



# **AXA GLOBAL BUSINESS SERVICES PVT. LTD.**

## **PREVENTION OF SEXUAL HARASSMENT POLICY**

### **1. Introduction**

At AXA Global Business Services Private Limited (AXA GBS), we are committed to providing a work environment where everyone belongs, and where differences are valued and thrive. Harassment has no place in an inclusive culture, and we do not tolerate it. We expect all our employees to show respect towards their colleagues, customers, and partners. In addition, any harassment of our employees by a third party will not be tolerated.

The objective of this policy is to outline our commitment to prohibiting harassment in the workplace. This policy is in line with the requirements of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act of 2013- the POSH Act as well as AXA Group's policy on workplace anti- harassment.

Harassment can occur in many workplace environments or situations including, but not limited to; something someone says or does (or does not say or do), whether in person or remotely, through an email, letter or document, a posting on the internet or intranet (for example, on LinkedIn, Twitter or on a blog), a message or an image sent by instant messenger applications (for example, on Microsoft Teams or WhatsApp) or a physical gesture. It is possible for harassment to take place while employees are attending business-related events, during or outside of normal working hours, including social events, or while traveling for business or working from home. Workplace will include situations where employees are working from home or working from any remote location that is not AXA GBS's premises, or our clients'/ vendors' premises or any other location where AXA GBS employees are ordinarily required to perform their work.

For the purpose of this policy, "Workplace" shall mean establishments, offices, premises, locations or units established, owned, controlled by AXA GBS or places visited by the employees out of or during the course of employment, including but not limited to accommodation, transportation provided by AXA GBS for undertaking such journey to any location in connection with the establishment for which the employee is engaged and shall include, dwelling place, hostels, home, co-sharing spaces, common areas, virtual rooms, etc.

### **2. Purpose**

- A. Provide protection and prevention against sexual harassment of AXA GBS employees at workplace and
- B. Provide transparent, unbiased, free, and fair redressal of complaints of harassments and matters connected therewith or incidental thereto.

### **3. Applicability and Scope**

This policy applies to all our AXA GBS employees, interns, consultants, and independent contractors (including staff employed through them at AXA GBS). The scope of this policy also extends to harassment by or harassment of applicants for employment, suppliers, customers and other third parties with whom AXA GBS does business or seek to do business.

Third party harassment means Harassment perpetrated by visitors, patrons, vendors, independent contractors, auditors, consultants, and others with whom our Employees have come in contact, directly or indirectly, because of a business relationship that AXA GBS has with them.

Where the harassment at the Workplace occurs because of an act or omission by any third party, AXA GBS shall take all steps necessary and reasonable to assist the affected employee in terms of support and preventive action.



#### 4. Prohibition of Harassment

The Prevention of Sexual Harassment Policy prohibits sexual harassment at workplace.

#### 5. Sexual Harassment

***'Sexual harassment' includes unwanted sexual behavior or advances, requests for sexual favors or unwanted verbal, written or physical behavior of a sexual nature.***

Sexual harassment also includes harassment based on sex, sexual orientation, self-identified or perceived sex, gender expression, gender identity and the status of being transgender.

Non-exhaustive examples of those type of behaviors are the following:

- a. Display or distribution of materials that are sexually suggestive, sexually demeaning or pornographic.
- b. Unwelcome comments or jokes, or the use of foul or obscene language of a sexual nature or regarding another's body, appearance, sexuality, sex life, gender identity, gender expression, or sexual orientation or transgender status.
- c. Propositions or other unwelcome or offensive flirtation, requests for sexual favors or repeated unwanted requests for dates.
- d. Sexual gestures or physical behavior including touching, grabbing, kissing, massaging, intentional pushing or brushing up against another employee.
- e. Demand or request for sexual favors.
- f. Any other unwelcome physical, verbal, or non-verbal conduct of sexual nature.

Additionally, acts that are committed during **Work from Home arrangements** that are authorized and/ or mandated by AXA GBS would fall within the ambit of sexual harassment at the workplace. "Work from Home" here refers to a situation wherein employees are working from a remote location which is not AXA GBS' s physical premises, client/ vendor premises, or any other location. Actions, which take place in personal capacity, will not be considered workplace concerns unless there is connection with the workplace by way of creation of a hostile work environment for the aggrieved person.

