

Solon India Private Limited



Anti-Sexual Harassment Policy

October 2023



A handwritten signature in blue ink, likely belonging to a company representative, is placed here.

Table of Contents

| | |
|--|---|
| 1. Introduction | 3 |
| 1.1 Purpose of the Policy..... | 3 |
| 1.2 Scope of the Policy | 4 |
| 1.3 Commitment to a Harassment-Free Workplace..... | 4 |
| 1.4 Definitions and Key Terms | 4 |
| 2. Policy Statement..... | 4 |
| 2.1 Zero Tolerance for Sexual Harassment | 4 |
| 2.2 Responsibility of the Company..... | 4 |
| 2.3 Responsibility of Employees..... | 5 |
| 2.4 Reporting Mechanisms..... | 5 |
| 2.5 Protection from Retaliation..... | 5 |
| 3. Forms of Sexual Harassment | 5 |
| 3.1 Quid Pro Quo Harassment..... | 5 |
| 3.2 Hostile Work Environment Harassment | 5 |
| 3.3 Examples of Sexual Harassment..... | 6 |
| 4. Reporting and Complaint Procedures..... | 6 |
| 4.1 Reporting Sexual Harassment | 6 |
| 4.2 Confidentiality | 6 |
| 4.3 Initial Contact Person | 6 |
| 4.4 Investigation Process | 7 |
| 4.5 Remedial Measures..... | 7 |
| 4.6 Timeframe for Resolution..... | 7 |
| 4.7 False or Malicious Complaints..... | 7 |
| 5. Support and Resources..... | 7 |
| 5.1 Employee Assistance Program (EAP)..... | 7 |
| 5.2 Legal Rights and Options | 8 |
| 5.3 Counselling and Support | 8 |
| 6. Preventive Measures | 8 |
| 6.1 Awareness and Training | 8 |
| 6.2 Creating a Respectful Workplace Culture..... | 8 |
| 6.3 Supervisory Responsibility | 9 |
| 6.4 Reporting Obligations for Managers | 9 |
| 6.5 Disciplinary Actions | 9 |

| | |
|--|----|
| 7. Education and Training | 9 |
| 7.1 Regular Training Programs..... | 9 |
| 7.2 Content of Training..... | 10 |
| 7.3 Frequency of Training..... | 10 |
| 8. Compliance and Monitoring..... | 10 |
| 8.1 Policy Review and Updates | 10 |
| 8.2 Compliance Audits | 10 |
| 8.3 Monitoring and Reporting Metrics..... | 11 |
| 9. Consequences of Violation..... | 11 |
| 9.1 Disciplinary Actions | 11 |
| 9.2 Legal Consequences | 11 |
| 10. Acknowledgment and Acknowledgment Form | 11 |
| 10.1 Employee Acknowledgment of Policy | 11 |
| 10.2 Contractor and Vendor Acknowledgment..... | 12 |
| 11. Communication and Awareness | 12 |
| 11.1 Policy Dissemination | 12 |
| 11.2 Awareness Campaigns..... | 12 |
| 12. Conclusion..... | 12 |
| Appendix A: Relevant Laws and Regulations..... | 14 |
| Appendix B: Contact Information for Reporting..... | 15 |
| Appendix C: Sample Complaint Form | 17 |
| Appendix D: Sample Investigation Checklist | 19 |
| Appendix E: Approval and Implementation | 22 |
| Appendix F: Employee Acknowledgment of Anti-Sexual Harassment Policy..... | 24 |

1. Introduction

1.1 Purpose of the Policy

The purpose of this policy is to create a safe and inclusive work environment for all employees, contractors, vendors, and visitors associated with Solon India Private Limited (SIPL). We are committed to preventing and addressing sexual harassment in all its forms within our organization. This policy serves as a clear statement of our commitment to maintaining a harassment-free workplace and outlines the procedures for reporting, investigating, and remedying any incidents of sexual harassment. It aims to foster a culture of respect, dignity, and equality among all members of our workforce.

1.2 Scope of the Policy

This policy applies to all individuals who are part of SIPL, including but not limited to employees, contractors, subcontractors, interns, visitors, and volunteers. It extends to all company premises, job sites, off-site locations, company-sponsored events, and virtual workspaces. We are committed to addressing sexual harassment both within and outside the workplace when it involves individuals associated with our company. This policy reinforces our dedication to eliminating sexual harassment at every level and in all aspects of our operations, ensuring a comprehensive approach to prevention and resolution.

