



# **TATA COMMUNICATIONS**

## **PREVENTION OF SEXUAL HARASSMENT CHARTER - INDIA**

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*This policy version supersedes any other policy communication with regard to POSH Policy - Human Resources*



## PREVENTION OF SEXUAL HARASSMENT CHARTER - INDIA

In response to specific requirements as set forth in the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, read with the rules made there under (the “**Sexual Harassment Act**”), this charter (hereafter “**Charter**”) deals with matters that pertain to prevention, prohibition and redressal of the sexual harassment of women at the workplace in India.

In relation to above, this Charter applies to the following Indian Tata Communications Companies:

- i. Tata Communications Limited;
- ii. Tata Communications Transformation Services Limited;
- iii. Tata Communications Collaboration Services Private Limited;
- iv. Novamesh Limited;
- v. Solutions Infini Technologies (I) Pvt Limited; and
- vi. Any and all other direct or indirect Indian subsidiaries of Tata Communications Limited that may form part of Tata Communications group of companies from time to time.

Each of the above companies have adopted this Charter that provides for prevention, prohibition and redressal of the sexual harassment of women at the workplace. Each of the above entities are individually also referred to as “Company” in this Charter.

### 1. SEXUAL HARASSMENT

In accordance with the provisions of the Sexual Harassment Act, the term “Sexual Harassment” means unwelcome acts or behavior (whether directly or by implication) such as physical contact and advances, demands or requests for sexual favors, making sexually coloured remarks, showing pornography or any other unwelcome verbal, non-verbal or physical conduct of a sexual nature when:

- i. submission to such conduct is made either explicitly or implicitly a term or condition of an individual’s employment, for preferential or detrimental treatment or as a threat to such employment;
- ii. submission to or rejection of such conduct is used as the basis for employment decisions affecting the individual including the individual’s present or future employment status;
- iii. such conduct has the purpose or effect of unreasonably interfering with an individual’s work performance or creating an intimidating, hostile, or offensive working environment; or
- iv. such conduct results in humiliating treatment which is likely to affect the individual’s health or safety.

### 2. WORKPLACE

The term “Workplace” includes all those places which a woman needs to visit by virtue of her work. It includes extended workplace too while travelling, such as place of stay and work, venue of work-related events (including conferences, work functions, office parties and business/field trips) as well as any transportation provided by the Company for undertaking such travelling. It also includes “Home” from where one is working will also be considered as workplace.

### 3. AGGRIEVED PERSON

The term “Aggrieved Person”, in relation to a Workplace, means any woman of any age, whether employed or not, who alleges to have been subjected to any act of Sexual Harassment by another person.



#### 4. EMPLOYEE

The term “Employee” means a person employed at a Workplace for any work on regular, temporary, *ad hoc* or daily wage basis, either directly or through an agent, including a contractor, with or, without knowledge of the principal employer, whether for remuneration or not, or working on a voluntary basis or otherwise, whether the terms of employment are expressed or implied and includes a co-worker, a contract worker, probationer, trainee, apprentice or called by any other such name.

#### 5. SPECIFIC EXCLUSION

For avoidance of doubt, any matter that pertains to sexual harassment of a male employee at a Workplace will be dealt in accordance with the Company’s Dignity in the Workplace Policy.

#### 6. GRIEVANCE PANEL

Each Company has created respective Grievance Panel(s) (each, a “Panel” or “Grievance Panel”) in the manner set out in Appendix 1 of this Charter, to investigate and address complaints of suspected Sexual Harassment of any Aggrieved Person at the Workplace.

The details of the jurisdiction of each Panel in relation to the offices of the respective Companies are set out in Appendix 1 and may be updated from time to time to reflect changes in the constitution, jurisdiction of the Grievance Panel and/or changes in the Indian subsidiaries of Tata Communications Limited.

It is hereby clarified that for the purposes of the Sexual Harassment Act, each Panel constituted in accordance with the terms of this Charter shall be considered as an Internal Complaints Committee.

The most recent version of the Charter can be found on the Company’s intranet [here](#). The Company shall provide adequate guidelines and programs for educating Employees and creating awareness on the issues of Sexual Harassment at Workplace.

The Grievance Panel shall, at a minimum:

- i. Ensure the implementation of the Charter/policy concerning prevention, prohibition and redressal of Sexual Harassment of women at Workplace and do whatever is necessary to prevent, prohibit, deter and redress such Sexual Harassment in both letter and spirit.
- ii. Suggest steps to the Company for preventing, prohibiting, redressing matters that pertain to Sexual Harassment and creating awareness regarding the issues of the same within the Company.
- iii. Issue guidelines to the Company on legislation as they relate to such harassment.
- iv. Operate as the enquiry authority for all complaints received from or on behalf of Aggrieved Person (to the extent the alleged offender or respondent is an Employee of the Company).
- v. Redress any and all complaints of Sexual Harassment to the best of the Panel’s ability and judgment.
- vi. To the extent the alleged offender or respondent is an Employee of the Company, investigate promptly and thoroughly, all complaints of Sexual Harassment and deal appropriately with the offending Employee.
- vii. Provide all parties with an opportunity to be heard as part of the enquiry.
- viii. Take preventive action to remedy known or suspected hostile or offensive work environments.
- ix. Take corrective action to reflect the severity of the conduct. The appropriateness of remedial action will depend on the severity and persistence of such Sexual Harassment and the effectiveness of any initial remedial steps.



