

Internal	POSH Policy	
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Policy on Prevention, Prohibition and Redressal of
Sexual Harassment at workplace – POSH Policy

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1.0 OBJECTIVE:

- a) At Fourth Dimension, it is our desire to promote a healthy and congenial working environment irrespective of gender, caste, creed or social class of the employees. We value every individual and are committed to protecting the dignity and respect of every individual irrespective of Gender.
- b) Therefore, we have “zero-tolerance” for sexual harassment and any act of sexual harassment will invited serious disciplinary action. This policy is to educate the employees about what conduct constitutes sexual harassment, the way and means which we are adopting to prevent occurrence, to enable a fair mechanism for dealing with such conduct.

2.0 WHO IS COVERED UNDER THIS POLICY AT 4D?

- a) Fourth Dimension rules for prevention and redressal of sexual harassment at workplace are applicable to all employees of Fourth Dimension - permanent, temporary, trainees, contract, consultant (directly / indirectly), third party roll employees, vendors, clients, etc.
- b) An alleged act(s) of sexual harassment, whether the incident has occurred during or beyond duty hours.
- c) Any act of sexual behavior is included if such an act is perceived to be detrimental to a healthy and congenial work environment. This policy is applicable when both or the alleged harasser & the victim are employees of the 4d.

3.0 DEFINITION OF SEXUAL HARASSMENT:

- a) “Sexual harassment” is, any unwelcome sexually determined behavior, such as physical contact and advances a demand or request for sexual favors: whether verbal, textual, graphic and electronic or by any other means actions, sexually colored remarks, showing pornography and any other unwelcome physical, verbal or non-verbal conduct of sexual nature.
- b) This includes verbal, non-verbal and physical conduct such as obnoxious comments or utterances, remarks or jokes, letters, phone calls, SMS, WhatsApp, Instagram, Facebook, LinkedIn, E-mails, gestures, showing pornography, stalking, sounds or display of a nature with sexual. Overtures.

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- c) It also includes a demand or request for sexual favors in return for with a promise of work-related favors such as performance appraisals, promotions, transfers, salary increase and employment or any other form of reward or recognition.
- d) Acts of sexual behavior which may arise out of coercion ranging from pressure for personal favors to sexual favors as a 'quid-pro-quo', intrusion into the private lives, etc. Or that which may lead to hostile working condition may also be considered as a form of sexual harassment.
- e) Definition of sexual harassment shall include any harassment caused to female or male employees. It would also include harassment caused to or by either gender.

4.0 INTERNAL COMMITTEE:

- a) Internal committee (hereinafter called IC) is constituted in accordance with section 4 of the act to deal with complaints on sexual harassment.
- b) With reference to IC, a committee has been constituted by the management to consider and redress the complaints related to sexual harassment. The detail about the presiding officer and members of the committee is provided in "annexure a".

5.0 WHOM TO CONTACT IN CASE OF AN INCIDENT OF SEXUAL HARASSMENT?

- a) An employee may contact IC members and send a written complaint to the internal committee, or the employee may also email the complaint to email id EEOC@fourdtech.com.
- b) The employee can also contact their Team Leader of the respective department, HR department, or any other employee. Upon being intimated, the Team Leader or HR personnel or any other employee can send an email communication to the internal committee, providing all the necessary details of the complaint with enough proof.
- c) The complaint should include the contact details of the complainant/ victim such as name, address, contact number, department etc.
- d) In both the cases above, the written complaint/ email must provide the details of the incident together with name/s of the alleged harasser/s and victim/s as applicable.

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6.0 PROCESS OF THE COMMITTEE:

- a) Depending upon the nature of the complaint, the IC may initiate an inquiry. The IC shall provide an opportunity to the victim as well as the alleged harasser to represent their position and provide their explanations.
- b) The complainant / victim and alleged harasser should go through the guidelines of the IC to better understand their rights and the procedure adopted. In the event an enquiry is found to be necessary, the following procedure shall be followed by the committee.
- c) An inquiry is initiated through the members of IC.
- d) Discussions are conducted with the complainant/victim and alleged harasser as required.
- e) Written record of all discussions is to be maintained under strict confidentiality by the committee.
- f) No legal practitioner shall be allowed to represent the parties in their case at any stage of the proceedings before IC. Both the parties will be given equal opportunity of being heard.
- g) The IC will submit the findings and present recommended action thereon to the HR Head.
- h) The final decision shall be communicated to the victim and the alleged harasser.
- i) Fourth Dimension will exercise extreme care in training the entire process of sexual harassment redressal procedure and mainly they protect the victim /harassed equally.

7.0 THIRD PARTY HARASSMENT:

- a) Any harassment brought to the notice, arising out of an act or omission by any third party or an outsider.
- b) Fourth Dimension will take necessary and reasonable steps in assisting the affected person in terms of support and preventive action.

8.0 VICTIMIZATION / RETALIATORY ACTION:

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- a) Every employee and Team Leader must contact the IC members immediately upon receiving a complaint and must be alert to any possible retaliatory actions.
- b) The victim may directly communicate with the members of the IC in case of any retaliatory action.
- c) In case of any possibility of retaliatory action, the IC must preferably transfer the alleged harasser or the victim to avoid victimization. The IC should make its best efforts to protect the interests of the victim from victimization.

9.0 ROLES & RESPONSIBILITIES OF AN EMPLOYEE:

- a) All the employees are encouraged to familiarize themselves with the key elements of the policy.
- b) No Employee should involve any acts which amount to sexual harassment at the workplace.
- c) Report the incidents of sexual harassment without fear or favor immediately.
- d) Create an environment of conduciveness for co-workers to work together without fear of harassment.
- e) Employees should get clarification from HR whenever in doubt.

