

Policy on Prevention of Sexual Harassment of Women at Workplace

INTRODUCTION

Striim Engineering Services India Private Limited (“**Striim**”) believes that a significant part of its success is based upon maintaining and developing an environment where its Employees (as defined in clause 1.1 below) can work in a friendly and productive atmosphere. The purpose of this Policy on Prevention of Sexual Harassment at Workplace (“**Policy**”) is to promote and encourage respect and dignity for your colleagues and others. Accordingly, any behaviour or conduct which constitutes or causes Sexual Harassment (as defined in clause 2.1 below) is unacceptable and will not be tolerated.

For the purpose of this Policy, the term ‘**Workplace**’ (as more particularly defined in clause 1.1 below) shall not only mean the office premises of Striim, but shall also mean any place visited by an Employee for his or her work arising during the course of employment. Striim through this Policy intends to protect its Employees from acts of Sexual Harassment against each other and also from third party(ies) at the Workplace.

Sexual Harassment can interfere with an individual’s work performance and create a hostile work environment. Striim recognises the problems that such harassment can have effect upon health, confidence and morale.

Social events which are not organized by Striim are excluded from the ambit of this Policy. However, whenever socializing with work colleagues, all Employees are expected to maintain an appropriate standard of behavior. Notwithstanding anything contained elsewhere in this Policy, action through the disciplinary process set out in this Policy will be taken against any Employee responsible for the Sexual Harassment of a work colleague outside working hours and outside the Workplace, including but not limited to cases, where:

- the reputation of Striim may be brought into question;
- such conduct could create a hostile or intimidating environment during working hours;
- such conduct could have an adverse effect on a victim’s ability to perform properly duties of employment or other engagement.

All Employees have a positive responsibility to comply with the Policy.

1. APPLICABILITY

- 1.1 This Policy is applicable to all Employees (including but not limited to the employees who work with Striim at its workplace (“**Workplace**” as defined below) on full time, part time, temporary, permanent or on a contract basis), present and future (hereinafter collectively referred to as “**Employee**”, or “**Employees**” as defined below) and shall be subject to the provisions of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (“**Act**”) and the rules made thereunder viz., the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Rules, 2013 (“**Rules**”) as amended from time to time and / or any other law as may be in force or applicable with regard thereto. Additionally, the Policy is equally applicable to any individual who provides services to Striim, such as contractors, consultants, seconded staff, interns, trainees and vacation students. All such individuals are required to adhere to the standards of conduct detailed in the Policy and also benefit from the protection which it affords.

For the purpose of this Policy:

“**Aggrieved Woman**” means in relation to the Workplace, a woman, of any age, whether employed or not, who alleges to have been subjected to any act of sexual harassment by the respondent and includes contractual, temporary, visitors.

“**District Officer**” means the officer notified under the Act.

“**Employee**” or “**Employees**” shall mean a person employed by Striim 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 the knowledge of Striim, whether for remuneration or not, or working on a voluntary basis or otherwise, whether the terms of employment are express or implied and includes a co-worker, a contract worker, probationer, trainee, apprentice or called by any other such name.

Notwithstanding anything contained elsewhere in this Policy, it is clarified that the above definition of the term “Employee” or “Employees” is intended solely for the purposes of this Policy and shall not, under any circumstance, entitle a person covered under the above definition to claim the status of an employee of Striim for any other purpose and/or under any other law.

“**Workplace**” shall mean Striim’s office premises situated at Chennai, Tamil Nadu and shall include any place visited by the Employees working at such office premises arising out of or during the course of employment including transportation provided by Striim for undertaking such journey.

- 1.2 The Policy is in effect and shall apply to all allegations of Sexual Harassment by or against all individuals specified in clause 1.1 above.
- 1.3 Subject to the Act and/or the Rules, Striim reserves the right to amend, modify, and / or rescind the Policy or any part of it at any time without prior notice.
- 1.4 All individuals to whom this Policy is applicable are prohibited from committing act(s) of Sexual Harassment.

