



# POLICY AGAINST SEXUAL HARASSMENT AT WORKPLACE

Version	Status	Effective Date
1.0	Approved	1 <sup>st</sup> April 2025
Author	Reviewer	Approver
HR & Legal Department	Legal Department	Navneet Kaushik – Authorized Signatory

STL Networks Limited under the brand name 'Invenia'



## STL Networks Limited

Corporate office : Capital Cyberscape, 15<sup>th</sup> and 16<sup>th</sup> Floor, Sector 59, Gurugram, Haryana 122102 | T : +91 124 4561850  
Registered office : 4<sup>th</sup> Floor, Godrej Millennium, Koregaon Park Road 9, STS 12/1, Pune, Maharashtra 411001

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investors@inveniatech.com

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## I. OBJECTIVE

STL Networks Limited (under the brand name 'Invenia') "Company" or "we" is committed to creating and maintaining a secure work environment where it's Employees, agents, vendors and partners can work and pursue business together in an atmosphere free of harassment, exploitation and intimidation caused by acts of Sexual Harassment within but not limited to the office premises and other locations directly related to the Company's business.

The objective of this Policy is to provide protection against sexual harassment of women at workplace and for the prevention and redressal of complaints of sexual harassment and for matters connected therewith.

All concerned should take cognizance of the fact that the Company strongly opposes sexual harassment, and that such behavior against women is prohibited by the law as set down in "**The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 ('Act')** and **Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Rules, 2013 ('Rules')** as well as the terms of employment. Commission of any act of sexual harassment as defined in the Act and in this Policy shall result in strict disciplinary action.

At Invenia, we have zero-tolerance for sexual harassment. We value each and every employee working with us and wish to protect their dignity and self-respect. In doing so, we are determined to promote a working environment in which persons of both genders complement each other as equals in an environment that encourages maximum productivity and to safeguard personal dignity.

We at Invenia are committed towards giving every employee a just and fair hearing on issues encountered by them at the workplace with special attention to sexual harassment. The Company will take serious disciplinary action against any victimization of the employee who is complaining or the alleged harasser that may result from a complaint.

Our Policy is formulated in view of the provisions of the Act and the Rules. While the Policy covers all the key aspects of the Act, for any further clarification reference shall always be made to the Act and the provisions of the Act shall prevail.

## II. SCOPE

Company's Policy with regard to **Prevention, Prohibition and Redressal of Sexual Harassment** covers every "Employee" across the Company and encourages every Employee who believes they are sexually harassed to use the redressal mechanism as provided in the Policy.

The Policy is with respect to **Prevention, Prohibition & Redressal of Sexual Harassment** which may arise

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in places not limited to geographical location viz. Company's offices / branches but includes all such places or locations where acts are conducted in context of working relationships or whilst fulfilling professional duties or which may be visited by an employee during the course of employment including transportation provided by the company for undertaking such visit. Company's Policy against sexual harassment includes sexual harassment by fellow employees, supervisors, managers as well as agents, contractors, customers, vendors, partners and, visitors including outsource employees. Any place visited by the employee arising out of or during the course of employment including transportation provided by the employer for undertaking such a journey.

Sexual harassment is judged by the impact on the complainant and not the intent of the Respondent. Sexual harassment as addressed in this Policy need not necessarily be from a male to a female employee, it can be vice versa as well as between individuals of same gender.

This Policy comes into force with immediate effect.