#### 6. Reporting & Investigation of

##### **Sexual Harassment Complaints**

**"Complainant"** under this category, in relation to a Workplace (as defined earlier) means an aggrieved person, of any age whether employed or not, who alleges to have been subjected to any act of sexual harassment by the Respondent.

The Complainant may make, in writing, a complaint of sexual harassment at workplace, to the Internal Committee (IC) within a period of three months from the date of incident and in case of a series of incidents, within a period of three months from the date of last incident.

The Internal Committee can extend the time limit, not exceeding 3 months, if it is satisfied that the circumstances were such, which prevented the work person from filing a complaint within the said period.

Such complaints can be sent to any member of the Internal Committee by way of e-mail to [Complaintscommittee@axa.com](mailto:Complaintscommittee@axa.com), registered or ordinary mail, courier, personal delivery. They can also be contacted at their desk phone or mobile phones displayed on the notice board. Any oral communication must be followed up with written communication. The complaint can also be sent to [speak.up@axa.com](mailto:speak.up@axa.com), which would then be routed to Internal Committee for further investigation.



AXA GBS has constituted **Internal committee** to receive, investigate and redress complaints on sexual harassment at workplace as per the requirements of the POSH Act of 2013. All the sexual harassment complaints would be investigated as per the Internal Committee procedures.

If a concern is not raised in good faith or false or malicious information is provided, the relevant complainant, or those providing false or malicious information, may be subject to disciplinary action.

## **7. Penalties and disciplinary action**

- a. Based on the gravity of misconduct of which the concerned work person has been found guilty, disciplinary action would be taken in accordance with the Company policies (including a review and final decision by the Disciplinary Committee where needed) and applicable regulations including, but not limited to termination of employment.
- b. Every work person who lodges a false complaint shall be liable for disciplinary action, up to and including termination of employment as per the rules of the Company.
- c. Every work person who threatens or intimidates (a) any work person who has made a complaint under this policy or (b) any witness thereof, and/ or in any other manner interferes with the implementation of this policy shall be liable for disciplinary action, up to and including termination of employment as per the rules of the Company.

AXA GBS may discipline an employee for any inappropriate behavior (as defined in this policy) discovered in investigations made under this policy, regardless of whether the behavior amounts to a violation of law. If the person who engaged in behavior in violation of this policy is not an employee, then AXA GBS will take whatever corrective action is possible and appropriate under the circumstances.

## **8. Leader and Employee Responsibilities**

### **Leader Responsibilities**

Our AXA GBS leadership team plays a very important role in ensuring that the organization maintains a safe and respectful environment free from harassment and other inappropriate behavior. AXA GBS expects our leaders to be the example to follow for all employees. AXA GBS leaders have a responsibility to take appropriate action if they witness or become aware of inappropriate behaviors, harassment, or retaliation and to actively encourage their teams to do the same.

### **Employee Responsibilities**

Everyone has a part to play in creating an inclusive culture. AXA GBS expects every employee, regardless of level or role, to treat each other, and others they interact with, in work-related environments— whether in person or online— with respect and professional courtesy. Here, we want our employees at every level to speak-up if they experience or witness any inappropriate behaviors. Speaking up shows that we care about each other and our business. We also encourage employees to participate in training(s) that we offer to familiarize employees on what is required, and how the organization will support them.

## **9. Employee Wellbeing Support**

Employee wellbeing is AXA GBS' priority. Employees will be asked whether they require support during and after the period of investigation by Human Resources and given information about any other relevant persons or services that are available to support them.



## **10. Confidentiality**

AXA GBS is committed to maintaining confidentiality in relation to investigations. AXA GBS will take all reasonable measures to ensure that details are disclosed only to those who need to know. Any employee found to have disclosed information about an investigation may be subject to disciplinary action.

## **11. Non-retaliation**

AXA GBS does not tolerate retaliation against anyone who speaks up. Retaliation means any kind of unfair treatment, whether subtle or overt towards a person who raises a concern or who participates in the investigation. All our employees who experience or witness any behavior they believe to be retaliatory should immediately report such behavior to their Line Manager, Human Resources representative, [speak-up@axa.com](mailto:speak-up@axa.com) or to the Head of Audit for AXA GBS. A person who is found to have retaliated against someone who raises a concern will be subject to disciplinary action.

## **12. Evolving Risks**

AXA GBS recognizes that risks change, and to appropriately respond to new and evolving risks, this policy will be reviewed and updated at least on an annual basis.