



Wipro's Policy Global Policy on Prevention of Sexual Harassment

Document Control

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Purpose:

1. Wipro is committed to providing a safe, non-discriminatory, non-hostile and harassment free work environment that is free from any form of intimidation or harassment that is sexual in nature and to maintain a workplace where all the employees are considered equal and where the dignity of each employee is respected and protected.
2. Wipro has zero tolerance to Sexual Harassment.
3. It is the duty of every employee to behave in such a way to keep the workplace free from any kind of Sexual Harassment.

Audience and Scope:

1. This Policy shall cover the process to investigate and redress Sexual Harassment complaints at the Workplace or Extended Workplace
2. This Policy is gender neutral and is aimed to protect the interests of everyone.

The Policy covers:

- India, under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and the Company's internal Policies.
- Other countries, as modified in the Appendices

If there is a conflict between the terms under this Policy and the applicable local law/guidelines, the terms under the applicable local law/guidelines shall prevail over the terms under this Policy.

What is Not in Scope:

This Policy does not cover:

1. interactions or engagements in personal capacity, even if it started or extended into the Workplace or Extended Workplace.
2. any complaints that do not fall under the definition of Sexual Harassment.

Applicability:

This Policy shall be applicable to Wipro Limited (including subsidiaries, acquired entities and affiliate companies) referred to as "Company."

It covers-

- (i) employees, whether full-time, part-time, temporary, and contractual personnel, trainees, persons on probation and apprentices while on an engagement with the Company in India.
- (ii) customers, vendors and their employees, consultants, and anyone else doing business at the Company's Workplace or interactions arising from any work being carried out by or on behalf of the Company.
- (iii) anyone who is present in the Workplace such as candidates, visitors, guests, etc.

Definitions:

1. **"Sexual Harassment"**: Sexual harassment is inclusively defined as any unwelcome sexually determined behaviour (whether directly or by implication), that adversely impacts equality at work, dignity, and rights of employees, adversely impacts the health, confidence, morale, and performance of those affected. It also includes any kind of sexually intonated harassment which affects the Aggrieved Person in any way, or which any reasonable person would perceive as sexual harassment.

"Unwelcome sexually determined behaviour" shall include but not be limited to the following:

- i. Any unwelcome physical contact and advances (direct or indirect), verbal or non-verbal conduct of a sexual nature or using technology in a work environment.
- ii. Direct or implied requests by any person for sexual favours where it may become a term or condition of employment or as a basis for employment decisions. Example: offers of favourable reviews, salary increases, promotions, increased benefits, continued employment, or any other reward.
- iii. Sexually coloured/implied (double meaning) remarks or jokes, whether made directly with the affected or otherwise.
- iv. Displaying pornography or offensive content.
- v. Such advances, requests, or conduct (whether direct or implied) have the purpose or effect of interfering with work.

- vi. Where it creates an intimidating, hostile, humiliating or sexually- offensive work environment, and affects the mental health of the person.
- vii. Where there is treatment that is likely to affect the concerned person’s safety.
- viii. Threat of negative action for refusal to accede to sexual demands, e.g., threatening to write a negative review etc.

Sexual Harassment also include instances which have been laid down by applicable law either by way of enactment or by other means such as judgements or can be perceived as sexual harassment within the framework of law, or to further the objective of law.

The above examples are not exhaustive and unacceptable conduct is explained through further examples in **Annexure A.**

- 2. “Workplace” means all the administrative locations of the Company and includes Extended Workplace such as any place visited by the employee of the Company or Company’s entities arising out of, or during the course of employment (such as meetings at third party premises, offsite meetings and public venues), including transportation provided by the Company for undertaking such journey, Company-sponsored formal and informal team events, Company offsites, parking lots in the administrative locations, business conferences organized by the Company, airports and/or any other location and as provided under applicable laws and guidelines in each country but excludes any acts where the context turns personal. Workplace also includes all digital platforms of interaction where the employee represents the Company.
- 3. “Aggrieved Person” is a person, whether employed or not, who alleges to have been subjected to any act of Sexual Harassment by the Respondent.
- 4. “Complainant” is either the Aggrieved Person or a person authorized by the Aggrieved Person who is raising the complaint.
- 5. “Respondent” is a person against whom the Complainant has made the complaint.
- 6. “Employer” means a senior employee(s) of the Company being in a position has been designated as employer and/or any other definition provided under applicable law in each country.
- 7. “Prevention of Sexual Harassment Committee” (PSHC) means the committing consisting of global members who would form the IC to conduct investigations basis region where case is reported and under applicable local law. The PSHC is listed in Annexure B of this Policy. It also includes the Chairperson of PSHC.
- 8. “Internal Committee”(IC) means the team constituted from the PSHC members for investigation of a case. A minimum of 3 members, including the Presiding officer is mandated unless there are any specific requirements under applicable local laws. The IC shall have an external member wherever applicable by law.