1.3 Commitment to a Harassment-Free Workplace

SIPL is unwavering in its commitment to providing a workplace free from all forms of sexual harassment. We firmly believe that every employee has the right to work in an environment where they are treated with respect, dignity, and fairness. We actively discourage any behaviour that contributes to a hostile, intimidating, or offensive atmosphere. By fostering a culture that values diversity and inclusion, we aim to ensure that all employees feel safe and comfortable reporting any instances of sexual harassment without fear of retaliation.

1.4 Definitions and Key Terms

To ensure clarity and understanding, this policy provides definitions and explanations of key terms related to sexual harassment. These definitions help all individuals associated with SIPL recognize and differentiate between acceptable and unacceptable behaviour. It is essential that everyone has a common understanding of terms like "sexual harassment," "quid pro quo harassment," "hostile work environment," and other relevant concepts. These definitions serve as the foundation upon which we build our efforts to prevent, address, and ultimately eliminate sexual harassment from our workplace.

2. Policy Statement

2.1 Zero Tolerance for Sexual Harassment

Solon India Private Limited (SIPL) maintains a strict zero-tolerance policy when it comes to sexual harassment. We unequivocally condemn all forms of sexual harassment, including but not limited to unwelcome advances, requests for sexual favours, offensive comments, and any other behaviour that creates a hostile or intimidating environment. Regardless of the position or relationship within the company, sexual harassment will not be tolerated. This commitment underscores our dedication to ensuring that every employee, contractor, and visitor can work in an environment free from fear, discrimination, and harassment.

2.2 Responsibility of the Company

SIPL takes a proactive role in preventing and addressing sexual harassment. We are committed to providing clear guidelines, resources, and support systems to foster a harassment-free workplace. The company will appoint designated individuals or committees responsible for the implementation, oversight, and enforcement of this policy. We will also allocate necessary resources for training, awareness campaigns, and investigations. Additionally, the company pledges to investigate all reported incidents of sexual harassment, take appropriate remedial action, and ensure a fair and impartial process promptly and thoroughly.

2.3 Responsibility of Employees

Every individual associated with SIPL plays a crucial role in maintaining a harassment-free workplace. All employees are expected to treat their colleagues, contractors, and visitors with respect, dignity, and professionalism. This includes refraining from engaging in any form of sexual harassment and promptly reporting any incidents they witness or experience. We encourage open communication and cooperation among employees to ensure that our workplace remains inclusive and safe for all. Failure to adhere to this policy and fulfil one's responsibility to prevent and report sexual harassment may result in disciplinary actions.

2.4 Reporting Mechanisms

To facilitate the reporting of sexual harassment, SIPL provides multiple channels through which individuals can make complaints. Employees can report incidents to their immediate supervisors, human resources department, designated contact persons, or through anonymous reporting mechanisms if preferred. We emphasize that individuals should use the reporting method with which they are most comfortable. The company is committed to treating all reports confidentially to the extent allowed by law, and investigations will be conducted promptly and impartially.

2.5 Protection from Retaliation

SIPL understands the courage it takes to report incidents of sexual harassment. We are committed to protecting individuals who come forward as witnesses or victims from any form of retaliation. Retaliation against individuals who report sexual harassment or cooperate in investigations is strictly prohibited and will be treated as a violation of company policy, subject to disciplinary action. We encourage individuals to report any instances of retaliation promptly, and the company will take appropriate steps to address such behaviour and ensure the safety of the reporting parties. Our commitment to protecting whistleblowers is an essential part of creating a safe and respectful workplace culture.

3. Forms of Sexual Harassment

3.1 Quid Pro Quo Harassment

Quid pro quo harassment is a form of sexual harassment in which a person, often in a position of authority, attempts to gain sexual favours or engage in unwelcome sexual conduct with another person as a condition of their employment, job advancement, or other work-related opportunities. At Solon India Private Limited (SIPL), we unequivocally prohibit quid pro quo harassment. This means that no supervisor, manager, or any other employee is allowed to make employment decisions, such as promotions, raises, or work assignments, contingent upon sexual acts or the acceptance of inappropriate advances. We take this form of harassment seriously, and any reported instances will be promptly investigated and addressed with appropriate disciplinary action.

3.2 Hostile Work Environment Harassment

Hostile work environment harassment occurs when an employee is subjected to unwelcome and offensive sexual advances, comments, or behaviour that creates a hostile, intimidating, or abusive work environment. At SIPL, we are committed to ensuring that every employee can work in an environment that is free from such behaviour. Hostile work environment

harassment can manifest through explicit sexual comments, lewd jokes, offensive materials, or any behaviour that creates a pervasive atmosphere of discomfort. Regardless of the source or intensity of the harassment, we take it seriously, and all reported incidents will be thoroughly investigated, and appropriate action will be taken to eliminate the hostile environment.

