promise of preferential

treatment in employment; (b) an implied or explicit threat of detrimental treatment in employment; (c) an implied or explicit threat about present or future employment status; (d) interference with an employee's work or creating an intimidating, offensive or hostile work environment; (e) humiliating treatment likely to affect an employee's health or safety.

Note that sexual harassment can occur:

- (a) between members of the same or opposite sex, regardless of their sexual orientation
- (b) between vendors, contractors, and/or employees
- (c) offsite at work-related events

## **RAISING ISSUES**

If you have been subjected to behaviour that you believe may violate this Policy, you may:

- Tell the person engaging in the behaviour to stop, but only if you feel completely comfortable doing so. Even if you feel comfortable to take this step, you may also let HR and/or the Internal Committee know.
- Let the Internal Committee know by submitting a written complaint to [vinuthas@talisma.com](mailto:vinuthas@talisma.com). The Internal Committee will investigate the matter to the extent appropriate.
- If the person engaging in the behaviour is a vendor or customer employee, the Company will work with the direct employer of the alleged offender to decide how the matter should be dealt with.

The Internal Committee has been established to ensure the Company is addressing sexual harassment complaints in a timely manner. The names and contact information of the current committee members are set out at the end of this Policy.

## **Procedures for Resolution, Settlement or Prosecution of Acts of Sexual Harassment**

### ***Complaints***

The Internal Committee will investigate formal written complaints of sexual harassment as appropriate and recommend such steps as may be warranted, including providing interim relief. Formal written complaints (email or letter) should be sent to [vinuthas@talisma.com](mailto:vinuthas@talisma.com) or to any member of the committee directly. In certain special circumstances, where the victim is unable to make the complaint, the Internal Committee may allow an authorized person to make the complaint in accordance with applicable law.

If submitting a written complaint, please disclose your name, and contact information, along with all relevant details, including the name of the alleged perpetrator, details of the alleged incident, any supporting information and documents available to substantiate the incident, including but not limited to names and contact details of possible witnesses. Any written complaint must be submitted within three months from the date of the occurrence of the alleged incident and in case of series of incidents, within a period of 3 months from the date of the last incident. The Internal Committee may, at its sole discretion, extend this time limit by up to 3 more months if it is satisfied that the circumstances were such which prevented the victim from filing of the complaint within the period of 3 months.

### ***Processing the Complaint***

In the course of the investigation, witnesses and other appropriate parties may be notified and asked to participate as appropriate. As a first step, the Internal Committee will meet with the complainant, generally within three working days of the receipt of the complaint to hear the complainant and record his/her allegations.

The Internal Committee shall normally forward a copy of complaint to the respondent within 7 working days of receipt of the complaint, or within such time period as it may deem reasonable and give him/her an opportunity to submit a written explanation, if he/she so desires. The respondent shall file his/her reply to the complaint along with his/her list of documents and names and addresses of witnesses within a period of 10 working days from the date of receipt of the complaint from the Internal Committee or such other period that the Internal Committee may specify.

### ***Conciliation***

The Internal Committee may, before initiating an inquiry and **at the request of the complainant**, take steps to settle the matter between the complainant and the respondent through conciliation, however no monetary settlement shall be made as a basis of conciliation. Where a settlement has been arrived at, the Internal Committee shall record it, and forward the same to the Company to take action as specified in the recommendation. Where a settlement is arrived at, no further inquiry shall be conducted by the Internal Committee.

### ***Inquiry***

Where the victim informs the Internal Committee that any term or condition of the settlement arrived at as part of the conciliatory proceedings has not been complied with by the respondent, or if the victim does not request for conciliation, or if the conciliation process fails, and where the respondent is an employee, the Internal Committee would proceed to make an inquiry into the complaint in accordance with the provisions of this Policy. Quorum for the inquiry proceedings shall be three members of the Internal Committee including the Presiding Officer. Both the respondent and the complainant (unless specifically exempted by the Internal Committee in writing) shall be required to attend every hearing. If either party fails to attend three consecutive hearings without sufficient cause, the Internal Committee may terminate the inquiry or pass an ex parte order with 15 days' notice.

While conducting the inquiry, the Internal Committee shall call upon such witnesses as it may deem appropriate and provide a reasonable opportunity of being heard to both the victim and the complainant. The Internal Committee will endeavour to complete the investigation within 90 (ninety) days.

The Internal Committee shall keep a log of all the proceedings under this Policy as well as other records required by the POSH Act and prepare a report of its findings and recommendation for action to be taken by the Company. Corrective action will be taken as appropriate. The investigation process will be conducted as confidentially as possible. The victim/complainant, respondent, witnesses and members of the Internal Committee who are employees of the Company who breach the confidentiality of the inquiry process would be liable for disciplinary action up to and including termination of employment.