2. DEFINITION OF SEXUAL HARASSMENT AND EXAMPLES

- 2.1 “**Sexual Harassment**” includes anyone or more of the following unwelcome acts or behavior (whether directly or by implication) namely:

- (i) physical contact and advances; or
- (ii) a demand or request for sexual favours; or
- (iii) making sexually coloured remarks; or
- (iv) showing pornography; or

The following circumstances, among other circumstances, if it occurs or is present in relation to or connected with any act or behaviour of Sexual Harassment may amount to Sexual Harassment:

- (a) implied or explicit promise of preferential treatment to the victim in her/his employment; or
- (b) implied or explicit threat of detrimental treatment to the victim in her/his employment; or
- (c) implied or explicit threat about present or future employment status of the victim; or
- (d) interference with the victim's work or creating an intimidating or offensive or hostile work environment for her/him; or
- (e) humiliating treatment likely to affect the victim's health or safety; or
- (f) any other unwelcome physical, verbal or non-verbal conduct of sexual nature.

3. CONSTITUTION OF INTERNAL COMPLAINTS COMMITTEE TO PREVENT AND DEAL WITH SEXUAL HARASSMENT

- 3.1 Striim has, by an order in writing, established a committee to deal with all allegations of Sexual Harassment ("**Internal Complaints Committee**") at the Workplace under the Act.
- 3.2 The Internal Complaints Committee will consists of 4 (four) members with atleast 2(two) of its members being women. One of the members of the Internal Complaints Committee, will be a woman from amongst non-governmental organisation or association committed to the cause of women or a person familiar with the issues relating to Sexual Harassment ("**Independent Member**"), who is nominated by Striim. The presiding officer of the Internal Complaints Committee will be a senior level woman Employee of Striim nominated by Striim ("**Chairperson**"). The remaining 2 (two) members of the Internal Complaints Committee will be Employees of Striim. The names of the Striim Employees who are members on the Internal Complaints Committee and of the Independent Member shall, along with their contact telephone numbers and other details be displayed at a conspicuous place in the Workplace [and also be available on the Striim intranet], which is accessible to all Striim Employees. Further, the details of current members of the Internal Complaints Committee are annexed to this Policy.
- 3.3 The term of office of the members of the Internal Complaints Committee shall be for a period of maximum upto 3 (three) years and after the expiry of the said period, Striim shall reconstitute the Internal Complaints Committee. [However, Striim may at its discretion choose to re-constitute the Internal Complaints Committee at any time prior to the expiry of the term in accordance with the provisions of the Act and the Rules.]
- 3.5 In case of a vacancy in the Internal Complaints Committee for any reason, prior to the expiry of the term as referred to under clauses 3.3 and 3.4 above, Striim shall nominate a person to fill up the vacancy so caused.
- 3.6 The 3 (three) members of the Internal Complaints Committee, who are Employees of Striim, will cease to be members of the Internal Complaints Committee from the date of termination of their employment with Striim, for any reason whatsoever.
- 3.7 For the purpose of this Policy, the Internal Complaints Committee has been constituted, which, while dealing with a complaint of Sexual Harassment, will function as an independent body and conduct itself in an impartial, bonafide and unbiased manner.

4. ROLES AND RESPONSIBILITY OF STRIIM

- 4.1 Striim shall, amongst others,:-

- (i) ensure implementation of the Policy in accordance with the Act and the Rules;
- (ii) ensure proper constitution and functioning of the Internal Complaints Committee;
- (iii) organise seminars, workshops, orientation and awareness programmes for the Employees and/ or the members of the Internal Complaints Committee at regular intervals;
- (iv) provide a safe working environment at the Workplace which shall include safety from the persons coming into contact at the Workplace;
- (v) provide necessary facilities to the Internal Complaints Committee for dealing with the complaint of Sexual Harassment;
- (vi) assist in securing the attendance of relevant persons before the Internal Complaints Committee;
- (vii) make available such information to the Internal Complaints Committee as it may require having regard to the complaint made under the Policy;
- (viii) ensure penal and other consequences of Sexual Harassment are displayed at a prominent place in the Workplace.

