## PREVENTION OF SEXUAL HARASSMENT POLICY

**INTRODUCTION:** LeadSquared is committed to providing a safe and discrimination-free workplace, with a zero-tolerance policy for sexual harassment. The LeadSquared policy on prevention of sexual harassment of women is available to all employees through the HRMS portal, DarwinBox. It covers all employees and defines sexual harassment as any unwelcome behaviour of a sexual nature. It applies to various work-related contexts, including interactions with clients.

**PURPOSE:** The LeadSquared policy on prevention of sexual harassment of women aims to protect individuals from unwanted advances and provide guidelines for reporting incidents. LeadSquared emphasizes mutual respect, collaboration, and takes all complaints seriously and promptly. Disciplinary action will be taken against offenders.

**SCOPE:** The LeadSquared policy on prevention of sexual harassment of women applies to all individuals at LeadSquared, regardless of gender, sexual orientation, or other protected characteristics. It covers employees, contractors, customers, and visitors. Complaints will be treated promptly, seriously, and confidentially, with no disadvantage to the employee.

**POLICY ELEMENTS:** The LeadSquared policy on prevention of sexual harassment of women defines sexual harassment as unwelcome conduct that offends, humiliates, or intimidates a person. It includes physical, verbal, and non-verbal actions. The Act recognizes the right to a safe workplace for all women, whether their employment is regular, temporary, or ad hoc.

What is a Workplace? The policy defines a workplace as any place visited by an employee during the course of employment, including co-working spaces and virtual workspaces.

What is Sexual Harassment at the Workplace? Sexual harassment includes physical contact or advances, demands for sexual favors, sexually colored remarks, showing pornography, and other unwelcome conduct of a sexual nature. The fact that impact of behavior matters more than the intent, and that it often occurs in a power dynamic is reflected in the LeadSquared policy on prevention of sexual harassment of women.

**PREVENTION & PROHIBITION:** LeadSquared takes a strong stand against sexual harassment and considers no form of harassment too minor to be addressed. It emphasizes the importance of how others feel and encourages employees to stop behaviors that make colleagues uncomfortable. The policy assumes every sexual harassment claim is legitimate unless proven otherwise.

WHAT TO DO IF YOU ARE BEING OR HAVE BEEN SEXUALLY HARASSED: Employees who experience sexual harassment are encouraged to immediately inform IC. LeadSquared has set up an Internal Committee (IC) for each office to address complaints and provide necessary support.

Each committee is comprised of 5 members of which minimum 3 are female. The presiding officer of the committee is the senior most female employee of the LeadSquared. The IC also has an external member who is not an employee by LeadSquared. The IC may be reached at <a href="mailto:posh@LeadSquared.com">posh@LeadSquared.com</a>.

**REDRESS:** The policy explains the process of lodging a complaint, including what the complaint should contain, such as a description of incidents, dates, witnesses, and evidence. LeadSquared ensures confidentiality, non-retaliation, and provides assistance for criminal proceedings if desired.

**DISCIPLINARY ACTION AND REPEAT OFFENDERS:** After an investigation, if harassment is substantiated, prompt remedial action will be taken. If the offense is proven disciplinary actions may include reprimands, fines, performance reviews, freezes on promotions or salary increases, transfer, demotion, suspension, or termination.

**HELPING HARASSMENT VICTIMS:** LeadSquared is committed to supporting victims of sexual harassment. If a complaint is justified, the complainant may receive a commitment to cease the behavior, an apology, re-crediting of leave, or other compensation. The complainant's job and benefits will not be jeopardized.

**SPEAK UP, WE LISTEN:** The policy encourages employees to speak up about sexual harassment, promising that LeadSquared will take action and support harassed employees. LeadSquared aims to create a happy and thriving workplace through the active reporting and prevention of sexual harassment.

**CONCLUSION:** LeadSquared's sexual harassment policy emphasizes its commitment to creating a safe and respectful workplace, with zero tolerance for sexual harassment. It outlines the reporting process, disciplinary actions, support for victims, and the importance of speaking up. By fostering a culture of accountability and respect, LeadSquared aims to prevent and address sexual harassment effectively.