### III. DEFINITION

- a) **"Aggrieved Person"** means a person in relation to workplace whether employed or not, who alleges to have been subject to any act of sexual harassment by the Respondent.
- b) **"STL Networks Limited"** hereinafter referred to as "Company"/ "SNL" / "employer" shall mean and include **STL Networks Limited**, its affiliates and subsidiary companies.
- c) **"Employee"** means a person employed at a workplace for any work on regular, temporary, *ad hoc* or daily wages basis, either directly or through an agent, including a contractor, with or, without the knowledge of the principal employer, 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;
- d) **"Internal Committee"** means a committee constituted by Company as per this Policy.
- e) **"Respondent"** means a person against whom the Aggrieved Person has made a complaint.
- f) **"Sexual Harassment"** includes any one or more of the following unwelcome acts or behavior (whether directly or by implication) such as:
  - i. Physical contact and advances; or
  - ii. A demand or request for sexual favors; or

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- iii. Making sexually colored remarks; or
- iv. Showing pornography or other offensive or derogatory pictures, cartoons, representations, graphics, pamphlets or sayings; or
- v. Any other unwelcome physical, verbal or non - verbal conduct of sexual nature; or

Following circumstances amongst other circumstances mentioned above may constitute sexual harassment if it occurs or is present in relation or connected with any act or behavior of sexual harassment:

- i. implied or explicit promise of preferential treatment in their employment;
- ii. implied or explicit threat of detrimental treatment in their employment;
- iii. implied or explicit threat about their present or future employment status;
- iv. interfering with their work or creating an intimidating or offensive or hostile work environment; humiliation treatment likely to affect their health or safety.
- v. humiliating treatment likely to affect the health and safety of the aggrieved person.

In addition to the instances mentioned hereinabove, any other acts or behavior, which outrages the modesty of a female employee, will be considered as sexual harassment. An indicative list of behaviors that constitute sexual harassment is enclosed at **Annexure A**.

g) **“Workplace”** includes any department, organization, undertaking, establishment, enterprise institution, office or branch unit. Any place visited by the employee arising out of or during the course of employment including transportation provided by the employer for undertaking such journey.

h) **“Complainant”** shall mean and include the Aggrieved Person, or such other person as may be prescribed by the Internal Committee to may make a complaint on behalf of the Aggrieved Person.

#### IV. INTERNAL COMMITTEE

Every complaint received shall be forwarded to the Internal Committee formed under the Policy for redressal. The investigation shall be carried out by the Internal Committee constituted for this purpose. Internal Committee comprises of the following members as nominated by the Company:

- a. **A woman employee employed at a senior level amongst the employees shall act as Presiding officer of the committee.**
- b. **Not less than 2 members from amongst employees preferably committed to the cause of women OR who have had experience in social work**
- c. **One member who is from Legal background and who has good understanding of the Act**
- d. **One member shall be from amongst non-governmental organizations OR associations committed to the cause of women OR a person familiar with the issues relating to sexual harassment.**

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The Name of the Members of the Internal Committee is as per **Annexure B** of this Policy and any change in such composition shall be effected in the policy. At least half the total members of the Committee have to be women. **The Presiding Officer and every member shall hold office for such a period, not exceeding three years, from the date of their nomination as may be specified by the employer.**

#### V. COMPLAINT REDRESSAL MECHANISM

Aggrieved Person may make, in writing, a complaint of Sexual Harassment at Workplace to the Internal Committee giving details of the said Sexual Harassment meted out to her/him/they within a period of three (3) months from the date of incident and in case of a series of incidents, within a period of three (3) months from the date of last incident, which may be extended for a further period of three (3) months, if circumstances warrant such extension in the opinion of the Internal Committee.

The Complainant shall make a complaint to the Internal Committee through the following mode and manner:

1. Copy of complaint along with supporting documents and names and address of witness shall be sent to the Internal Committee at of respective locations as mentioned in **Annexure A**.
  - a. Where an aggrieved woman is unable to make a complaint on account of her physical incapacity, a complaint may be filed by- her relative or friend; or her co-worker; or an officer of the National Commission for Woman or State Women's Commission; or any person who has knowledge of the incident, with the written consent of the aggrieved woman;
  - b. Where an aggrieved woman is unable to make a complaint on account of her mental incapacity, a complaint may be filed by-her relative or friend; or a special educator; or a qualified psychiatrist or psychologist; or the guardian or authority under whose care she is receiving treatment or care; or any person who has knowledge of the incident jointly with her relative or friend or a special educator or qualified psychiatrist or psychologist, or guardian or authority under whose care she is receiving treatment or care;
  - c. Where the aggrieved woman for any other reason is unable to make a complaint, a complaint may be filed by any person who has knowledge of the incident, with her written consent;
  - d. Where the aggrieved woman is dead, a complaint may be filed by any person who has knowledge of the incident, with the written consent of her legal heir.

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On receipt of complaint, the Internal Committee shall decide the place and time for hearing the complaint and shall intimate the date, time and place of hearing to the Complainant and Respondent. The Internal Committee shall follow the principles of *Natural Justice* while handling such complaints.

The Internal Committee on receipt of such a written complaint may, if required, ask the Aggrieved Person to furnish additional details and information about the alleged harassment.

#### **Conciliation:**

The Internal Committee may before initiating an inquiry, and at the Aggrieved Person's request, attempt to settle the matter through conciliation. However, the Internal Committee shall ensure that:

- a. Monetary settlement will not be made as a basis of conciliation.
- b. Where a settlement has arrived, the settlement terms shall be signed by both the parties and shall be provided with a copy of it.

Where a settlement has arrived as mentioned hereinabove, no further enquiry shall be conducted by the Internal Committee.

#### **Inquiry:**

- a. In case where a settlement is not feasible or could not be arrived at through Conciliation, the Internal Committee will conduct an inquiry into the complaint. Additionally, an inquiry will also be initiated if the aggrieved woman informs the Internal Committee of any terms of settlement has not been complied with by the Respondent.
- b. On receipt of such a complaint, the Internal Committee shall provide a copy along with supporting documents of such complaints to the Respondent within seven (7) working days.
- c. The Respondent shall file its reply within ten (10) working days of receipt of the complaint along with list of documents, names and addresses of witnesses.
- d. The Internal Committee shall investigate in detail the matter of the complaint in accordance with principles of Natural Justice. The Internal Committee shall have the right to call the person against whom the complaint is made or any other witnesses as and when necessary.
- e. The Internal Committee shall have the right to terminate the enquiry or give *ex- parte* decision on the complaint, if the Respondent or Complainant remains absent for 3 consecutive hearings, without sufficient cause.
- f. Where both the Respondent & Complainant are Employees, both shall during the course of inquiry, be given an opportunity of being heard and a copy of the findings shall be available to both enabling them to make respective representations against the finding before the Internal Committee.

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- g. The Internal Committee must complete its investigation within a period of **90** days.
- h. The parties shall not be allowed to bring any legal practitioner to represent them in their case at any stage of the proceedings before the Internal Committee.

For conducting the inquiry, the quorum of the Internal Committee shall be comprising of **3** members including the presiding officer. The Internal Committee may during such investigation exercise the power of a civil court, vested in it, in respect of:

- a. summoning and enforcing the attendance of any person and examining him under oath;
- b. requiring discovery and production of documents and;
- c. any other prescribed matter.

During such inquiry, upon written request by the Aggrieved Person, the Internal Committee may at its discretion recommend:

- a. to transfer the Aggrieved Person or the Respondent to any other workplace;
- b. grant leave to the Aggrieved Person of up to three (3) months which is in addition to leave to which she / he is otherwise entitled to.

## VI. ACTION

1. The Internal Committee shall on completion of the enquiry provide a report of its findings within **10 days** from the date of completion of the enquiry and such report shall be made available to the parties concerned.
2. If the allegation against the respondent has not been proved, the Internal Committee may recommend that no action needs to be taken on the matter.
3. If the Internal Committee arrives at the conclusion that the allegation against the Respondent has been proved, it shall recommend to:
  - a. Take action for sexual harassment as a misconduct.
  - b. To tender written apology to the Complainant, issue warning, withholding of promotions / increments of the Respondent, terminating the Respondent.
  - c. To deduct from salary / wages of the respondent or issue direction for payment; such sum as it may consider appropriate to be paid to the aggrieved person or to their legal heirs, as it may determine.
4. Such action will be taken within 60 days of the receipt of report.

## VII. AWARENESS

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1. All employees at the Company have a responsibility in contributing to a mature and respectful work environment. All employees are personally responsible for their actions and must ensure that their behavior does not constitute sexual harassment whether it happens deliberately or inadvertently.
2. All the Company employees, agents, customers, vendors, partners and visitors shall have access to this Policy at any given point of time and clarification related to this Policy shall be addressed by the HR and Legal team.
3. A brief shall be given to all existing employees regarding the features of this Policy immediately on formulation of the Policy and to new employees in the Company during their initial Induction.
4. The Company shall comply with all other details as set out under **Section 19 of the Act** to ensure that all employees are provided with the safe working environment at the workplace.
5. Company shall display the notice showing the name of the Internal Committee members at its every establishment at a conspicuous place.

#### VIII. FALSE ACCUSATIONS

1. The complaint of sexual harassment made by any employee shall be taken up with utmost seriousness by Company. However, there shall be zero tolerance for any false accusation.
2. If the Internal Committee comes to a conclusion that the allegation was made with malicious intent or the aggrieved person or any other person making the complaint on behalf of the aggrieved person produced false or forged or misleading documents to prove his/her case, the Internal Committee may recommend action to be taken against the person who has made the complaint, including termination of service.  
  
In such a case, malicious intent has to be established after an inquiry, before any action is recommended. A mere inability to substantiate a complaint or provide adequate proof would not attract action as provided herein.
3. A similar recommendation for taking action would be recommended against any witness whom the Internal Committee concludes, that he/she has given false evidence or produced forged or misleading documents.
4. It is to be noted that this statement is not intended to discourage employees from coming forward with any complaints. The Company recognizes and expects that some claims may be difficult to prove or support, or may not in fact be found to raise to the level of seriousness deemed necessary to constitute Sexual Harassment. These types of complaints will not be considered to be false

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accusations.

## IX. CONFIDENTIALITY

All incidents/grievances reported will be treated seriously, sensitively and with utmost confidentiality as is practically possible. Contents of the complaint, the identity and addresses of the Complainant, Respondent and witnesses, any information relating to conciliation and inquiry proceedings, recommendations of the IC and the action taken by the Company shall be treated as confidential. However, it is clarified that information regarding the justice secured to any victim of sexual harassment may be disseminated without disclosing the name, address, identity or any other particulars, which can lead to identification of aggrieved woman and witnesses.

If any person entrusted with the duty to handle the complaint, inquiry or any recommendations of the Internal Committee contravenes his/her confidentiality obligation, he/she shall be liable to disciplinary action, in accordance with the provisions of the Company policies, as applicable.

Any person who breaches the duty of confidentiality as prescribed under this section shall be liable for a penalty of INR 5000 and / or further disciplinary action as deemed fit by IC.

## X. MISCELLANEOUS

1. Company may make any alteration or amendment or rescind any of the clauses of this Policy as and when it finds it necessary to do so as long as it complies with the Act. Any such alterations or amendments or rescinding will be intimated to the employee.

2. Nothing contained in these rules shall operate in derogation of any law for the time being in force or to the prejudice of any right of any employee under any other Rules or Law.

3. The Internal Committee shall prepare an annual report with the following details and shall submit the same to the Company to include in its Annual report:

- a. Number of complaints of sexual harassment received during the year;
- b. Number of complaints disposed off during the year;
- c. The number of cases pending for more than 90 days;
- d. Number of workshops or awareness program against sexual harassment carried out;
- e. Nature of action taken by the employer

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## XI. CONCLUSION

Complaints relating to Sexual Harassment shall be handled and investigations will be conducted under the principles of natural justice, basis of fundamental fairness, in an impartial and confidential manner so as to protect the identity of all viz., the person bringing the charge, potential witnesses, and the person accused of improper behavior.

Also, all efforts shall be made to ensure objectivity and thoroughness throughout the process of investigation.