3.3 Examples of Sexual Harassment

While the forms of sexual harassment can vary, it's important to provide examples to help employees understand what constitutes inappropriate behaviour. Examples of sexual harassment may include unwelcome sexual advances, requests for sexual favours, unwanted touching or physical contact, sexual jokes or comments, displaying explicit materials, cyberbullying or online harassment with sexual content, and making derogatory or offensive remarks based on an individual's gender or sexuality. These are just a few examples, and sexual harassment can take many forms. Our company is dedicated to educating employees about these examples and ensuring they understand what constitutes unacceptable behaviour, fostering a workplace culture where everyone feels respected and safe. Reporting such incidents is crucial to maintaining a harassment-free workplace, and our reporting mechanisms are designed to make this process as accessible and confidential as possible.

4. Reporting and Complaint Procedures

4.1 Reporting Sexual Harassment

Solon India Private Limited (SIPL) is committed to providing clear and accessible procedures for reporting incidents of sexual harassment. Employees, contractors, and other individuals associated with SIPL are encouraged to report any incidents promptly. Reporting can be done through various channels, including speaking to a supervisor, manager, or designated contact person, or using anonymous reporting mechanisms if preferred. We understand that coming forward can be difficult, and we assure all individuals that their complaints will be treated seriously, confidentially, and without fear of retaliation.

4.2 Confidentiality

Confidentiality is a fundamental aspect of our reporting and investigation procedures. We understand the sensitive nature of sexual harassment complaints, and we are committed to maintaining the privacy of all parties involved to the fullest extent allowed by law. While we strive to protect the confidentiality of individuals, we also acknowledge that a thorough investigation may require limited disclosure to appropriate parties. However, all efforts will be made to minimize the spread of information to those not directly involved in the investigation. We strongly discourage gossip or sharing of information related to complaints and investigations to protect the integrity of the process.

4.3 Initial Contact Person

To ensure that individuals have a trusted and accessible point of contact when reporting sexual harassment, our company designates an initial contact person within the organization. This individual is responsible for receiving complaints, providing information about the reporting process, and ensuring that the complaint is appropriately documented and forwarded to the appropriate authorities for investigation. The initial contact person serves as a valuable

resource for those who wish to report an incident and helps facilitate a prompt and thorough resolution.

4.4 Investigation Process

When a complaint of sexual harassment is received, our company will initiate a thorough and impartial investigation. The investigation process will include interviews with the parties involved, gathering of relevant evidence, and consulting with witnesses, if applicable. We will ensure that the investigator is trained in handling sensitive matters and is impartial throughout the process. The goal of the investigation is to determine the facts, assess the credibility of the parties involved, and reach a fair and just resolution. All individuals involved in the investigation will be treated with respect and dignity.

4.5 Remedial Measures

Upon the completion of an investigation, our company will take appropriate remedial action to address the situation and prevent further harassment. Remedial measures may include disciplinary actions, such as warnings, suspension, or termination, as well as counselling or training for the individuals involved. Additionally, we may implement broader measures, such as revising policies, conducting additional training, or making changes to the work environment to prevent similar incidents in the future. The specific actions taken will depend on the findings of the investigation and will be aimed at ensuring a harassment-free workplace.

4.6 Timeframe for Resolution

SIPL is committed to resolving sexual harassment complaints promptly and efficiently. While the exact timeframe for resolution may vary depending on the complexity of the case, we will make every effort to ensure that investigations are conducted in a timely manner. We recognize the importance of addressing complaints promptly to minimize the impact on those involved and to maintain a respectful workplace environment. We will communicate with the parties involved throughout the process to provide updates on the progress of the investigation and the expected timeframe for resolution.

4.7 False or Malicious Complaints

While we are dedicated to taking all reports of sexual harassment seriously, we also acknowledge the importance of preventing false or malicious complaints that can harm the reputation and well-being of individuals. Individuals who knowingly make false or malicious complaints with the intent to harm another party will be subject to appropriate disciplinary actions in accordance with company policies. It is essential that individuals exercise honesty and integrity when reporting incidents of sexual harassment, as our commitment is to a fair and just resolution for all parties involved.

5. Support and Resources

5.1 Employee Assistance Program (EAP)

Solon India Private Limited (SIPL) recognizes the emotional and psychological toll that incidents of sexual harassment can have on individuals. To provide comprehensive support, we offer an Employee Assistance Program (EAP). This confidential resource is available to all

employees, contractors, and their immediate family members. The EAP offers professional counselling services to help individuals cope with the emotional impact of harassment and other personal issues that may arise as a result. Whether you need someone to talk to, assistance in finding local support services, or guidance on legal matters related to harassment, our EAP is here to provide the support you need in a caring and confidential manner.

