



**POLICY ON PREVENTION OF
SEXUAL HARASSMENT AT
WORKPLACE
[ADOPTED BY BOARD ON 05.02.2025]**

Description of the Document -

This document provides a brief description of the Sexual Harassment at EXCELSOFT.

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1. COMMITMENT:

Excelsoft Technologies Limited (hereinafter “Our Company” or the “Company”) including its subsidiaries is committed to providing a work environment free of any form of harassment or bullying ensuring that every employee is treated with dignity and respect and afforded equitable treatment.

The Company is also committed to promote and encourage a work environment that is conducive to the professional growth of its employees and encourages equality of opportunity.

The Company will not tolerate any form of sexual harassment and is committed to take all necessary steps to ensure that its employees are not subjected to any form of harassment on the basis of their gender. The Prevention of Sexual Harassment Policy has been formed to prohibit, prevent or deter the commission of acts of sexual harassment at workplace and to provide the procedure for the redressal of complaints pertaining to sexual harassment.

We also recognize that harassment and bullying can have very serious consequences for individuals and the Company which results in violation of fundamental rights of the Constitution of India. We are committed to take appropriate actions for prevention and redressal of unlawful discrimination and harassment at the workplace.

The Policy for Prevention of Sexual Harassment was re-Considered by the Board of Directors at the meeting held on 05.02.2025 in compliance with the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013.

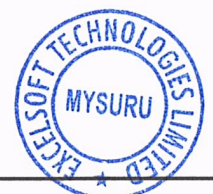
2. SCOPE:

This policy provides protection against sexual harassment of women at workplace and the prevention and redressal of complaints of sexual harassment and matters related to it.

This policy applies to all categories of employees of the Company, including permanent management and workmen, temporaries, trainees and employees on contract at their workplace or at client sites and any person responsible for the management, supervision and control of the workplace. The Company will not tolerate sexual harassment, if engaged in by the employees, clients or by suppliers or any other business associates.

The workplace includes:

- a) All offices or other premises where the Company’s business is conducted.
- b) All company-related activities performed at any other site away from the Company’s premises.
- c) Any social, business or other functions where the conduct or comments may have an adverse impact on the workplace or workplace relations.



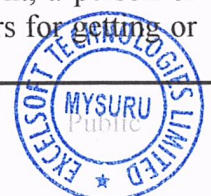
3. DEFINITION:

(A) “Sexual harassment” would mean and include any of the following:

- i. Submission to such advances, requests or conduct is made either an implicit or explicit term or condition of employment.
- ii. Submission to or rejection of such advances, requests or conduct is the basis for any employment decision; and or
- iii. Such advances, requests or conduct have the purpose or effect of unreasonably interfering with the individual’s performance by creating an intimidating, hostile or sexually offensive work environment.
Sexual harassment is not limited to explicit demands for sexual favors. This policy forbids harassment based on gender regardless of whether the offensive conduct is sexual in nature, or whether the conduct is directed toward a person of the opposite or same gender. While it is not possible to list all actions that may constitute sexual harassment, the following are examples of conduct which, if unwelcome, may constitute sexual harassment depending upon the totality of the circumstances including the severity of the conduct and its pervasiveness
- iv. Sexually oriented written or oral epithets, teasing, jokes, or references to sexual conduct, gossip regarding one’s sex life, comment on an individual’s body, inquiries into one’s sexual experiences, comment about an individual’s sexual activities, deficiencies, or prowess.
- v. Unwelcome sexual flirtations, advances or propositions, whether or not they involve physical touching.
- vi. Continued or repeated verbal abuse of a sexual nature.
- vii. Graphic or degrading comments about an individual or his or her appearance or sexual activity.
- viii. Unwelcome visual conduct, including sexual gestures, suggestive comments, and the display of sexually suggestive objects, pictures, cartoons, or posters.
- ix. Suggestive or obscene letters, e-mails, notes or invitations.
 - x. Offensive physical contact such as patting, grabbing, pinching, kissing, hugging, groping, fondling, or brushing against another’s body.
- xi. Use of the Company’s business communications systems, including telephones, voicemail, computer and
- xii. mail systems for sexual harassment.
- xiii. Continuing to ask an employee to socialize on or off duty when that person has indicated that she or he is not interested; or
- xiv. Creating a work environment that is intimidating, hostile or offensive because of sexually oriented conversations, suggestions, requests, demands, physical contacts or attentions