- x. In case of occurrences of Sexual Harassment against any woman Employee deputed to a client or third party site or due to the acts or omissions of third parties, the Panel will take all reasonable steps to assist such Employee in terms of support and preventive action, including removing such Employee from the client site and returning them to the roles of the Company.
- xi. The Panel shall make follow-up enquiries, as necessary, to ensure the Sexual Harassment has not resumed or the Aggrieved Person is not being victimised and/or retaliated against in the Workplace.
- xii. Within ten days of the completion of the inquiry into the complaint of Sexual Harassment, Panel shall provide a written report of its findings to the Company's Global Head- Human Resources. The Panel shall in each calendar year prepare an annual report and submit the same to Company's Global Head-Human Resources. The annual report shall include the details as prescribed under the Sexual Harassment Act.
- xiii. Have access to Company data and Employee records, as needed.
- xiv. Have access to Company provided administrative assistance, including providing venues for Panel meetings, secretarial assistance, assistance in securing the attendance of witnesses or other Employees before the Panel, etc.

#### **Composition of the Grievance Panel**

- i. Generally, the Panel shall consist of six (6) / five (5) members, at least three (3) of whom shall be women of whom one (1) shall be independent from the Company ("Independent Member"). Not less than two (2) members shall be the Employees preferably committed to the cause of women or who have had experience in social work or legal background.
- ii. The chairperson shall be a senior woman Employee within the Company. The chairperson of the Panel shall be the "Presiding Officer", as defined under the Sexual Harassment Act. In the event that a senior level woman Employee is not available, the chairperson shall be nominated by the Company from other offices or administrative units of the workplace. In the event that any of the Companies do not have a senior level woman Employee to act as the chairperson, the chairperson from one of the other Panels of Tata Communications Limited shall be nominated. Notwithstanding anything herein to the contrary, a minimum of two (2) Employee members nominated by each Company to the Panel shall be the employees of that respective Company as required by the Sexual Harassment Act.
- iii. The Independent Member shall be from amongst non-governmental organisations or associations committed to the cause of women or a person familiar with issues relating to Sexual Harassment. The Company shall pay remuneration to the Independent Member on terms as may be prescribed under the Sexual Harassment Act.
- iv. A quorum of three (3) members is required to constitute a valid meeting of the Panel. For the avoidance of doubt, a quorum must include, at a minimum, the chairperson, the Independent Member and one another member.
- v. Meetings of the Panel may be held in person, over the phone or through video conferencing facilities.
- vi. The composition of the Panel shall be changed every two (2) years, except the Independent Member who shall be entitled to serve on the Panel for any additional one (1) year period at the election of the Company's Global Head - Human Resources. The Company's Global Head - Human Resources is authorized to approve any changes to the composition of the Panel due to organizational changes - resignation, change in role/location, conflict of interest matters, etc.



- vii. Information about all of the Panel members, including the chairperson, as well as a copy of the Dignity in the Workplace Policy and the Charter shall be published on the Company's intranet and made easily available to all Employees and in case of visitors visiting any of the Company's premises, at the Company's premises.

## 7. FILING A COMPLAINT

Any Aggrieved Person who believes she has experienced Sexual Harassment may file a complaint with the Panel in the manner set out below within three (3) months of the alleged incident, and in case of a series of incidents, within a period of three months from the date of the last incident.

- i. A written complaint along with supporting documents should be submitted to the Panel at [posh@tatacommunications.com](mailto:posh@tatacommunications.com) provided that where such complaint cannot be made in writing, the chairperson or any other members of the Panel will render all reasonable assistance for making the complaint in writing.
- ii. To the extent possible, the complaint should include the following:
  - 1) The Employee/s, and/or outside party or parties involved;
  - 2) The place/s where it happened (division, office);
  - 3) When did it happen: the date/s or a period of time;
  - 4) Type of concern or description (what happened);
  - 5) Who to contact for more information, if necessary; and/or
  - 6) Names and addresses of any witnesses of the alleged Sexual Harassment.
- iii. A legal heir, relative, friend or co-worker of such Aggrieved Person, or any person who has knowledge of such conduct, and who has the written consent of such Aggrieved Person, may file such a complaint on the Aggrieved Person's behalf.
- iv. The Panel may, for reasons to be recorded in writing, extend the time limit for filing a complaint if it is satisfied that the circumstances were such which prevented such Aggrieved Person from filing a complaint within three months.
- v. If an Aggrieved Person is unsure how to file a complaint of Sexual Harassment, she should immediately contact the Company's HR department.

