



Prevention of Sexual Harassment Policy

Maveric Systems

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MAVERIC SYSTEMS

Started in 2000, Maveric Systems helps global banking and fintech leaders drive business agility through effective integration of development, operations, and quality engineering initiatives. Our strong banking domain competency combined with expertise across legacy and new age technology landscapes makes us a preferred partner for customers worldwide.

We offer Product Implementation, Integration and Quality Engineering services across Digital platforms, Banking solutions and Regulatory systems. Our insight led engagement approach helps our clients quickly adapt to dynamic technology and competitive landscapes with a sharp focus on quality.

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Revision History

Author	Date	Version	Comments
Ginni Rana	25.07.2016	1.0	This policy explains about the non-acceptable behaviour at workplace and also describes about various do's and don'ts. A complaint redressal committee and a mechanism has been set up for the same.
Ginni Rana	09.05.2017	1.1	Excluded Santhosh Kumar K from the Redressal Committee and added Faariz B in the Committee
Amritha S E	18.12.2019	1.2	<ul style="list-style-type: none"> Update ICC members Term "Employees" changed to Associates in the policy document.
Subhashree M	26.08.2020	1.3	<ul style="list-style-type: none"> Sexual harassment during WFH scenarios detailed in the policy
Praveena P	19-Apr-21	1.4	Updated based on current organisation template change
Santhoshi N	19-Apr-21	1.4	Reviewed & Approved
Praveena P	01-Dec-21	1.5	Updated the new committee members and removed the inactive associates
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Praveena P	01-Jul-22	1.6	Revisited the document and found no changes are needed
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Bhargavi S	08-Jul-22	1.8	Updated the ICC members
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Kapila V	04-Mar-24	2.0	Updated the latest compliant redressal members
Lalitha & Santhoshi N	04-Mar-24	2.0	Reviewed & Approved

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1 Purpose

Maveric Systems Ltd is committed to provide a healthy work environment that ensures every Associate is treated with dignity, respect and with equitable treatment.

The Company is also committed to promote a work environment that is conducive to the professional growth of its Associates and encourages equality of opportunity and hence will not tolerate any form of sexual harassment.

The occurrence of sexual harassment in the workplace has been taken note of, and the Hon'ble Supreme Court has laid down guidelines on its prevention and deterrence in 1997. In deference to the aforesaid guidelines the Company is framing Policy to achieve the following Objectives.

- a. To promote a safe, congenial, positive and productive work environment
- b. Not to tolerate verbal, physical or psychological conduct of a sexual nature by any Associate or stakeholder that directly or indirectly harasses, disrupts, or interferes with another's work performance or that creates an intimidating, offensive, or hostile environment

The Company strongly believes any kind of harassment that is unchecked has the potential to hurt the company's operations through decreased productivity and increased Associate turnover. Therefore, the organization is committed to take all necessary steps to ensure that its Associates are not subjected to any form of sexual harassment

2 Effective date

Following the enactment of THE SEXUAL HARASSMENT OF WOMEN AT WORKPLACE (PREVENTION, PROHIBITION AND REDRESSEL) ACT, 2013 by the Government of India, Ministry of Law and Justice on 23rd April 2013, the following policies and procedures will come into force with effect from 1st April, 2016.

3 Scope

This Policy extends to all Associates of the Company, whether on probation or permanent, including those on deputation, contract, part-time or working as Consultants, trainees irrespective of whether sexual harassment is alleged to have taken place within or outside Company's premises. This Policy shall also apply to all visitors and vendors of the company if sexual harassment is alleged to have taken place while such vendor or visitor was inside the Company's premises.

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The Company will not tolerate sexual harassment, if engaged in by clients or by suppliers or any other business associates.

The workplace includes:

- All offices or other premises where the Company's business is conducted
- All company-related activities performed at any other site away from the Company's premises
- Any social, business or other functions where the conduct or comments may have an adverse impact on the workplace or workplace relations
- Any official transportation for business purposes.

Due to the advent of remote working practices; including work from home scenarios and work going beyond normal working hours in times of need, the work place will also include the following:

Apart from the above listed workplace scenarios, Workplace shall here also include all forms of "Work-Space" including "Cyber-space" and "Telephonic modes" and hence shall also encompass the following:

- Any digital and/or non-digital platform used to connect with peers/vendors/or any parties associated with Maveric.