Sexual harassment is unlawful whether it involves harassment by a co-worker, a supervisor or manager, or by persons doing business with the Company. Sexual harassment is an insidious practice which demeans individuals being treated in such a manner. It not only creates unacceptable stress for the entire organization, but morale and work effectiveness are adversely affected. Employees are expected to maintain a professional atmosphere in the workplace at all times.

- (a) Under the quid pro quo (meaning this for that) form of harassment, a person or authority, usually the superior of the victim, demands sexual favors for getting or



keeping a job benefit and threatens to fire the employee if the conditions are not met.

- (b) A hostile work environment arises when a co-worker or supervisor creates a work environment through verbal or physical conduct that interferes with another co-worker's job performance or creates the workplace atmosphere which is intimidating, hostile, offensive or humiliating and experienced as an attack on personal dignity. For example, an employee tells offensive jokes. No person shall indulge or caused to be indulged under instructions from superior in sexual harassment of co-workers.

However, an employee who is sexually harassed can complain about the same even if there is no adverse job consequence.

- (B) "Employee" means any person on the rolls of the Company including those on deputation, contract, temporary, part time or working as consultants.

4. RESPONSIBILITIES REGARDING SEXUAL HARASSMENT

All employees of the Company have a personal responsibility to ensure that their behavior is not contrary to this policy. All employees are encouraged to reinforce the maintenance of a work environment free from sexual harassment.

5. CONSTITUTION OF INTERNAL COMPLAINT COMMITTEE

The Company has instituted an "Internal Complaint Committee" for redressal of sexual harassment complaint (made by the victim or by anyone on behalf of the victim) and for ensuring time bound treatment of such complaints. The Complaints Committee will comprise of the following composition, till further notice:

Member Name	Designation	E-mail Id
Ms. Manjula Mukund	Presiding Officer	manjula@excelsoftcorp.com
Ms. Suvarna S	ICC Member	suvarna@excelsoftcorp.com
Mr. Shivakumar S	ICC Member	shiv@excelsoftcorp.com
Mr. Prashanth H M	ICC Member	prashanth@excelsoftcorp.com
Mr. Tejaswi V K	ICC Member	tejaswi@excelsoftcorp.com
Mr. Venkatesh D	ICC Member	venkatesh.d@excelsoftcorp.com
Mr. Balaji Dasari	ICC Member	balaji.dasari@excelsoftcorp.com
Ms. Sandhya Dwivedi	ICC Member	sandhya.dwivedi@excelsoftcorp.com
Ms. Nithyashree H M	ICC Member	nithyashree.hm@excelindia.com
Ms. Deepa Madas	ICC Member	deepa.madas@excelindia.com
Ms. Junia Sebastian	External ICC Member	jsebastian@almtlegal.com



The Complaints Committee is responsible for:

- Investigating every formal written complaint of sexual harassment
- Taking appropriate remedial measures to respond to any substantiated allegations of sexual harassment
- Discouraging and preventing employment-related sexual harassment.
- To organize regular workshop and training programs, based on organizational requirement.
- To formulate programs for the spread of awareness of the policy among the management.
- It is to be noted that the Internal Complaint Committee will not entertain any anonymous complaints.

The Committee shall prepare an annual report in each calendar year stating the number of complaints received during the year, number of complaints disposed off during the year and such other information as required and submit it to the employers.

6. PROCEDURE FOR INFORMAL GRIEVANCE REDRESSAL

Informal processes normally involve an intermediary means for resolving a problem. In the case of Sexual Harassment, at first instance, the person (i.e. HOD/ HR / Woman representative of the location) may be the point of first contact for anyone seeking informal support/intervention to stop unwelcome behavior.