- [4.2] **Responsibilities of Individual:** It is the responsibility of all to respect the rights of others and to never encourage harassment. It can be done by:
- a. Refusing to participate in any activity which constitutes harassment
 - b. Supporting the person to reject unwelcome behavior
 - c. Acting as a witness if the person being harassed decides to lodge a complaint

All are encouraged to advise others of behavior that is unwelcome. Often, some behaviors are not intentional. While this does not make it acceptable, it does give the person behaving inappropriately, the opportunity to modify or stop their offensive behavior.

- 4.3. **Responsibilities of Managers:** All managers at Striim must ensure that nobody is subject to harassment and there is equal treatment. They must also ensure that all employees understand that harassment will not be tolerated; that complaints will be taken seriously; and that the complainant, respondent/s, or witnesses are not victimized in any way.]

5. REDRESSAL PROCEDURES

5.1 Initiation and processing of Complaint

- 5.1.1 Any Aggrieved Woman who faces Sexual Harassment at the Workplace ("**Complainant**"), shall, within a period of 3 (three) months from the date of the incident and in case of a series of incidents within a period of 3 (three) months from the date of the last incident, report the same to the Internal Complaints Committee [and / or send a written complaint to the e-mail ID **[please insert id]**. Such complaint sent to this email address shall be received and processed in the strictest of confidence.] The person(s) accused of an act of Sexual Harassment shall be referred to as the "**Accused**".
- 5.1.2 In case the complaint of Sexual Harassment cannot be made in writing, any member of the Internal Complaints Committee or the Chairperson of the Internal Complaints Committee shall render all reasonable assistance to the Complainant for making the complaint in writing. The Internal Complaints Committee may, for the reasons to be recorded in writing, extend the time limit for preferring a complaint of Sexual Harassment by 3 (three) months, if it is satisfied that the circumstances were such which prevented the Complainant from filing a complaint within the prescribed period.

- 5.1.3 If the Complainant is unable to make a complaint:
- (a) on account of physical incapacity or death or otherwise, the legal heir, relative, friend, co-worker, an officer of the National Commission for Woman or State Woman's Commission or any person who has knowledge of the incident with the written consent of the Complainant. may make a complaint on behalf of the complainant.
 - (b) on account of mental incapacity or death or otherwise, the relative, friend, co-worker, a special educator, a qualified psychiatrist or psychologist the guardian or authority under whose care the victim is receiving special treatment or case or any person who has knowledge of the incident jointly with the Complainant or relative or friend or a special educator or qualified psychiatrist or psychologist the guardian or authority under whose care the Complaint is receiving treatment or care.
 - (c) for any other reason is unable to make a complaint, a complaint may be filed by the person who has knowledge of the incident with her written consent.
 - (d) where the Complainant is dead m a complaint may be filed by any person who has knowledge of the incident with eth written consent of the legal heir of the Complainant.
- 5.1.4 At the time of lodging of the complaint, the Complainant or the other person(s) entitled under the Rules to make such complaint, shall submit 6 (six) copies of the complaint along with supporting documents and the names and addresses of the witnesses.
- 5.1.5 [Any complaint received by any member of the Internal Complaints Committee shall be shared with all other members of the Internal Complaints Committee on the same day.

The Chairperson shall then proceed to call a meeting of the Internal Complaints Committee, in a manner that such meeting is held within 5 (five) working days from the date of receipt of the complaint, and give advance intimation of such meeting to the Complainant.

In case any member of the Internal Complaints Committee or anyone involved in the investigation of the complaint has a Conflict (as defined below) for that complaint, he/she shall disclose the same to the Internal Complaints Committee within 1 (one) working day from the date of receipt of the complaint from the Chairperson or other member of the Internal Complaints Committee and excuse himself/herself from the Internal Complaints Committee. Such conflicted member shall not participate any further in the proceedings of that particular complaint and shall continue to be bound by the obligation to retain complete confidentiality with respect to his/her knowledge of the facts of the complaint.

Upon receipt of such intimation from the conflicted member, the Chairperson or where the Chairperson is the conflicted member, any other member of the Internal Complaints Committee shall immediately write to the management of Striim for a substitution of such member for the concerned complaint.

The management of Striim shall nominate a person in place of the conflicted member within 2 (two) working days from the date of receipt of such request from the Chairperson or any other member of the Internal Complaints Committee, as the case may be. The person so nominated by the management of Striim in place of the conflicted member shall participate in all the meetings of that particular complaint and shall have all such powers and responsibilities as referred to under this Policy.