5.2 Legal Rights and Options

SIPL is dedicated to ensuring that all individuals understand their legal rights and options when it comes to addressing sexual harassment. We provide information about relevant laws and regulations related to harassment, as well as an overview of individuals' legal rights in such situations. This includes information about filing complaints with government agencies, pursuing legal action, and seeking remedies for damages. We encourage individuals to consult with legal counsel if they believe their legal rights have been violated and to reach out to appropriate authorities if they choose to pursue legal action. Our commitment is to support individuals in asserting their rights and seeking justice.

5.3 Counselling and Support

We understand that coping with the aftermath of sexual harassment can be a challenging and emotional experience. To assist individuals in their healing process, we offer access to counselling and support services. This may include referrals to qualified counsellors or therapists who specialize in trauma and harassment-related issues. Additionally, we encourage individuals to seek support from friends, family members, or support groups as they navigate their experiences. SIPL is dedicated to fostering a supportive and empathetic environment where individuals can access the resources and assistance they need to heal and move forward.

6. Preventive Measures

6.1 Awareness and Training

One of the cornerstones of preventing sexual harassment within Solon India Private Limited (SIPL) is raising awareness and providing comprehensive training. We are committed to ensuring that all employees and associates receive regular training on the various aspects of sexual harassment, its forms, and the importance of creating a respectful and inclusive workplace. Our training programs are designed to help individuals recognize the signs of harassment, understand appropriate workplace behaviour, and know how to respond when they encounter or witness such behaviour. By fostering awareness and providing ongoing education, we empower our workforce to actively contribute to a harassment-free workplace culture.

6.2 Creating a Respectful Workplace Culture

SIPL is dedicated to cultivating a workplace culture that values respect, inclusivity, and diversity. We believe that by fostering an environment where every individual is treated with dignity and fairness, we can prevent incidents of sexual harassment from occurring in the first place. To achieve this, we promote open communication, encourage employees to speak up when they encounter inappropriate behaviour, and celebrate diversity as one of our core

strengths. We also emphasize the importance of teamwork, collaboration, and mutual respect in all aspects of our operations. By creating a culture of respect, we aim to eliminate the conditions that allow sexual harassment to thrive.

6.3 Supervisory Responsibility

Supervisors and managers play a pivotal role in preventing sexual harassment within SIPL. We expect our supervisors to lead by example and actively promote a respectful and harassment-free workplace culture. This includes promptly addressing any reported incidents, providing support to employees who come forward, and taking appropriate action to prevent further harassment. Supervisors are also responsible for ensuring that their teams are well-informed about the anti-sexual harassment policy and procedures. They must be vigilant in identifying signs of potential harassment and creating an environment where employees feel comfortable reporting concerns without fear of retaliation. SIPL is committed to holding supervisors accountable for their role in maintaining a harassment-free workplace.

6.4 Reporting Obligations for Managers

In addition to their supervisory responsibilities, managers within SIPL have specific reporting obligations when they become aware of incidents of sexual harassment. Managers must report any complaints or observations of sexual harassment to the appropriate company authorities, such as the HR department or designated contact person. This reporting obligation ensures that all incidents are thoroughly investigated and addressed, and that no instances of harassment go unaddressed. By holding managers accountable for reporting, we strengthen our commitment to a safe and respectful work environment.

6.5 Disciplinary Actions

SIPL enforces strict disciplinary actions for individuals who engage in sexual harassment. We believe that by holding individuals accountable for their actions, we deter such behaviour and reinforce our commitment to a harassment-free workplace. Disciplinary actions may include verbal or written warnings, suspension, termination, or other appropriate measures, depending on the severity of the offense and the findings of the investigation. We are dedicated to ensuring that our disciplinary actions are fair, consistent, and proportionate to the misconduct. By imposing consequences for harassment, we send a clear message that such behaviour will not be tolerated within our organization, contributing to the prevention of future incidents.

7. Education and Training

7.1 Regular Training Programs

To ensure that all individuals associated with Solon India Private Limited (SIPL) are well-informed about our anti-sexual harassment policy and equipped with the knowledge to prevent, recognize, and respond to sexual harassment, we conduct regular training programs. These programs are a cornerstone of our commitment to maintaining a harassment-free workplace. Training sessions are mandatory for all employees, and they include comprehensive content on the various aspects of sexual harassment. By conducting regular training, we not only educate our workforce but also reinforce our dedication to creating a safe and respectful work environment.

7.2 Content of Training

SIPL's training programs are designed to cover a wide range of topics related to sexual harassment prevention and response. Participants will learn about the different forms of sexual harassment, including quid pro quo harassment and hostile work environment harassment. They will also understand our company's policy and reporting procedures, emphasizing the importance of prompt reporting. The training content includes guidance on appropriate workplace behaviour, respectful communication, and recognizing and addressing potential signs of harassment. Real-life scenarios and case studies are used to illustrate key concepts, ensuring that participants gain practical knowledge that they can apply in their daily work. By providing comprehensive training content, we empower our employees to be proactive in preventing sexual harassment.

