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Introduction

Delhivery is committed to creating and maintaining a community in which all its employees can work together in an environment free of violence, harassment, exploitation, intimidation and stress. Every person associated with the company should be aware that while the Company is committed to upholding the right to freedom of speech and expression and association, it strongly supports gender equality and opposes all forms of gender discrimination violence and sexual harassment.

1. Definition

- A. **“Act”** means the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, as amended from time to time, and includes the rules framed thereunder.
- B. **“Internal Committee”** means a forum constituted with a minimum of 5 (Five) persons who will investigate into complaints of alleged Sexual Harassment and make recommendations for resolution of the same to the Competent Authority.
- C. **“Competent Authority”** means the board of directors or the senior management of the Company.
- D. **“Employee”** means any person employed on the payrolls of Delhivery to whom this Policy shall be applicable, and shall include any temporary, part-time or honorary employee, probationers, trainees, apprentices, by whatever name called, whether employed for remuneration or not, or working on a voluntary basis or otherwise, and would include persons engaged through a contractor or an agent, with or without the knowledge of the principal employer.
- E. **“Presiding Officer”** means the Presiding Officer of the Internal Committee.
- F. **Third Party** means any person or persons not on the pay-rolls of Delhivery, but, in the course of its work-related activities, interacting with the Employees of Delhivery.
- G. **“Workplace”** means the offices or branches of Delhivery, and any other place visited by an Employee arising out of or during his / her employment, including the transportation provided by the employer for undertaking such journey.
- H. **“Sexual Harassment”** shall include, in connection with an Employee or any Third Party, during the course of his / her activities at the Workplace any one or more of the following

Unwelcome acts or behavior directly or by implication, such as –

- physical contact and advances;
- a demand or request for sexual favors;
- making sexually colored remarks;
- showing pornography;
- any other unwelcome physical, verbal or non-verbal conduct of sexual nature.

- Sexually tainted comments, remarks or jokes, through letters, phone calls, emails or any other mode of communication.
- Lurid stares, physical contact or molestation, stalking, sounds or display of derogatory nature, with the purpose of, or having the effect of interfering with an individual's performance or creating an intimidating, hostile or offensive environment.
- Eve-teasing, innuendos, taunts, physical confinement against one's will and /or any other act to impinge upon one's privacy.
- Any act or conduct by a person in authority which denies or would have the effect of denying equal opportunity to a person, in the pursuit of employment or career development, or otherwise giving rise to an intimidating and hostile environment at the workplace.
- The Act further provides that the following circumstances, among other circumstances, if it occurs or is present in relation to or connected with any act or behavior of sexual harassment, may amount to Sexual Harassment:
 - Any implied or explicit promise of preferential treatment in relation to a person's employment;
 - Any implied or explicit threat of detrimental treatment in relation to a person's employment;
 - Any implied or explicit threat about a person's present or future employment status;
 - Any interference with a person's work or creating an intimidating, offensive or hostile work environment;
 - Any humiliating treatment likely to affect a person's health or Safety.

2. Objective and Commitment

The policy has been framed keeping in mind the following objectives in view:

- A. To fulfill the provisions contained in the Act and the directives issued by the Hon'ble Supreme Court of India, enjoining all employers to develop and implement a policy against Sexual Harassment at the Workplace.
- B. To evolve a permanent mechanism for the prevention and redressal of cases involving Sexual Harassment and other acts of gender-based violence at the Workplace.
- C. To ensure the implementation of the Policy, in letter and in spirit, through proper reporting mechanisms for complaints and their follow-up procedures.
- D. To promote a social and psychological environment which will raise awareness about Sexual Harassment in its various forms.
- E. To generate public opinion against Sexual Harassment and all other forms of gender-based violence at the Workplace.
- F. To ensure that Delhivery upholds its commitment to ensuring an environment free of gender bias and / or gender -based discrimination at the Workplace.

3. Scope

This Policy is applicable to all allegations of Sexual Harassment made by an employee of Delhivery Limited or its associate/subsidiary companies, or a Third Party, alleged to have taken place at the Workplace.

4. Constitution of the Internal Committee

The Internal Committee shall be constituted as follows, with at least 50% (Fifty percent) of its members being women:

- A. Presiding Officer being a woman employed at a senior level at the Workplace;
- B. Members from amongst the Employees having experience in the field of social work or having legal knowledge;
- C. An external member nominated by the Company from amongst associations committed to the cause of women or a person familiar with the issues relating to allegations of Sexual Harassment.
- D. The term of office of the Presiding officer and the other members of the Internal Committee shall not exceed 3 (Three) years from the date of their nomination. The Internal Committee shall be deemed to be an inquiry authority for the purpose of service regulations and the report formulated by the same shall be deemed to be an inquiry report for disciplinary purposes.