For the purpose of this Policy, a “**Conflict**” shall be deemed to have arisen, if a member of the Internal Complaints Committee happens to be the immediate supervisor or directly reports to or is a relative of the Complainant or the Accused or is the Accused and/or is witness for the purpose of proving the case of either party to the complaint.]

- 5.1.6 At the first meeting of the Internal Complaints Committee, the Complainant shall be heard and her statement recorded and duly signed and the Internal Complaints Committee shall decide whether the complaint requires to be proceeded with. In the event the Internal Complaints Committee, on a prima facie appreciation of the facts so recorded, finds that no act of Sexual Harassment is committed by the Accused, it may dismiss the complaint after recording its reasons in writing for doing so and inform the parties to the complaint about the same.

In case the Internal Complaints Committee decides to proceed with the complaint, it shall send a copy of the complaint received by it along with supporting documents to the Complainant within 7 (seven) working days of receiving the complaint.

- 5.1.7 If the Accused, wishes to submit a reply to the complaint, he/she shall do so within 10 (ten) working days from the date of receipt of the complaint by him along with supporting documents and the names and addresses of the witnesses, if any.
- 5.1.8 After receipt of Accused’s reply, if any, the Internal Complaints Committee shall explore the possibility of a mutual settlement between the Complainant and the Accused through conciliation (as per clause 5.2 below). But no monetary settlement shall be made as a basis of such conciliation. If no settlement is reached between the Complainant and the Accused and the Accused is an Employee then, the Internal Complaints Committee shall proceed to make an enquiry into the complaint under clause 5.3 below in accordance with the principles of natural justice and this Policy.

5.2 Conciliation

- 5.2.1 Where a settlement has been arrived at between the Complainant and the Accused through conciliation, the Internal Complaints Committee shall (i) record the settlement so arrived; (ii) forward the same to the management of Striim to take action as specified in its recommendation; (iii) provide a copy of the settlement so recorded to the Complainant and the Accused; and (iv) not conduct an enquiry into the complaint.
- 5.2.2 If no settlement is reached between the Complainant and the Accused and the Accused is not an Employee then, the Internal Complaints Committee shall, if the Complainant so requests in writing forward the complaint to the police.
- 5.2.3 If the Complainant informs the Internal Complaints Committee that any term or condition of the settlement reached with the Accused through conciliation has not been complied with by the Accused, the Internal Complaints Committee shall, after determining that the Accused has indeed violated or not-complied with any term or condition of the settlement, proceed to make an enquiry into the complaint in accordance with clause 5.3 below, in case the Accused is an Employee or if the Complainant so requests in writing forward the complaint to the police in case the Accused is not an Employee.

5.3 Enquiry

- 5.3.1 The Internal Complaints Committee shall meet to proceed with the enquiry at a venue and time as may be decided by it and communicate the same to the Accused and the Complainant.
- 5.3.2 The Internal Complaints Committee shall follow the principles of natural justice in all its proceedings and shall maintain confidentiality of the contents of the complaint, the identity and addresses of the Complainant, the Accused and any witnesses, any information relating to the conciliation and enquiry proceedings and its recommendations.
- 5.3.3 In conducting the enquiry, a minimum of 3 (three) members of the Internal Complaints Committee, including the Chairperson, shall be present.
- 5.3.4 The Complainant and the Accused shall both appear in person and cannot be represented by a legal practitioner or any other representative at any stage of the proceedings before the Internal Complaints Committee.
- 5.3.5 [Striim shall provide such support as may be required by the Internal Complaints Committee for conducting the enquiry. The Chairperson shall preside over the enquiry and shall maintain an attendance register in respect of all the meetings of the Internal Complaints Committee and a record of all the proceedings of the Internal Complaints Committee.]
- 5.3.6 [The Chairperson shall document all proceedings of the Internal Complaints Committee and the Complainant and the Accused shall confirm and verify the same by signing the required document(s).
- 5.3.7 The Internal Complaints Committee shall hand over to the Complainant a copy of the Accused's reply to the complaint. If the Complainant or the Accused desire to examine any witnesses they shall communicate in writing to the Internal Complaints Committee, the names of witnesses whom they propose to so examine.
- 5.3.8 If the Complainant or the Accused desires to tender any document by way of evidence before the Internal Complaints Committee, they shall supply copies of such documents to the Internal Complaints Committee and to the other party.
- 5.3.9 The Internal Complaints Committee shall be authorized to seek from the Complainant, Accused, witnesses, Striim or other Employees such information and documents as deemed appropriate by it for conducting the enquiry and be responsible for safe keeping of such information and documents.
- 5.3.10 Upon completion of the process specified in clauses 5.3.1 to 5.3.9 above, the Complainant and the Accused shall have the right to lead evidence and to cross-examine witnesses.]
- 5.3.11 The Internal Complaints Committee shall have the right to terminate the enquiry proceedings or to give an ex-parte order on the complaint, if the Complainant or the Accused fails, without sufficient cause, to present herself or himself for 3 (three) consecutive hearings convened by the Chairperson of the Internal Complaints Committee. However, such termination or ex-parte order shall not be passed without giving a 15 (fifteen) days' prior notice in writing to the Complainant or the Accused, as the case may be.