7.3 Frequency of Training

To ensure that our employees and associates remain informed and up to date on matters related to sexual harassment, we conduct training sessions regularly. New employees will receive training during their orientation, and all employees will participate in refresher training sessions periodically. The frequency of training may be determined by factors such as changes in laws or company policies, emerging best practices, or the need to address specific issues. Our commitment is to provide ongoing education to maintain a workplace culture that actively promotes respect and discourages harassment. We also make accommodations to ensure that remote or off-site employees have access to training to maintain consistency throughout the organization.

8. Compliance and Monitoring

8.1 Policy Review and Updates

Solon India Private Limited (SIPL) is committed to the ongoing review and improvement of our anti-sexual harassment policy. We understand that the landscape of workplace dynamics and legal requirements may change over time, and it is our responsibility to adapt to these changes. As such, we regularly review and update our policy to ensure that it remains effective and aligned with the latest legal standards and best practices. This review process involves seeking input from relevant stakeholders, including employees, legal advisors, and external experts, to ensure that our policy is comprehensive and responsive to emerging issues. Our commitment to policy review and updates underscores our dedication to maintaining a harassment-free workplace.

8.2 Compliance Audits

To ensure the continued effectiveness of our anti-sexual harassment efforts, SIPL conducts compliance audits. These audits are designed to assess the implementation and adherence to our anti-sexual harassment policy and related procedures. We may engage internal auditors with expertise in this area to conduct impartial assessments. Compliance audits may include a review of training records, investigation procedures, reporting mechanisms, and other aspects of our policy. The findings of these audits help us identify areas of improvement, rectify deficiencies, and enhance our efforts to prevent sexual harassment. We are committed to taking prompt action to address any issues that may arise during the Internal audits.

8.3 Monitoring and Reporting Metrics

To gauge the effectiveness of our anti-sexual harassment initiatives, we closely monitor and analyse relevant metrics and data. This includes tracking the number of reported incidents, the time taken for resolution, trends in complaints, and feedback from employees. By examining these metrics, we can identify patterns or areas of concern and take proactive measures to address them. Additionally, we regularly report on these metrics to our leadership team and board of directors to ensure transparency and accountability in our efforts. Monitoring and reporting metrics help us make data-driven decisions to continuously improve our policies, training programs, and prevention strategies, ultimately working towards our goal of a harassment-free workplace for all individuals associated with our company.

9. Consequences of Violation

9.1 Disciplinary Actions

Solon India Private Limited (SIPL) takes any violation of our anti-sexual harassment policy extremely seriously. We are committed to ensuring a safe and respectful workplace for all, and this commitment extends to imposing appropriate disciplinary actions when violations occur. Depending on the severity of the violation and the findings of any investigations, disciplinary actions may include verbal or written warnings, suspension, termination, or other measures deemed necessary by our company. We conduct disciplinary proceedings fairly and impartially, providing individuals involved an opportunity to respond and present their case. The specific disciplinary action will be determined on a case-by-case basis, taking into consideration the nature and gravity of the misconduct. Our goal is to create a workplace where individuals feel protected from harassment, and where those who engage in such behaviour are held accountable for their actions.

9.2 Legal Consequences

In addition to the internal disciplinary actions, individuals who engage in sexual harassment may face legal consequences as well. SIPL is committed to cooperating fully with any legal authorities or government agencies investigating instances of sexual harassment. Legal consequences can include civil lawsuits filed by victims seeking damages, fines imposed by regulatory bodies, or even criminal charges in cases of severe harassment. We strongly advise all individuals associated with our company to be aware of the potential legal ramifications of their actions and to comply fully with our anti-sexual harassment policy. Our commitment to a harassment-free workplace extends to ensuring that individuals who experience harassment have the opportunity to pursue legal remedies if they choose to do so. We will not tolerate any attempts to evade accountability for sexual harassment, and we are resolute in our support of victims' legal rights and options.

10. Acknowledgment and Acknowledgment Form

10.1 Employee Acknowledgment of Policy

To reinforce the importance of our anti-sexual harassment policy and ensure that all employees are aware of its contents, we require each employee to acknowledge receipt and

understanding of the policy. This acknowledgment serves as evidence that the employee has been informed about the policy and is committed to upholding its principles. Employees are asked to carefully review the policy and sign an acknowledgment form, confirming that they have read, understood, and agreed to comply with its provisions. This process not only promotes awareness but also emphasizes the shared responsibility of all employees in creating a harassment-free workplace. We consider this acknowledgment a vital step in our efforts to foster a culture of respect and accountability.