Talisma does not tolerate retaliatory behaviour against individuals who make complaints of workplace harassment or who assist in any investigation of such complaints.

Any questions about this Policy should be directed to HR.

### ***Interim Relief***

During the pendency of the inquiry, on a written request being made by the victim, the Internal Committee may recommend to the Company to: (a) transfer the complainant to another office, or (b) transfer the respondent to another office, or (c) grant leave to the complainant up to a period of three months, or (d) restrain the respondent from reporting on the work performance of the complainant or writing the complainant's appraisal/ confidential report(s). The Internal Committee may also recommend to the Company to suspend the respondent with full pay during the pendency of the inquiry if the circumstances so merit.

### **RESOLUTION**

If the Internal Committee determines that someone has engaged in sexual harassment, disciplinary actions include but are not limited to:

- Directing the respondent to provide a written apology to the victim;
- Written warning;
- Requirement of training and/or counseling
- Loss of pay (including any accrued bonus or future bonus);
- Demotion;
- Transfer;
- Denial of promotion;
- Suspension;
- Dismissal or termination of employment or engagement; and/or
- Other appropriate action

The Internal Committee may also recommend to the Company to deduct a compensatory sum from the salary of the respondent and pay it to the complainant or the respondent may be directed to pay the compensatory amount to the complainant.

The decision of the Internal Committee shall be final and binding in this regard.

Notwithstanding the above, if the victim desires to take criminal action against the respondent, there shall be no objection by the Internal Committee and the Company. In such an event, the Company will attempt to provide all reasonable assistance to the victim. The Company may also choose to take criminal action against the respondent.

If any accusations are found to be false or made with malicious intent or false evidence, the consequences set out above shall be applicable to the complainant as well. However, a mere inability to substantiate a complaint or provide adequate proof will not attract action against the complainant.

Talisma shall endeavour to act on the recommendations of the Internal Committee within 60 (sixty) days of the receipt of the final report of the Internal Committee and shall inform the Internal Committee and the complainant of the same. Post implementation of the actions, Talisma shall also follow up with the complainant to ascertain whether the behaviour has in fact stopped, the solution is working satisfactorily and confirm that no victimization of the complainant is occurring.

## Internal Committee

The members of the Internal Committee as of 12<sup>th</sup> of February, 2024 and their contact details are as provided below:

Srl. No.	Name	Designation	Mobile	Email id
1	Ms. Vinutha S	Presiding Officer		<a href="mailto:vinuthas@talisma.com">vinuthas@talisma.com</a>
2	Ms. Shwetha Ramachandran	Internal Member		<a href="mailto:shwethar@talisma.com">shwethar@talisma.com</a>
3	Ms. Ramadevi M Ithal	Internal Member		<a href="mailto:ramadevii@talisma.com">ramadevii@talisma.com</a>
4	Mr. Gareth Francis	Internal Member		<a href="mailto:gareths@talisma.com">gareths@talisma.com</a>
5		External Member		<a href="mailto:richas@gmail.com">richas@gmail.com</a>

The members on this committee change from time to time in the Company's sole discretion and an updated roster will be posted in the office premise and shared by email communication. The Internal Committee email is [vinuthas@talisma.com](mailto:vinuthas@talisma.com).

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## Document Control

Version Control					
Version	Date	Author	Reviewer	Approver	Notes
1.0	November 26, 2018	Aishwarya Nair (outside legal counsel)	Nija V. (Manager-HR)	Jhilik Sharma (VP, HR & Learning) Thomson Mathew C. (VP, Finance & Operations)	Updated document
1.1	April 2, 2020	Aishwarya Nair (outside legal counsel)	Nija V. (Manager-HR)	Jhilik Sharma Thomson Mathew C.	Updated document
2.0	July 15, 2022	Aishwarya Nair	Alyssa Senzel, Deputy General Counsel	Jhilik Sharma, Thomson Mathew, Nicole Knox (Director, Global HR Consulting & Delivery)	Policy rewritten and combined for Anthology India
3.0	12 <sup>th</sup> of February, 2024	Chandan Singhania (Company Secretary and Legal Counsel)	Chandan K (External Legal Counsel)	Rajendra CM (Director) and Pratibha Rajendra (Director) in the board meeting held on 12 <sup>th</sup> of February 2024	Policy rewritten and appointment of new Internal Complaint Committee members.

<b>Distribution List</b>		
<b>Name</b>	<b>Organization</b>	<b>Job Title</b>
Employees of Talisma	Talisma Corporation Private Limited	Employees