10.0 ROLES & RESPONSIBILITIES OF INTERNAL COMMITTEE:

- a) IC should notify the time and date of the meeting to be held to the compliant / victim and the alleged harasser.
- b) Enquiry to be conducted in a neutral location which provides conducive environment for both the victim and alleged harasser.
- c) IC should maintain confidentiality during the time of inquiry.
- d) IC should allow both the parties to bring relevant and appropriate evidences related to the case.
- e) Appropriate recordings of each enquiry are to be maintained.
- f) No member of the IC should disclose any of the information about the employee to other staff in the office.
- g) The conclusion of the findings and report to be handed over to the HR head who will in turn information to both the parties concerned.
- h) The above action receiving, enquiring, investigating and reporting should be completed within

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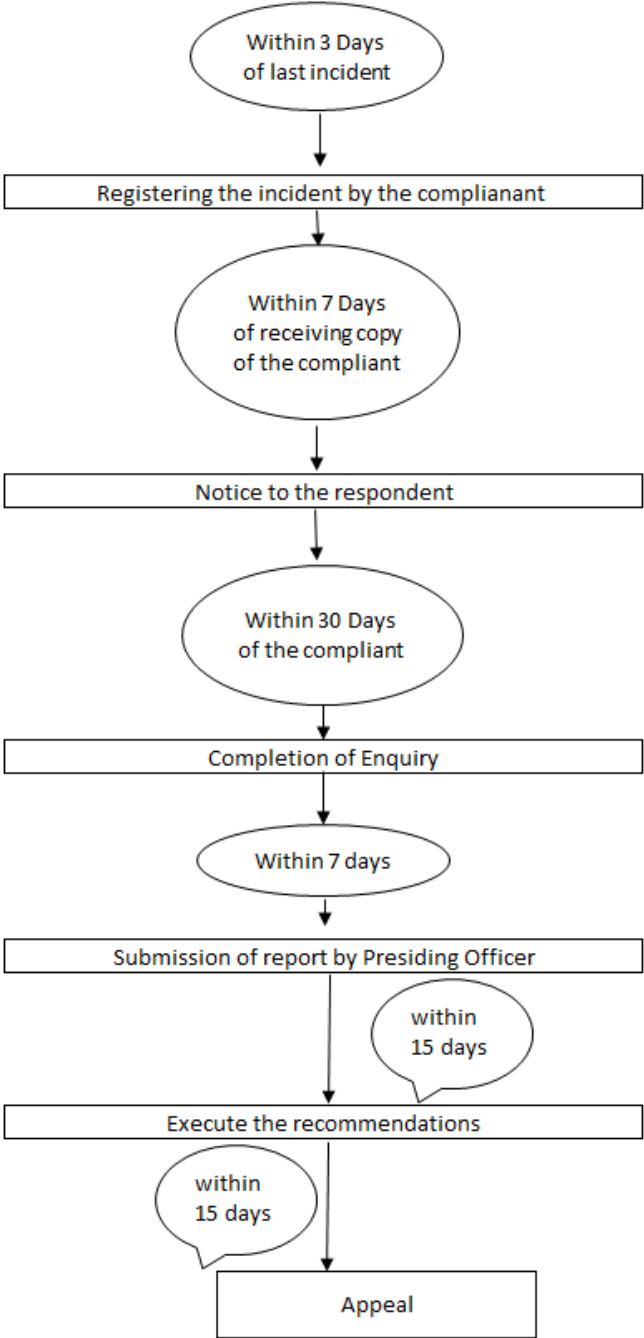
90 days.

- i) The contents of the complaint, details of the alleged harasser, information and reports of the IC should not be communicated, published or made known to the public, press and media etc.
- j) The IC at the request of the aggrieved person, before initiating the inquiry, can take steps to settle the matter through conciliation. However, it has been made clear that no monetary settlement should be made as basis of conciliation.
- k) The IC members would hold office for three years from the date of their nomination.
- l) The IC shall organize programmes for the gender sensitization of employees through workshops, seminars, etc. It may take the assistance of specialized NGO counselors, etc. if necessary, for this purpose.
- m) The IC shall meet once a quarter even if there is no live case, and review.
- n) The IC will provide counselor services to the Complainant / Victim and alleged harasser on request.

11.0 FALSE OR MALICIOUS COMPLAINTS:

Where the Internal Committee arrives at a conclusion that the alleged against the respondent is malicious or the aggrieved person or any person making the complaint has made the complaint knowing it to be false or has produced any forged or misleading documents, it may recommend to the employer to take action against the complaint who has made the complaint.

12.0 PROCESS FLOW CHART



Note: No cases should not be pending for more than 90 days.

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Grievance related to POSH (Prevention of Sexual Harassment), please call — any of the following members or email to given below Internal Committee Members (IC)

S. N	Name	Email ID	Role	Location	Department	Contact Detail
1	Gnanamani V	gm@fourdtech.co.in	Member	Chennai	HR	9840711931
2	Saravanakumar S	saravanakumar@fourdtech.com	Member	Chennai	InfoSec Manager	8754485958
3	Kalaiselvi G	kalaiselvi.g@fourdtech.co.in	Member	Chennai	Admin	9952978153
4	Poornima	poornima@fourdtech.co.in	Member	Chennai	Sales	9840711958
5	Gayathri M	gayathri.m@fourdtech.com	Member	Chennai	Cloud-International Sales	9940175504
6	Adithiya A	adithiya.a@fourdtech.co.in	Member	Chennai	HR	6381386240
7	Arul Archana A	arularchana.a@fourdtech.co.in	Member	Chennai	MSS	7598956968
8	M. Saraswathi	msaraswati@ceiamerica.com	Member	Delhi	External- CEI	9841083661