Work from home and/or work not limited to physical office premises only

4 Definition of Sexual Harassment

- I. "Sexual Harassment" shall mean and include any unwelcome sexual advances, requests for sexual favours, and other verbal and physical conduct of a sexual nature when:
 - a. Submission to that conduct is made either explicitly or implicitly, a term or condition of an individual's employment;
 - b. Submission to or rejection of that conduct by an individual is used as the basis of employment decisions affecting the individual; or
 - c. The conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile, or offensive working environment
- II. This conduct includes but not limited to:
 - a. Unwanted and unwelcome physical contact of any kind or any conduct including flirting, touching, making undesirable advances, or propositions;
 - b. Verbal harassment of a sexual nature, such as lewd comments, sexual jokes, innuendos or references, and offensive personal references;

- c. Demeaning, insulting, intimidating, or sexually suggestive comments (verbal or written) about an individual's personal appearance or electronically transmitted messages;
 - d. The display in the workplace of demeaning, insulting, intimidating, or sexually suggestive objects, pornography, pictures, or photographs.
 - e. Displaying objectionable material on the screen or in the visibility during video calls,
 - f. Displaying un-acceptable screensavers with sexual connotations.
 - g. Insisting associates to turn on video while calling,
 - h. Asking personal questions on official platforms.
 - i. Calling/texting a person during late hours/non-working hours without any justification.
 - j. Taking screenshots of colleagues during video calls,
 - k. Displaying suggestive words on attire like t-shirts during video calls, etc.
 - l. Extensive usage of SMS, texts on social sites for business conversations.
 - m. Any form of cyber harassment, harassment through phone-calls, SMS etc
- III. Based on these criteria, sexual harassment typically is categorized into two types:
- a. Quid pro quo sexual harassment, which means something in return or an exchange of one thing for another
 - In the workplace, quid pro quo sexual harassment takes place if sexual favours are asked in exchange for any kind of special treatment on the job. Threatening an associate if he/she does not consent to such sexual advances or favours also amounts to sexual harassment. The act of 'asking' may either be verbal or implied and the 'sexual conduct' may be verbal or physical. But, in either case, it must be unwelcome
 - For e.g.: Direct or implied requests or offers by any associate for sexual favours in exchange for actual or promised job benefits such as favourable reviews, salary increases, promotions, increased benefits, or continued employment constitutes sexual harassment.
 - b. Hostile work environment includes
 - Hostile environment sexual harassment occurs when either speech or conduct of a sexual nature takes place, and is seen or perceived as offensive and interferes with the work performance of the recipient, or any one or more associates
 - Hostile environment sexual harassment may also include intimidating or harassing conduct that is directed at an individual, or a group of individuals
 - It will also mean related retaliation which includes marginalizing someone in the workplace with regard to his / her roles and responsibilities, socially ostracizing, intimidating someone physically, psychologically, and emotionally or someone close to or related to the victim

- IV. Sexually harassing or offensive conduct in the workplace, by or against the Associates whether committed by supervisor, managers, non-supervisory Associates, or non- Associates, is strictly prohibited

Any of the above conduct or other offensive conduct (but not restricted to), directed at individuals because of their race, caste, colour, creed, religion, physical disability, family background, pregnancy or sexual orientation and age is also strictly prohibited

5 Responsibility of the associate

Any Associate who believes that a supervisor's, manager's or other Associate's actions or words constitute unwelcome sexual harassment has a responsibility to report or complain about the situation as soon as possible. The report or complaint requires to be made to the Complaints Committee specifically constituted for this purpose.

6 Prevention Action

The Company will take reasonable steps to ensure prevention of sexual harassment at work which may include circulating applicable policies and other relevant information to all associates, including to all new hires.

7 Complaint redressal committee

An appropriate complaint mechanism in the form of "Complaints Redressal Committee" has been created in the Company for time-bound redressal of the complaint made by the victim. Every complaint received shall be forwarded to complaint redressal committee formed under the policy for redressal. Decision taken by the internal committee will be final and binding.

Role of the Committee:

- Review the complainant's complaint in a fair and objective manner
- Help the complainant and the accused find a way of solving the problem
- Determine the facts of the case with the individuals concerned and the witnesses, if any, and prepare a report with the findings
- Be bound in the principle of natural justice and be unbiased in their evaluation

Note: Please refer to Annexure A to find the details about the Committee members

8 Complaint redressal Mechanism

- a. The Complaints Committee may investigate and handle the received complaint in accordance with the procedure laid down. All complaints of harassment will be investigated promptly and in impartial and confidential manner. Associates shall cooperate in any investigation so called for:
 - I. Any Associate, who feels he/she is being sexually harassed directly or indirectly, may give a complaint of the alleged incident to any member of the Committee **within three months** of occurrence of the incident
 - II. The Chairperson or any Member of the Complaints Redressal Committee can render reasonable assistance to the person for making complaint in writing, in case they are unable to do so
 - III. Complaints Committee on receipt of such written complaint, may, if require ask the aggrieved person to furnish additional information about the alleged harassment
 - IV. Complaints may be made in writing and shall be submitted to the members of the committee. Copy of complaint along with supporting documents and names of the witness (if any) shall be sent to Complaints Redressal Committee at ethics@maveric-systems.com
 - V. On receipt of such complaint, Committee shall investigate in detail into the matter of the incident occurred. The Complaint committee shall have the right to call the person against whom the complaint is made or any other witnesses as when necessary
 - VI. Complaint Committee shall have the right to terminate the enquiry or give ex-parte decision on the complaint, if the Respondent or complainant remains absent for 3 consecutive hearings, without sufficient cause
 - VII. Each complaint will be resolved within a period of 90 days from the date the complaint is received by the Complaints Committee
 - VIII. The parties shall not be allowed to bring any legal practitioner to represent them in their case at any stage of the proceedings before the Complaints Committee decision
 - IX. Where the aggrieved person 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 their written consent within 3 months of the incident
- b. The Internal Committee may before initiating an inquiry, and at the aggrieved person's request, attempt to settle the matter through conciliation. However, Complaints Committee shall ensure that:
 - I. Monetary settlement will not be made as a basis of conciliation

- II. Where a settlement has been arrived, the settlement terms shall be signed by both the parties and shall be provided with a copy of it

Where, a settlement is arrived as mentioned hereinabove, no further enquiry shall be conducted by the Internal Complaints Committee.