The decision of Company shall be final and binding on all. However, the same is without prejudice to any recourse that the Company or the individual concerned may have against the respondent and it shall not limit or restrict the rights of the Complainant and/or Company to pursue, nor shall they be precluded from pursuing, such further and other legal actions as may be available.

Please contact Ms. Vibhuti Kagdiyal (vibhuti.kagdiyal@inveniatech.com) for any questions or further guidance in relation to this Policy.

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## ANNEXURE - A

### Sexual harassment may include:

- Using sexually abusive and offensive language or comments that put down people because of their sex or sexual orientation or appearance;
- Phone calls or messages on electronic mail or computer networks which are threatening, abusive or offensive to employees in a sexual manner;
- Sexual messages, text, or images which may be perceived by the recipient as creating a hostile work environment;
- Suggesting or insisting that someone wear revealing clothing;
- Intrusive questions about sexual activity, Tales of sexual exploits, Comments about people's (women/men) bodies or intruding on the privacy of an employee;
- Repeated requests for sexual favors, sexual advances or repeated pressure for dates and social contact especially when person invited has refused/ignored similar invitations;
- Sexually suggestive comments, sexually colored propositions, insults or threats;
- Telling lewd jokes about sex or sexual orientation;
- Offensive language that insults/demeans including using terms of endearment; and
- Singing or humming vulgar songs, ballads or words.
- Graphic descriptions of pornography including graffiti in the office premises;
- Displaying of books, photographs, paintings, films, pamphlets, packages, etc. containing 'indecent representation of women/men',
- Material that is sexual in nature, sexist, sexually explicit is displayed in the workplace, circulated, or put in someone's workplace or belongings, or on a computer or fax machine or on the internet or any other public display system or public in the work premises;
- Offensive gestures, staring, leering or whistling with the intention to insult or discomfort another;
- Even if not directly done to a particular individual, uttering a word, making a gesture or exhibiting any object with the intention that such word, gesture, or object be heard or seen by an employee;
- Sounds, gestures or display of offensive books, pictures, cartoons, magazines, calendars; or derogatory written materials at one's desk or workplace;
- Viewing, showing or mailing pornographic posters, Internet sites, cartoons, drawings; and
- Suggestive letters, phone calls, electronic instant messaging or e-mail messages.
- Intentional touching of the body, example- Unwelcome hugs, kisses, brushing, fondling, pinching, patting etc.
- "Accidentally" brushing sexual parts of the body,
- Any displays of affection which can make others uncomfortable or are inappropriate at the workplace even if the recipient welcomes it.
- Indecent exposure or coerced sexual intercourse.
- Use of technology to induce different remote sensations on the body including, but not limited to pain and sexual stimulation,
- Sexual assault or using criminal force to any woman, intending to outrage or knowing it to be likely that he will thereby outrage her modesty

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## ANNEXURE – B

Panel of External Members		
Name	Locations	Email Id
Dr. Surabhi Dhingra	a. Gurgaon b. Chennai c. Mumbai d. Pune e. Bhopal f. Jammu g. Bangalore h. Hyderabad i. Other project Office	<a href="mailto:surabhi@poshca.in">surabhi@poshca.in</a>

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**ANNEXURE – B**

INTERNAL COMMITTEE MEMBERS for STL Networks Ltd.

**Date of Appointment: 01.04.2025**

Sr. No.	Name	Email ID	Role	Location
1	Vibhuti Kagdiyal	vibhuti.kagdiyal@inveniatech.com	Presiding Member	a. Gurgaon b. Chennai c. Mumbai d. Pune e. Bhopal f. Jammu g. Bangalore h. Hyderabad i. Any other project office
2	Ruchika Arora	ruchika.arora@inveniatech.com	Member	
3	Navneet Kaushik	navneet.kaushik@inveniatech.com	Member	
4	Gopal Rastogi	gopal.rastogi@inveniatech.com	Member	

	
NAVNEET KAUSHIK	
Authorized Signatory	
Date: 1 <sup>st</sup> April 2025	

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