## 8. PANEL PROCEDURES FOR ADDRESSING A COMPLAINT

- i. The Panel shall meet within five (5) business days of receiving a complaint to determine how to undertake the investigation of the complaint.
- ii. Within seven (7) business days of receiving a written complaint, the Panel will provide a copy of the complaint along with supporting documents & information provided with such complaint to the alleged harasser and require that such person shall file his/her response to the Panel within ten (10) business days along with the list of documents, and names and addresses of witnesses (if any).
- iii. If requested by the Aggrieved Person, the Panel may take steps to resolve the matter between the parties through conciliation. Where any resolution is arrived at as the result of such conciliation, the Panel will record the resolution and forward it to the Company's Global Head-Human Resources to take action as recommended and also provide copies to the respective parties. For the avoidance of doubt, the Panel does not have any authority to record or demand any monetary relief from the alleged harasser or the employer as basis of such conciliation.
- iv. The Panel in its discretion may provide immediate corrective relief by doing whatever it deems necessary to prevent any further harassment of the Aggrieved Person during the pendency of its investigation (e.g., counseling; support services; restoring lost employment benefits; transferring the victim or other Employees to alternative Workplaces; granting the alleged victim up to three (3) months of leave; or any other relief the Panel believes is necessary given the circumstances).



- v. The Panel shall give all interested parties, including the complainant, the alleged victim, and the alleged harasser the right to be heard. The alleged harasser may, if he/she desires, represent or plead through a representative, however, such representative must be an Employee of the Company. However, the parties shall not be permitted to bring in any legal practitioner to represent them in their case at any stage of the proceedings before the Panel.
- vi. The Panel will have the right to terminate the investigation as to give an *ex-parte* decision on the complaint if the complainant or respondent/alleged harasser fails, without sufficient cause, to present himself/herself for three consecutive hearings convened by the chairperson, provided that such termination or *ex-parte* order will not be passed without giving fifteen (15) days prior written notice to the party concerned.
- vii. The Panel shall complete its investigation within ninety (90) days of receiving a complaint.
- viii. The Panel will document the findings of the investigation along with its recommendations, if any, in the form of a written report within ten (10) days from the date of completion of the investigation.
- ix. If the Panel determines that the Aggrieved Person has in fact suffered Sexual Harassment, it will recommend appropriate disciplinary action against the Employee(s) engaging in the misconduct, including requiring a written apology, warning, reprimand or censure, withholding of promotion, pay rise or increment, or termination of service, and or recommend or take such other actions as may be permissible under any applicable laws including, but not limited to, the Sexual Harassment Act, such as :  
  
Recommend to the Company's Global Head – Human Resources to deduct from the compensation, salary, or wages of the Employee who has engaged in misconduct an appropriate amount to be paid to the Aggrieved Person or to the Aggrieved Person's legal heirs, in accordance with provisions of the Sexual Harassment Act.
- x. The Panel will also have the right to recommend any such disciplinary action against any person who makes a false or malicious complaint, knowing such complaint to be false or malicious, or produces any forged or misleading document, provided that mere inability to substantiate a complaint or provide adequate proof will not render a complaint false or malicious.
- xi. A copy of the report shall be made available to both the complainant and the respondent. The recommendations of the Panel, including any corrective preventive measures, shall be implemented by the Company's Global Head – Human Resources or the Company's designated disciplinary authority within a period of sixty (60) days of receipt of such recommendation.
- xii. Any person aggrieved by any recommendations of the Panel may prefer an appeal within ninety (90) days of any such recommendations, in accordance with the Sexual Harassment Act.
- xiii. Without limiting the generality of the foregoing, the Panel shall ensure confidentiality of the process and only involve those with a need to know or relevant to undertake the investigation. Any violation of the confidentiality obligations can result in disciplinary action against the concerned Panel member.
- xiv. Notwithstanding the forgoing, the Panel shall submit its reports to the Company and to all relevant governmental authorities, if required by law. The act of submitting statutorily required reports to the Company or to relevant governmental authorities will not be considered a breach of the Panel's confidentiality obligations.
- xv. The failure or refusal of any person to cooperate with or to interfere or misguide the Panel during its investigation may result in disciplinary action against that person as deemed appropriate.
- xvi. In the case of complaints which the Panel deems as outside its jurisdiction, like offences of a criminal nature under the Indian Penal Code, the Panel will provide all necessary assistance to the Aggrieved Person in filing such complaint with the appropriate legal authorities in accordance with the applicable laws.
- xvii. If an Aggrieved Person chooses to initiate proceedings in a court or tribunal, the Company shall take steps to support such person in the proceedings, including by providing Company data and Employee records.