10.2 Contractor and Vendor Acknowledgment

Our commitment to preventing sexual harassment extends beyond our employees to include contractors, vendors, and other third-party entities that engage with SIPL. Contractors and vendors are expected to adhere to our policy while on our premises or when engaged in activities related to our company. We emphasize our dedication to maintaining a respectful workplace for everyone associated with our organization, regardless of their employment status, and we hold external parties accountable for upholding our standards and values.

11. Communication and Awareness

11.1 Policy Dissemination

Effective communication of our anti-sexual harassment policy is essential to ensure that all individuals associated with Solon India Private Limited (SIPL) are aware of their rights and responsibilities. Upon joining the company, employees and contractors are briefed on this policy as part of their orientation process. We encourage open dialogue and discussions about the policy during team meetings and training sessions. By employing various communication channels, we ensure that our anti-sexual harassment policy remains visible, accessible, and well-understood by all members of our organization.

11.2 Awareness Campaigns

In addition to the regular dissemination of our anti-sexual harassment policy, we conduct awareness campaigns to reinforce our commitment to creating a harassment-free workplace. These campaigns are designed to educate employees and associates about the importance of maintaining a respectful and inclusive environment. Awareness campaigns may include events, workshops, seminars, or webinars that delve deeper into the topics of respect, diversity, and the prevention of sexual harassment. We also encourage employees to actively participate in awareness initiatives and share their experiences and insights to promote a culture of open communication and mutual support. By fostering awareness through these campaigns, we aim to empower individuals to recognize and respond to inappropriate behaviour, ultimately contributing to a workplace culture where sexual harassment is not tolerated, and everyone feels safe and valued.

12. Conclusion

In conclusion, our commitment to maintaining a safe, respectful, and harassment-free workplace is unwavering. This anti-sexual harassment policy underscores our dedication to ensuring that every individual associated with Solon India Private Limited (SIPL) is treated with dignity and respect. We firmly believe that a workplace free from sexual harassment is

essential for fostering a culture of collaboration, innovation, and mutual support. By adhering to the principles and procedures outlined in this policy, we aim to create an environment where all employees, contractors, and associates can thrive without fear of harassment. Together, we can uphold these standards and work towards a future where every workplace is characterized by fairness, inclusivity, and equality.



Appendix A: Relevant Laws and Regulations

This appendix provides a summary of the primary federal laws and regulations related to sexual harassment in the workplace. While this overview is not exhaustive, it serves as a reference point for individuals associated with Solon India Private Limited (SIPL), helping them understand the legal context within which our anti-sexual harassment policy operates.

Sexual Harassment of Women at Workplace (Prevention, Prohibition, and Redressal) Act, 2013: This is the primary legislation that mandates employers to create a safe and harassment-free workplace environment for women. It outlines the duties of employers, the process for filing complaints, and the establishment of Internal Complaints Committees (ICCs) in organizations.

The Vishakha Guidelines (1997): These guidelines were laid down by the Supreme Court of India before the enactment of the PoSH Act. They provided a framework for addressing sexual harassment at workplaces and served as a basis for the subsequent legislation.

Indian Penal Code (IPC): Various sections of the IPC deal with specific criminal offenses related to sexual harassment, including Sections 354A (sexual harassment), 354D (stalking), 509 (insulting modesty of a woman), and others. These sections provide for criminal penalties in cases of sexual harassment outside of the workplace.

Workplace Policies: Many companies in India have their own internal policies and procedures for addressing sexual harassment, which are often aligned with the PoSH Act. These policies are designed to complement the legal framework and provide guidance for employees and employers.

State and Local Laws: In addition to federal laws, many states and local jurisdictions have their own laws and regulations governing sexual harassment. These laws may extend protections to a broader range of employees or impose additional requirements on employers. It's important to be aware of the specific laws that apply to your location.

State Human Rights Commissions: Some states have their own human rights commissions or agencies responsible for enforcing state anti-discrimination laws. These agencies may provide additional avenues for reporting and addressing sexual harassment.

It is essential to familiarize yourself with these laws and regulations to understand your rights and protections regarding sexual harassment in the workplace. If you have questions or believe your rights have been violated, please refer to our policy's reporting mechanisms or seek legal counsel for further guidance.

Appendix B: Contact Information for Reporting

This appendix provides contact information for designated individuals and departments responsible for receiving and addressing reports of sexual harassment within Solon India Private Limited (SIPL). Reporting an incident of sexual harassment is a crucial step in our commitment to maintaining a respectful and harassment-free workplace. We encourage all employees, contractors, and individuals associated with our organization to use these contact details to report any concerns promptly.