5. Procedure for Registering Complaints

All complaints must be made by the complainant, in person, in writing, to any member of the Internal Committee, except circumstances in which the aggrieved person is unable to make a complaint on account of physical or mental incapacity, death or forced confinement. In such cases the complaint can be made by a legal heir or any another person on behalf of the complainant. In exceptional cases, third party / witness complaints may also be entertained. Pursuant to such complaint, the Internal Committee will ascertain whether the person alleged to have been harassed wishes to lodge a formal complaint and further examine whether an investigation, intervention or some other assistance is mandated. The complainant can be accompanied by a representative, if desired by the complainant.

Complaints can be sent to posh@delhivery.com

Complainant can also call on the **POSH Helpline: 0124- 6719601** to speak to any Internal committee member if they have any concerns or queries.

6. Inquiry Procedure

A suggested inquiry procedure would be as follows: -

- A. An aggrieved person, or any one on their behalf (as set forth in paragraph 5 above) may register a complaint of Sexual Harassment with the Presiding Officer or, at their choice, with any of the other members of the Internal Committee. They should do so at the earliest point of time, but not later than 3 (Three) months from the date of occurrence of the alleged incident or in the case of a series of incidents, within a period of 3 (Three) months from the date of the last incident of Sexual Harassment. However, the Internal Committee may, for reasons to be recorded in writing, condone the delay in filing the complaint, for a further period not exceeding 3 (Three) months.
- B. Inquiry shall be completed within 90 days of receiving a complaint.
- C. The complaint will need to be made in writing. In the event the complaint is made orally, the complainant will be requested to confirm the complaint in writing.
- D. The Internal Committee, or a minimum of 3 (three) members of the Committee (the Presiding Officer, at least one member from amongst the employees and one member from amongst

external members), will meet with the complainant within a period of 30 (Thirty) days from the date of receipt of the complaint.

- E. At the first meeting, the complainant will be heard, and her/his statements will be recorded. The complainant will be asked to produce any corroborative material that can substantiate the complaint.
- F. The Internal Committee will record the proceedings of the inquiry, and the attendance of the parties present at said meeting.
- G. Thereafter, the respondent will be summoned for a meeting with the Internal Committee. The communication to the respondent will need to mention the fact that a complaint has been registered against him/her. During the meeting, the complaint will be narrated to the respondent in detail, and the respondent will be given the opportunity to be heard.
- H. The Internal Committee provide the respondent with an opportunity to submit a written response, should he/she so desire, within 15 (Fifteen) days of receipt of the statement.
- I. If the complainant or the respondent wishes to call upon any witness(es), they must write to the Internal Committee with the names and contact details of the same, after which the Presiding Officer will summon the said witness(es).
- J. If the complainant wishes to provide any documentary evidence, he/she must supply to the Internal Committee. Similarly, if the respondent wishes to tender any documentary evidence, he/she will be requested to provide the same to the Internal Committee.
- K. After having heard both the parties, the Internal Committee will examine the evidence provided by both parties. The inquiry may include meetings with witnesses, consultation with experts and any other activities required to establish a balanced view of the case.
- L. The Internal Committee will provide every reasonable opportunity to the complainant and to the respondent to defend their respective cases.
- M. The Internal Committee will complete the inquiry as soon as is reasonably possible and submit the inquiry report with its recommendations within 10 (ten) days of the closure of the inquiry. The Competent Authority shall take action within 60 (Sixty) days from the date of receipt of the inquiry report.
- N. In case the complaint registered by the Complainant is found to be frivolous or false, the complainant will be held liable for punishment.
- O. During the pendency of an inquiry, an aggrieved person may, upon a written request to the Internal Committee, seek –
 - a. transfer to another Workplace; or
 - b. grant of leave for a period of up to 3 (Three) months.
 - c. The Internal Committee may also restrain the alleged offender from reporting on the work performance of the complainant, or formulating the confidential report, in any manner.
- P. The entire set of proceedings, documents and details of the parties to proceedings under this Policy shall be treated with strict confidentiality and shall not be disclosed to any person/ third party who do not have the need to know, published, communicated or made known to the public, press or media, in any manner whatsoever. The Company and the Competent Authority shall ensure that such confidential information is duly protected. Any person found in breach, shall be subjected to disciplinary action by the Company. Provided however that, information

may be disseminated by the Company, regarding the justice secured to any victim of sexual harassment under this Policy without disclosing the name, address, identity or any other particulars of the parties concerned.

- Q. Any person aggrieved by the recommendations of the Internal Committee, or the non-implementation of its recommendations, may prefer an appeal to the competent court or tribunal within a period of ninety (90) days from the date of such recommendations.

7. Redressal

The complaints may be addressed as follows: -

- A. Internal Committee can recommend the Company to suspend the alleged harasser from an assignment if his / her presence is likely to interfere with the inquiry.
- B. The Company upon receipt of an inquiry report, pursuant to Paragraph 6, shall institute disciplinary action against the offender, in accordance with the relevant service regulations applicable to offender.
- C. The Company, may also, deduct from the salary or wages payable to the offender, such sums as it may deem appropriate to be paid to the aggrieved person or their legal heirs, as the case may be.
- D. The disciplinary action will be commensurate with the nature of the offence committed, and may be in the form of:
 - a. Warning;
 - b. Written apology;
 - c. Debarring from supervisory duties;
 - d. Denial of re-employment;
 - e. Stoppage of increments / promotion;
 - f. Suspension; and / or
 - g. Any other relevant mechanism, as appropriate, in accordance with the applicable service regulations.

8. Conciliation

At the request of the aggrieved person, the Internal Committee may attempt to settle the complaints between the concerned parties through conciliation:

- A. Where a settlement has been arrived at under paragraph (i), the Internal Committee shall record the terms of the settlement and forward the same to the Competent Authority to take appropriate action as specified in the recommendation.
- B. The Internal Committee shall provide the copies of the settlement as recorded under sub-paragraph (i) to the concerned parties.
- C. Where a settlement is arrived at under sub paragraph (i), no further inquiry or action shall be conducted by the Internal Committee.

No monetary settlement shall be made a basis of a conciliation pursuant to Paragraph 8.

9. Consequences of false complaint and evidence

Where the Internal Committee arrives at a conclusion that the allegation against the alleged offender is malicious or the complainant has made the complaint knowing it to be false, or produced any forged or misleading document, the Internal Committee may recommend the Company / Competent Authority:

- A. To act against the complainant in accordance with the provisions of the service regulations applicable to the complainant as mentioned in the appointment letter.
- B. Where no such service regulations exist, then to take such action including a written apology, warning, reprimand or censure, withholding of promotion, withholding of pay rise or increments, termination of service or undergoing a counselling session or carrying out community service.

10. Protection against Victimization

Delhivery has an obligation to ensure that a person who registers a complaint in good faith and without malice is protected and will not allow a person raising a concern to be victimized for doing so. In the unfortunate event where, despite the best of precautions, the complainant is victimized, Delhivery shall treat this as a serious matter and take appropriate disciplinary action against the perpetrator.

11. Responsibility and Authority - Powers and Functions of the Internal Committee***Preventive Steps***

It will be the endeavor of the Internal Committee:

- i. To facilitate a safe environment that is free of acts of Sexual Harassment;
- ii. To promote an atmosphere that ensures gender equality and equal opportunities, the Company shall take steps such as conducting sensitization workshops and awareness programs at regular intervals and monitor the timely submission of the reports.

Remedial Steps

- i. To ensure that the mechanism for registering complaints is safe, accessible and sensitive.
- ii. To take cognizance of complaints about Sexual Harassment, conduct enquiries, provide assistance and redressal to the victims, recommend penalties and take action against the alleged offender, if necessary.
- iii. To advise the Competent Authority to issue warnings to prevent the alleged offender, if the complainant consents.
- iv. To seek medical, police and legal intervention with the consent of the complainant.
- v. To make arrangements for appropriate psychological, emotional and physical support (in form of counselling, security and other assistance) to the victim, if so desired.

Members of the Internal Committee:

S.No.	Name	Designation
1	Kavya Shetty	Presiding Officer
2	Vinayana Talwar	Member
3	Suraju Dutta	Member
4	Kshitij Chopra	Member
5	Manzil Bhattacharya	Member
6	Abhishek Vanam	Member
7	Digvijay Singh Sujlana	Member
8	Suhani Singh	Member
9	Pratiksha Lathwal	Member
10	Amol Mamidwar	Member
11	Amit Kumar	Member
12	Ayush Dwivedi	Member
13	Hanna Malini Rajan	Member
14	Padarbinda Sabata	Member
15	Reema Dhaka	Member
16	Khalid Mustafa	Member
17	Ashwini Vittalachar	External Member

In line with the above, the employer has constituted the above Internal committee for a period of 3 (three) years. On the basis of availability, any 5 (Five) of the above members must attend the meetings of the Internal Committee. In case of any vacancy, the employer is authorized to fill the vacancy, in line with the basic eligibility requirements stipulated in the Act and in Paragraph 4 above.

To demonstrate compliance with the Policy, the Company must maintain the following documents at all times:

- i. Copies of all complaints received by the Internal Committee;
- ii. Attendance records of the members of the Internal Committee ;
- iii. Copies of all documents/ material used as evidence, while conducting investigations of the complaint;
- iv. The sequence of events, signed by all the members of the Internal Committee, which have transpired during meetings of the Internal Committee; and
- v. Any other document/ evidence/ complaint/ decision related to the complaint

12. Amendment

No amendment to this Policy can be carried out except with written approval of the Competent Authority