Appendix 1

**CONSTITUTION OF GRIEVANCE PANELS**

<b>Grievance Panel - Tata Communications Limited</b>				
No.	Jurisdiction	Grievance Panel at Delhi	Grievance Panel at Mumbai	Grievance Panel at Pune
		All offices in North and East Region	All offices in the States of West Region except Pune	All offices in Pune and in the States of South Region
1	Chairperson	Alka Selot Asthana	Leena Solanki	Rashmi Naegamwala
2	Independent Member	Priya Sethi - For all offices in the state of North region Ishita Mukhopadhyay - For all offices in the state of East region	Neha Kedia - For all offices in Mumbai and West region except Pune	Jyoti Gokhale - For all offices in Pune Prof. Sivaranjani - For all offices in the state of South region
3	Member	Lalita Singh	Lalita Singh	Siddhartha Roy
4	Member	Nancy Arora	Nidhi Jalan Das	Sunandita Bose
5	Member	Vaishnavi Shukla	Vaishnavi Shukla	A Kalyani

<b>Grievance Panel - Indian subsidiaries of Tata Communications Limited</b>					
<b>Grievance Panel - Tata Communications Transformation Services Limited</b>			<b>Grievance Panel - Tata Communications Collaboration Services Private Limited</b>		
No	Jurisdiction	All offices in India	No	Jurisdiction	All offices in India
1	Chairperson	Awantika Bhardwaj	1	Chairperson	Alka Selot Asthana
2	Member	Mayuri Kalamkar	2	Member	Praveen Arora
3	Member	Apurwa Nidhi	3	Member	Zubin Adil Patel
4	Member	Tushar Shankar Hule	4	Member	Radhika Bhatnagar
5	Member	Dinesh Kumar	5	Independent Member	Neha Kedia - For all offices in Mumbai & West Region except Pune
6	Independent Member	Neha Kedia - For all offices in Mumbai & West Region except Pune Jyoti Gokhale - For all offices in Pune Priya Sethi - For all offices in the states of North region Ishita Mukhopadhyay - For all offices in the states of East region Prof. Sivaranjani - For all offices in the states of South region			Jyoti Gokhale - For all offices in Pune Priya Sethi - For all offices in the states of North region Ishita Mukhopadhyay - For all offices in the states of East region Prof. Sivaranjani - For all offices in the states of South region



Grievance Panel - Indian subsidiaries of Tata Communications Limited					
Grievance Panel - Novamesh Limited			Grievance Panel - Solutions Infini Technologies (I) Pvt Limited		
No	Jurisdiction	All offices in India	No	Jurisdiction	All offices in India
1	Chairperson	Rashmi Naegamwala	1	Chairperson	Leena Solanki
2	Member	Siddhartha Roy	2	Member	S Aravindan
3	Member	Rakhi Singh	3	Member	Aratrika De
4	Member	Shibani Shrungarkar	4	Member	Vidya Aley
5	Member	Allwyn Dsilva	5	Member	B R Nandana
6	Independent Member	<p>Neha Kedia - For all offices in Mumbai &amp; West Region except Pune</p> <p>Jyoti Gokhale - For all offices in Pune</p> <p>Priya Sethi - For all offices in the states of North region</p> <p>Ishita Mukhopadhyay - For all offices in the states of East region</p> <p>Prof. Sivaranjani - For all offices in the states of South region</p>	7	Independent Member	Sujatha Sukumaran
			6	Member	Pavan S Shetiya

Any of the above Grievance Panel Member can be contacted by sending an email to the attention of the respective member at [posh@tatacommunications.com](mailto:posh@tatacommunications.com)

\* For details of the States that are mapped to respective region, please refer enclosed Exhibit A



## Exhibit A to Appendix 1

	<b>Name of the State</b>	<b>Name of the Region</b>
1	Andhra Pradesh	South Region
2	Assam	East Region
3	Bihar	East Region
4	Chhattisgarh	East Region
5	Goa	West Region except Pune
6	Gujarat	West Region except Pune
7	Haryana	North Region
8	Himachal Pradesh	North Region
9	Jammu & Kashmir	North Region
10	Jharkhand	East Region
11	Karnataka	South Region
12	Kerala	South Region
13	Madhya Pradesh	West Region except Pune
14	Maharashtra	West Region
15	Meghalaya	East Region
16	New Delhi	North Region
17	Odisha	East Region
18	Puducherry	South Region
19	Punjab	North Region
20	Rajasthan	North Region
21	Tamil Nadu	South Region
22	Telangana	South Region
23	U.T. of Chandigarh	North Region
24	Uttar Pradesh	North Region
25	Uttarakhand	North Region
26	West Bengal	East Region