1. Human Resources Department:

HR Manager: _____ Phone: _____
Email: _____ Address: _____

2. Designated Contact Person (if applicable):

Contact Person Name: _____ Phone: _____
Email: _____ Address: _____

3. Anonymous Reporting Hotline (if applicable):

Hotline Phone Number: _____
Online Reporting: _____

4. Your Supervisor or Manager:

Supervisor's/Manager's Name: _____
Email: _____ Phone: _____

5. Ombudsman or Ethics Officer (if applicable):

Ombudsman/Ethics Officer's Name: _____
Email: _____ Phone: _____

6. Legal Counsel (for legal consultation):

Legal Counsel's Name: _____

Email:

Phone:

It is essential to report any incidents or concerns related to sexual harassment promptly and through the appropriate channels. All reports will be treated confidentially to the extent allowed by law, and Solon India Private Limited (SIPL) is committed to conducting thorough and impartial investigations. We encourage open communication and are here to provide the support and assistance needed to address any such issues effectively.

Appendix C: Sample Complaint Form

Instructions:

Please complete this form if you wish to report an incident of sexual harassment that you have experienced, witnessed, or have knowledge of. This form is designed to assist in the accurate documentation of the incident and will be used to initiate an investigation. Your privacy and confidentiality will be respected throughout the process. You may submit this form electronically or in hard copy to the designated reporting contact(s) mentioned in our anti-sexual harassment policy.

Date of Complaint:

Complainant Information:

Full Name:

Employee ID (if applicable):

Job Title/Position:

Department/Unit:

Contact Information:

- Email Address: [Your Email Address]
- Phone Number: [Your Phone Number]

Nature of the Complaint:

- Describe the incident(s) of sexual harassment, including the date(s), time(s), and location(s) of occurrence.
- Identify the individual(s) involved in the incident(s), including the alleged harasser(s) and any witnesses, if applicable.

Description of the Incident:

Provide a detailed description of the incident(s), including any offensive comments, actions, or behaviours that occurred. Be as specific as possible.

Actions Taken So Far:

Describe any actions you have taken to address the situation prior to submitting this complaint.

Witness Information (if applicable):

- Full Name(s) of Witness(es): [Witness Name(s)]
- Contact Information of Witness(es):
 - Email Address(es): [Witness Email(s)]
 - Phone Number(s): [Witness Phone(s)]

Attachments (if applicable):

You may attach any supporting documents, emails, or evidence related to the incident(s) if available.

Declaration and Consent:

I declare that the information provided in this complaint form is true and accurate to the best of my knowledge. I understand that this complaint will be treated confidentially to the extent allowed by law and that it will be used to initiate an investigation into the reported incident(s) of sexual harassment. I consent to the company's investigation and acknowledge that I may be contacted for additional information or clarification.

Signature:

Date:

Appendix D: Sample Investigation Checklist

Instructions:

This investigation checklist is designed to assist investigators in conducting a thorough and impartial investigation into reported incidents of sexual harassment. This checklist should be used as a guide to ensure all relevant steps are taken during the investigation process.

Investigation Details:

Date of Investigation:

Investigator(s) Name(s):

Complainant's Name:

Alleged Harasser(s) Name(s):

Witnesses (if applicable):

1. Initial Assessment:

- Review the complaint form and any supporting documents provided.
- Determine the scope and nature of the complaint.
- Identify any potential conflicts of interest.

2. Interviews:

- Interview the complainant to gather their account of the incident(s).
- Interview the alleged harasser(s) to obtain their perspective.
- Interview any witnesses identified in the complaint.
- Ensure interviews are conducted in private, confidential settings.

3. Document Gathering:

- Collect any relevant documents, emails, or other evidence related to the incident(s).
- Preserve evidence to the extent possible.

4. Review Company Policies:

- Familiarize yourself with the company's anti-sexual harassment policy and relevant procedures.
- Ensure that the investigation is conducted in accordance with established policies.

5. Assess Credibility:

- Evaluate the credibility of each party involved.
- Consider consistency in statements, witness accounts, and any evidence presented.

6. Evaluate Severity:

- Determine the severity of the alleged harassment.
- Consider the impact on the complainant and the work environment.

7. Review Past Incidents:

- Check if there have been any previous incidents involving the complainant, alleged harasser, or witnesses.
- Consider any patterns or trends in behaviour.

8. Identify Relevant Policies Violations:

- Determine if the alleged conduct violates company policies or any applicable laws.
- Consider whether the conduct falls under quid pro quo harassment or hostile work environment harassment.

9. Conclusion:

- Based on the evidence and interviews, make findings regarding the complaint.
- Determine whether harassment occurred or not.