5.3.12 [The Complainant or other person making the complaint, the Accused and the witnesses shall extend fullest co-operation to the Internal Complaints Committee and any failure to co-operate, or giving of wrong or misleading information, or withholding of information by them shall be a violation of this Policy and shall be dealt with appropriately by Striim.]

5.3.13 [(A) Anytime during the pendency of the enquiry, Striim may, in its sole discretion, require the Accused not to attend work and/or not to perform all or any of his/her duties of employment, or assign different duties to the Accused. Striim will continue to pay salary and/or contractual benefits during this period to the Accused who shall remain bound by all the duties of employment or other engagement unless Striim releases the Accused expressly in writing from any such duties.]

(B) Further, during the pendency of the enquiry, the Internal Complaints Committee may, on a written request made by the Complainant, recommend to the management of Striim to:

- (a) transfer the Complainant or the Accused to any other Workplace; or
- (b) grant paid leave to the Complainant up to a period of 3 (three) months; or
- (c) restrain the Accused from reporting on the work performance of the Complainant or writing /her appraisal report and assign such tasks to another Employee.

The leave granted to the Complainant under this clause 5.3.13 (B) shall be in addition to the leave that she would otherwise be entitled to. On the recommendation of the Internal Complaints Committee, under this clause 5.3.13 (B), the management of Striim shall implement such recommendations and send a report of such implementation to the Internal Complaints Committee.

5.3.14 The enquiry as stated above shall be completed within a period of 90 (ninety) days.

5.4 Report

5.4.1 On completion of the enquiry, the Internal Complaints Committee shall complete a written report which shall include a summary of the proceedings and the evidence adduced by the parties and the recommendations of the Internal Complaints Committee (“**Report**”). All members of the Internal Complaints Committee who participate in the enquiry proceedings shall sign the said Report. The Report shall be submitted to the management of Striim within 10 (ten) days of completion of the enquiry. A copy of the Report shall also be provided to the concerned parties, who shall keep the same confidential.

5.4.2 (A) Where the Internal Complaints Committee arrives at a conclusion that the allegation against the Accused is malicious or the Complainant has made the complaint knowing it to be false or has produced any forged or misleading document, it may recommend to the management of Striim to take, amongst others, any of the following actions against the Complainant:

- require the Complainant to submit a written apology to the Accused; or
- require the Complainant to undergo a counselling session or carry out community service;
- issue a written warning, reprimand or censure to such Complainant; or

- give poor recommendations or negative evaluation in respect of the Complainant; or
- effect demotion or reduction in rank of the Complainant; or
- impose fine on the Complainant subject to and in accordance with the provisions of the Payment of Wages Act, 1936; or
- suspend the Complainant from service subject to payment of subsistence allowance in accordance with applicable laws; or
- withhold the promotion of such Complainant; or
- withhold any pay rise or increment of such Complainant; or
- terminate the employment or other engagement of such Complainant without notice or notice pay; or
- take any other action against the Complainant as deemed fit by it.

It is clarified that a mere inability to substantiate a complaint or provide adequate proof shall not attract action against a Complainant. Further, the malicious intent on part of the Complainant shall be established after an enquiry before any action is recommended against the Complainant.

- (B) If the Internal Complaints Committee arrives at a conclusion that during the enquiry any witness has given false evidence or produced any forged or misleading document, it may recommend the management of Striim to take, amongst others, any of the following actions against the witness:
- require the witness to submit a written apology to the Accused or the Complainant, as the case may be; or
 - require the witness to undergo a counselling session or carry out community service;
 - issue a written warning, reprimand or censure to such witness; or
 - give poor recommendations or negative evaluation in respect of the witness; or
 - effect demotion or reduction in rank of the witness; or
 - impose fine on the witness subject to and in accordance with the provisions of the Payment of Wages Act, 1936; or
 - suspend the witness from service subject to payment of subsistence allowance in accordance with applicable laws; or
 - withhold the promotion of such witness; or
 - withhold any pay rise or increment of such witness; or
 - terminate the employment or other engagement of such witness without notice or notice pay; or
 - take any other action against the witness as deemed fit by it.
- (C) Where the Internal Complaints Committee arrives at a conclusion that the allegation(s) against the Accused have not been established by the Complainant, it shall recommend to the management of Striim that no action is required to be taken in the matter.
- (D) Where the Internal Complaints Committee arrives at the conclusion that the allegation against the Accused has been proved, it shall recommend to the management of Striim:
- (i) to take, amongst others, any of the following actions against the Accused:-

- require the Accused to submit a written apology to the Complainant; or
- require the Accused to undergo a counselling session or carry out community service;
- issue a written warning, reprimand or censure to such Accused; or
- give poor recommendations or negative evaluation in respect of the Accused; or
- effect demotion or reduction in rank of the Accused; or
- impose fine on the Accused subject to and in accordance with the provisions of the Payment of Wages Act, 1936; or
- suspend the Accused from service subject to payment of subsistence allowance in accordance with applicable laws; or
- withhold the promotion of the Accused; or
- withhold any pay rise or increment of the Accused; or
- terminate the employment or other engagement of the Accused without notice or notice pay; or
- take any other action against the Accused as deemed fit by it;

and

- (ii) to deduct, from the salary or wages of the Accused or other amounts payable by Striim to the Accused, such sum as it may consider appropriate to be paid to the Complainant or to her legal heir, as it determined by it. In case the management of Striim, is unable to make such deduction from the salary or wages of the Accused or other amounts payable by Striim to the Accused, due to his/her being absent from duty or cessation of employment or other engagement with Striim, it may direct the Accused to pay such sum to the Complainant. In case the Accused fails to pay the sum referred to above, the Internal Complaints Committee may forward the order for recovery of the sum as an arrear of land revenue to the concerned District Officer.

For the purpose of determining the sums to be paid to the Complainant, the Internal Complaints Committee shall have regard to:

- (a) the mental trauma, pain, suffering and emotional distress caused to the Complainant;
 - (b) the loss in the career opportunity due to the incident of Sexual Harassment;
 - (c) medical expenses incurred by the Complainant for physical or psychiatric treatment;
 - (d) the income and financial status of the Accused;
 - (e) feasibility of such payment in lump sum or in installments.
- (E) Any person aggrieved with the recommendations made under this clause 5.4.2 or non-implementation of such recommendations may prefer an appeal to the appellate authority notified under clause (a) of Section 2 of the Industrial Employment (Standing Orders) Act, 1946. Such appeal shall be preferred within a period of 90 (ninety) days from the date of the recommendations.

The management of Striim shall act upon the recommendation of the Internal Complaints Committee as contained in the Report within 60 (sixty) days of receipt of the Report.

5.5 Implementation

- 5.5.1 The management of Striim shall provide all necessary assistance for the purpose of ensuring full, effective and speedy implementation of the recommendations of the Internal Complaints Committee.
- 5.5.2 In case the management of Striim is of the view that there is any ambiguity in the recommendations of the Internal Complaints Committee as contained in the Report, it shall send the Report back to the Internal Complaints Committee for clarifying the areas of ambiguity. The Internal Complaints Committee shall examine the areas of ambiguity highlighted by the management of Striim and provide suitable responses to the management of Striim.

Upon receipt of the clarifications from the Internal Complaints Committee, if the management of Striim is not satisfied with the recommendations contained in the Report, it may, with the approval of the Board of Directors of Striim, prefer an appeal before the appellate authority notified under clause (a) of Section 2 of the Industrial Employment (Standing Orders) Act, 1946 within a period of 90 (ninety) days from the date of receipt of the Report by it.

5.6 Records

- 5.6.1 The Internal Complaints Committee shall in each calendar year prepare and submit an annual report in the manner as prescribed under the Act and/or the Rules
- 5.6.2 Striim shall inform to the concerned District Officer in writing the number of cases of Sexual Harassment filed during the calendar year, if any, and their disposal under the Act.

6. CONFIDENTIALITY AND PROTECTION AGAINST VICTIMIZATION

- 6.1 Striim recognizes that confidentiality of all matters relating to alleged acts of Sexual Harassment is of paramount importance. The Internal Complaints Committee and other individuals responsible for the implementation of the Policy will respect the confidentiality and privacy of individuals reporting or accused of Sexual Harassment. Striim shall ensure that a Complainant and/or a witness and/or an Accused shall not be subject to any unfavourable treatment whatsoever as a result of their participation in such proceedings.
- 6.2 All persons such as those comprising the Internal Complaints Committee, management of Striim, Complainant, Accused, witnesses and/or any other connected person shall keep all information pertaining to the Sexual Harassment matter, including but not limited to the contents of the complaint, the identity and addresses of the Complainant, Accused and witnesses, any information relating to conciliation, enquiry proceedings, Report and/or recommendations of the Internal Complaints Committee and the action taken by the management of Striim under this Policy as strictly confidential and shall ensure that the same is not published, communicated or made known to the public, press and media in any manner. However, notwithstanding anything to the contrary stated herein, information regarding the justice secured to any victim of Sexual Harassment, may be disseminated by

the management Striim, without disclosing the name, address, identity or any other particulars which may lead to the identification of the victim and/or the witness. In addition to the foregoing, both the Complainant and the Accused shall sign an undertaking in the prescribed format of Striim categorically agreeing not to disclose any information mentioned above under any circumstance whatsoever.

7. THIRD PARTY HARASSMENT

- 7.1 On receipt of a complaint of Sexual Harassment at Workplace by an Aggrieved Woman against a third party or vice-versa during the course of employment or other engagement of the aggrieved Woman, the Internal Complaints Committee will actively assist the Complainant in pursuing the complaint in accordance with the provisions of the Act and make appropriate efforts to secure her safety at the Workplace.

8. SAVINGS

- 8.1 The proceedings under this Policy shall not be stalled or postponed merely because the Complainant and/or the Accused are proceeding against each other under any other provision of civil or criminal law.
- 8.2 The provisions of this Policy shall not restrict the rights of Striim or the Complainant to proceed against the Accused or any witness for any other misconduct or reliefs or to pursue any criminal or civil remedies under law.

ANNEXURE

INTERNAL COMPLAINTS COMMITTEE

S.No.	Name	Address	Telephone Number	Email ID
1	Minu Dwivedi	Sandstone Crest, Opposite Park Plaza Hotel Sushant Lok - Ph 1, Gurugram 122 009, India	+911244390642	minu@jsalaw.com
2	Vino Chithra	Space Olympia Tech Park, 10th Floor, Citius Block No: 1, SIDCO Industrial Estate, Guindy, Chennai, Tamilnadu	044-6145 9012	vino@striim.com
3	Sneha Parthiban	Space Olympia Tech Park, 10th Floor, Citius Block No: 1, SIDCO Industrial Estate, Guindy, Chennai, Tamilnadu	044-6145 9012 +91-9940164362	sneha@webaction.com
4	Henry Nathan	Space Olympia Tech Park, 10th Floor, Citius Block No: 1, SIDCO Industrial Estate, Guindy, Chennai, Tamilnadu	044-6145 9012	s.henry@striim.com