A sense of restraint and responsibility on the part of all concerned is critical for the effective functioning of these guidelines. The preventive / informal process that can be adopted is as follows:

- a) Convey to the person who is the cause of distress, about what that person's actions, words, behavior is doing and convey in no uncertain terms that such behavior is not appreciated. What is important is the "Way" a particular behavior, action or word is perceived; "Intent" is of no consequence.
- b) The second step would be to approach someone within the company – preferably your Superior or HR Representative. The Superior or HR Representative would then try and counsel / talk it over with a view towards closing the matter amicably.
- c) In any case all such incidents along with the resolution needs to be reported to the Head of HR who will then provide a short report to the Internal Complaints Committee and the matter will be closed.
- d) However, in the event of it not being resolved, then it would need to be escalated to the Internal Complaints Committee.



7. PROCEDURES FOR RESOLUTION, SETTLEMENT OR PROSECUTION OF ACTS OF SEXUAL HARASSMENT

In the event of the complaint not being resolved through an informal mechanism, then it would need to be escalated to the Internal Complaint Committee for redressal. If you have experienced or witnessed any conduct that may be inconsistent with this policy, you should report the incident to the Sexual Harassment & Prohibition of Other forms of Discrimination Committee at redressal@excelindia.com. The Company is committed to providing a supportive environment to resolve concerns of sexual harassment as under:

- a. An employee with a harassment concern may make a formal complaint to the Presiding Officer of the Complaints Committee constituted by the Management. The complaint shall have to be in writing and can be in the form of a letter, preferably within 15 days from the date of the occurrence of the alleged incident, sent in a sealed envelope. Alternatively, the employee can send complaints through an email. The employee is required to disclose their name, department, division and location they are working in, to enable the Presiding Officer to contact them and take the matter forward.
- b. The Presiding Officer of the Complaints Committee will proceed to determine whether the allegations (assuming them to be true only for the purpose of this determination) made in the complaint fall under the purview of Sexual Harassment, preferably within 30 days from receipt of the complaint.
- c. In the event, the allegation does not fall under the purview of Sexual Harassment, or the allegation does not constitute an offence of Sexual Harassment, the Presiding Officer will record this finding with reasons and communicate the same to the complainant.
- d. If the Presiding Officer of the Complaints Committee determines that the allegations constitute an act of sexual harassment, he/ she will proceed to investigate the allegation with the assistance of the Complaints Committee.
- e. Where such conduct, on the part of the accused, amounts to a specific offence under the law, the Company shall initiate appropriate action in accordance with law by making a complaint with the appropriate authority.
- f. The Complaints Committee shall conduct such investigations in a timely manner and shall submit a written report containing the findings and recommendations to the Executive Director & Head of HR Department as soon as practically possible and in any case, not later than 90 days from the date of receipt of the complaint. The Executive Director & Head of HR Department will ensure corrective action on the recommendations of the Complaints Committee and keep the complainant informed of the same.

Corrective action may include any of the following:

- i. Formal apology.
- ii. Counseling.
- iii. Written warning to the perpetrator and a copy of it maintained in the employee's file.



- iv. Change of work assignment / transfer for either the perpetrator or the victim;
- v. Withholding promotion.
- vi. Suspension or termination of services of the employee found guilty of the offence.

- vii. In case the complaint is found to be false, the Complainant shall, if deemed fit, be liable for appropriate disciplinary action by the Management.

8. 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.

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.

9. PROTECTION TO COMPLAINANT / VICTIM

The Company is committed to ensuring that no employee who brings forward a harassment concern is subject to any form of reprisal. Any reprisal will be subject to disciplinary action.

The Company will ensure that the victim or witnesses are not victimized or discriminated against while dealing with complaints of sexual harassment.

However, anyone who abuses the procedure (for example, by maliciously putting an allegation knowing it to be untrue) will be subject to disciplinary action.

10. CONCLUSION

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



Format for Annual report of Complaint Redressal Committee:
[As required under sec.21 of Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013]

Sl. No.	No. Of Complaints received	No. of Cases Adjudicated			Actions taken on the Complaint	No. of Cases pending for more than 90 days
		Through Counseling	Otherwise			
			Guilty	Not Guilty		