10. Remedial Actions:

- If harassment is substantiated, recommend appropriate remedial actions.
- Consider disciplinary measures, training, or other corrective actions.

11. Documentation:

- Maintain detailed records of the investigation process, including interview notes, evidence, and findings.
- Document the rationale behind your conclusions and recommendations.

12. Reporting:

- Prepare a written report of the investigation's findings and recommendations.
- Present the report to appropriate management and HR personnel.

13. Follow-Up:

- Monitor and ensure the implementation of recommended remedial actions.
- Conduct follow-up interviews if necessary.

14. Closure:

- Notify the complainant and alleged harasser(s) of the investigation's outcome.
- Keep the lines of communication open for any further concerns or questions.

This checklist is intended as a guideline for conducting investigations into incidents of sexual harassment. It should be adapted to suit the specific circumstances of each investigation and conducted with sensitivity and impartiality.

Appendix E: Approval and Implementation

1. Policy Approval:

The approval process for the anti-sexual harassment policy involves multiple steps to ensure that it aligns with our company's values and legal requirements. Here is an overview of the approval process:

1.1 Drafting and Review: The policy is initially drafted, typically by the HR department or legal counsel, with input from relevant stakeholders such as legal advisors, employee representatives, and management.

1.2 Legal Review: The draft policy undergoes a comprehensive legal review to ensure compliance with all applicable federal, state, and local laws and regulations.

1.3 Internal Review: The policy is shared internally with employees, managers, and other relevant parties for feedback and suggestions.

1.4 Management Approval: The final draft is presented to the company's senior management or board of directors for approval.

1.5 Legal Counsel Approval: Legal counsel reviews the final policy to confirm compliance with any newly enacted laws or regulations.

1.6 Policy Approval: Once all necessary approvals are obtained, the policy is formally approved and adopted by the company's leadership.

2. Implementation Plan:

The successful implementation of the anti-sexual harassment policy is crucial in ensuring its effectiveness. Here's an outline of the steps involved in implementing the policy:

2.1 Communication: The policy is communicated to all employees, contractors, and associates within the organization through various means, such as company-wide emails, in-person meetings, and the company's intranet or website.

2.2 Training Programs: Training programs are developed and conducted to educate employees about the policy, their rights and responsibilities, and how to recognize and report sexual harassment.

2.3 Acknowledgment Forms: Employees are required to sign acknowledgment forms confirming their receipt and understanding of the policy. This helps ensure that all individuals associated with the company are aware of the policy's contents.

2.4 Reporting Mechanisms: Clear and confidential reporting mechanisms are established, including contact information for reporting incidents, complaint forms, and instructions on how to proceed.

2.5 Investigations: Procedures for conducting thorough and impartial investigations into reported incidents are established. Training for investigators may also be provided.

2.6 Resources: Support resources, such as counselling services and external organizations that can assist victims of harassment, are identified and made available to individuals.

2.7 Compliance Audits: Regular compliance audits are conducted to assess adherence to the policy and identify areas that may require improvement.

2.8 Monitoring and Reporting: Metrics related to sexual harassment incidents, reporting, and investigations are monitored and reported to company leadership on an ongoing basis.

2.9 Awareness Campaigns: Awareness campaigns are initiated periodically to reinforce the importance of a harassment-free workplace culture.

2.10 Review and Update: The policy is periodically reviewed and updated to ensure its continued effectiveness and alignment with changing legal requirements.

This appendix outlines the process for approving and implementing our anti-sexual harassment policy, demonstrating our commitment to maintaining a respectful and harassment-free workplace.



Appendix F: Employee Acknowledgment of Anti-Sexual Harassment Policy

I, [REDACTED], hereby acknowledge that I have received, read, and understood the Anti-Sexual Harassment Policy of Solon India Private Limited (SIPL). I am aware of the importance of maintaining a harassment-free workplace and the organization's commitment to preventing and addressing sexual harassment.

Employee Information:

Employee ID (if applicable):

Job Title/Position:

Department/Unit:

Email Address:

Phone Number:

Acknowledgment:

I understand that it is my responsibility to adhere to the principles outlined in the Anti-Sexual Harassment Policy and to treat all individuals in the workplace with respect and dignity. I also acknowledge that I have been informed about the procedures for reporting incidents of sexual harassment as outlined in the policy.

Confidentiality:

I understand that all reports of sexual harassment will be treated with the utmost confidentiality to the extent allowed by law, and that my cooperation in any investigation is expected and appreciated.

Questions and Support:

I am aware that I can seek clarification or assistance regarding any aspect of the Anti-Sexual Harassment Policy from the Human Resources Department or other designated contacts within the organization.

Signature

Date:

