



Anti-Harassment and Anti-Discrimination Policy

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1. PURPOSE

The objective of this policy is to foster a safe, respectful, and inclusive workplace for all employees by preventing harassment and discrimination in any form. It reflects the company's commitment to ensuring that everyone is treated with dignity and respect.

2. SCOPE

This policy applies to all employees, contractors, interns, and third parties associated with the company, regardless of position or location. It covers all forms of harassment (Including sexual harassment) and discrimination, including those occurring:

- In the workplace
- During work-related events
- Through virtual communication channels

3. DEFINITIONS

1. Harassment

Harassment includes unwelcome conduct that demeans, humiliates, or embarrasses an individual.

Examples include:

- Verbal abuse, derogatory comments, or slurs
- Unwanted physical contact or gestures
- Any form of sexual harassment
- Display of offensive materials, jokes, or inappropriate emails
- Intimidation or threats

2. Discrimination

Discrimination refers to unfair or unequal treatment of an individual based on personal characteristics, such as race, gender, age, religion, disability, sexual orientation, nationality, or any other protected trait. Examples include:

- Denying opportunities based on personal attributes
- Unequal pay or benefits like promotions, bonus, recognition etc.
- Exclusion from projects or roles

4. Responsibilities

- Employee Responsibilities
 - Treat all colleagues with respect and professionalism.

- Report incidents of harassment or discrimination promptly.
- Cooperate fully during investigations.
- Manager Responsibilities
 - Ensure all team members understand and comply with this policy.
 - Address complaints promptly, confidentially, and impartially.
 - Foster an inclusive and supportive team culture.

5. CLAUSES COVERED UNDER POLICY

- Zero Tolerance
The company strictly enforces a zero-tolerance policy toward harassment and discrimination. Any misconduct will result in disciplinary action, up to and including termination.

5.1 Reporting and Complaint Procedure

- Employees who experience or witness harassment or discrimination are encouraged to report the incident to the Internal Committee (IC) via the anonymous reporting channel.
- All complaints will be taken seriously and investigated thoroughly.
- Retaliation against individuals who report or participate in the investigation of a complaint is strictly prohibited.

5.2 Investigation Process

- Acknowledgment: Complaints will be acknowledged within 48 hours.
- Impartial Investigation: A neutral party will lead the investigation to ensure objectivity.
- Confidentiality: While maintaining confidentiality to the extent possible, relevant information may need to be shared with involved parties to ensure a thorough investigation. All parties are expected to handle the matter with discretion.
- Outcome and Action: Upon conclusion of the investigation, appropriate corrective actions will be taken, and the involved parties will be informed of the outcome.
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5.3 Resolution

- The Internal committee is required to send the complaint copy to respondent within seven days of receiving the complaint, and within 10 days respondent is required to respond to the complaint.
- The inquiry is completed within 90 days of the filing of the complaint, and within ten days of the inquiry completion, IC will send its recommendations to the Employer and Employer will implement the recommendations of IC within 60 days.

5.4 Training and Awareness

- All employees will undergo mandatory training on anti-harassment and anti-discrimination policies during onboarding and periodically thereafter.
- Managers will receive additional training to recognize and address potential issues proactively.
- Conduct periodic POSH refresher trainings.

5.5 Consequences of Policy Violation

- Violations of this policy may result in disciplinary action, including but not limited to:
 - Verbal or written warnings
 - Suspension or demotion
 - Termination of employment
- Severe violations may lead to legal action, depending on the circumstances.

6.0 Policy Review

This policy will be reviewed annually to ensure it remains effective and compliant with current laws and best practices.

7.0 Conclusion

The company is committed to maintaining a workplace free from harassment and discrimination. All employees share the responsibility of contributing to a positive, inclusive, and respectful work environment.