- C. During such enquiry, upon written request by the aggrieved person, the committee may at its discretion recommend:
 - I. To transfer the aggrieved person or the respondent to any other workplace;
 - II. Grant leave to the aggrieved person of up to three months which is in addition to leave to which she is otherwise entitled

Provided, the aggrieved person has to tender justified reason for such transfer or leave, such as threat to work in the workplace.

9 Action

- a. The Committee shall on completion of the enquiry provide a report of its findings within 10 days from the date of completion of the enquiry and such report shall be made available to the concerned parties
- b. If the allegation against the respondent has not been proved, the Committee may recommend that no action needs to be taken in the matter
- c. If the Internal Complaints Committee arrives at the conclusion that the allegation against the respondent has been proved, it shall recommend to:
 - Take action for sexual harassment as a misconduct
 - To tender written apology to the complainant, issue warning, withholding of promotions / increments of the Respondent, terminating the Respondent
 - To deduct from salary / wages of the respondent or issue direction for payment; such sum as it may consider appropriate to be paid to the aggrieved person or to their legal heirs, as it may determine
 - Such action will be taken within 90 days of the receipt of report.

10 False accusations

- a. The complaint of sexual harassment made by any Associate shall be taken up with utmost seriousness by Company. However, there shall be zero tolerance for any false accusation
- b. If the Complaint Committee comes to a conclusion that the allegation was made with malicious intent or the aggrieved person or any other person making the complaint on behalf of the aggrieved person produced false or forged or misleading documents to prove his/her case, the Complaint Committee may recommend action to be taken against the person who has made the complaint. In the event, the complaint does not fall under the purview of Sexual Harassment or the complaint does not mean an offence of Sexual Harassment, the same would be dropped after recording the reasons thereof. However, based on the incident the same shall be notified to the Disciplinary Committee for any further action
- c. A similar recommendation for taking action would be recommended against any witness whom the Internal Complaint Committee concludes, that he/she has given false evidence or produced forged or misleading documents

It is to be noted that this statement is not intended to discourage Associates from coming forward with any complaints. Maveric Systems recognizes and expects that some claims may be difficult to prove or support, or may not in fact be found to raise to the level of seriousness deemed necessary to constitute Sexual Harassment. These types of complaints will not be considered to be false accusations

11 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 though it shall not be guaranteed.

12 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.

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The Complaint Redressal Committee shall prepare an annual report with the following details and shall submit the same to the Company to include in its Annual report:

- a. Number of complaints of sexual harassment received during the year;
- b. Number of complaints disposed off during the year;
- c. Number of cases pending for more than 90 days;
- d. Number of workshops or awareness program against sexual harassment carried out;
- e. Nature of action taken by the employer

13 Conclusion

Complaints relating to Sexual Harassment shall be handled and investigations will be conducted under the principles of natural justice on the basis of fundamental fairness, in an impartial and confidential manner so as to protect the identity of all viz. the person bringing the charge, potential witnesses, and the person accused of improper behaviour. Also, all efforts shall be taken to ensure objectivity and thoroughness throughout the process of investigation. The identity and address of the aggrieved person, respondent and witnesses must not be published or disclosed to the public or media. The decision of Company shall be final and binding on all.

In conclusion, the Company reiterates its commitment to providing its Associates, a workplace free from harassment/discrimination and where every Associate is treated with dignity and respect.

Company may, at its discretion make any alteration or amendment or rescind any of the clauses of this Policy as and when it finds it necessary to do so as long as it complies with the Act. Any such alterations or amendment or rescinding will be intimated to the Associate.

14 Policy Changes / Reviews

This policy will be reviewed based on the following criteria:

- Annual basis
- Major organization & structural changes
- Auditors feedback
- Sr. Management & business feedback
- Maveric associates' feedback

15 Annexure

A. Complaints Redressal Committee

Chairperson	Committee Members	Email ID	Location
Santhoshi Nagarajan	Aditya Joseph Nathan (QE)	adityaj@maveric-systems.com	Bangalore
	Shailendra Kumar (DAT)	shailendraku@maveric-systems.com	Bangalore
	Dolon Chapa Paul (QE)	dolonc@maveric-systems.com	Bangalore
	Divya Murthy (QE)	divyamurthy@maveric-systems.com	Chennai
	Sunil Peter (ITO)	sunilpeter@maveric-systems.com	Chennai
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	Rashmitha Das – External Consultant		