The following functions are executed by the IC:

- i) Inquire into/ investigate complaints
 - ii) Recommend necessary actions based on investigation and reporting.
- 9. “Presiding Officer” means the member of the IC at a senior level selected and appointed to lead a case and designated to hold such a position (Note: If the applicable local law specifies the Presiding Officer to be a woman, then the applicable local law shall prevail. For e.g., India and Philippines).

Internal Committee Assurances

1. Confidentiality:

All complaints are kept confidential and disclosed to those necessary only to the extent needed to conduct a proper investigation. However, despite best efforts, it may not always be possible to keep anonymity of parties or witnesses throughout the investigation in all cases.

2. Fairness & Without Bias:

There is no favouritism or personal preference for anyone while investigating a case of Sexual Harassment. IC members are trained to remain neutral and not allow individual opinions to replace facts and records. The investigation and decision-making procedures are just, reasonable, and impartial to all parties involved.

3. Non-Retaliation:

No person shall be subject to adverse action because, they complain, report an incident of Sexual Harassment, provide information or who, as a witness or otherwise, assist in any investigation of a Sexual Harassment complaint. Allegations of retaliation will be investigated and processed under the Ombuds Policy.

Complaints:

1. Who can raise a complaint:

- i. Aggrieved Person
- ii. Anyone authorized by the Aggrieved Person

Note: An anonymous complaint shall not be investigated under this Policy.

2. Where to raise a complaint:

The Complainant can report a complaint in any of the following ways:

- i. Email to safe.workplace@wipro.com
- ii. Upload the details on Ombuds Portal www.wiproombuds.com.

Note: Complaints made on the Ombuds portal will be redirected to the PSHC, if they are determined to fall under this Policy.

3. When to raise a complaint:

The complaint should be submitted in writing within a period of three months from the date of the incident of Sexual Harassment, and in case of a series of incidents, within a period of three months from the date of the last incident. The IC, for reasons to be recorded in writing, can accept a complaint beyond the time limit, if it is satisfied that the circumstances were such which prevented the Complainant from filing a complaint within the time limit.

Three months will be the standard norm under this Policy unless otherwise prescribed under applicable local laws and guidelines.

Conciliation (only applicable in India and any other country if explicitly mentioned under that country's applicable law and guidelines).

1. The IC may, before initiating inquiry, only at the request of the Aggrieved Person, take steps to settle the matter between the Aggrieved Person and the Respondent through conciliation.
2. No monetary settlement shall be made as a basis of conciliation.
3. Where a settlement has been arrived, no further inquiry shall be conducted by the IC.
4. When any agreed settlement has not been complied with by the Respondent, or if the Aggrieved Person does not request for conciliation, or if the conciliation process fails, the IC shall proceed to make an inquiry into the complaint.

Interim Actions

During pendency of an inquiry and upon a written request by the Aggrieved Person, the IC may at its discretion, recommend appropriate interim measures to the Employer (subject to the IC having reviewed the matter on a prima facie basis and being satisfied that pending the inquiry, that there is need for interim intervention in the matter on a case-to-case basis) without impacting the final decision such as:

1. Transfer the Aggrieved Person or Respondent to any other Workplace; or,
2. Grant leave to the Aggrieved Person or Respondent provided that the leave shall be in addition to the leave they would normally be entitled to; or
3. Restrain the Respondent from appraising or supervising the work of the Complainant and/or Aggrieved Person; or doing any such act which can affect the Complainant or Aggrieved Person negatively.
4. Grant such other relief to the Aggrieved Person as may be required in the circumstances.
5. Require the Respondent to remain at or work from home or a Workplace where the Aggrieved Person is not located.
6. Suspend the Respondent pending the inquiry.
7. Any other remedy.

Inquiry Procedure

Unless otherwise explicitly mentioned under any country's applicable law and guidelines in Annexure C the inquiry process and/or the timelines shall be as mentioned below:

1. The IC shall inform the Employer of having received a complaint.
2. Upon receipt of complaint, the IC shall review the complaint to ensure that it can be accepted under this Policy. Upon such determination, the IC shall, within a period of seven working days from receipt, send one copy of the complaint to the Respondent. The IC shall give an opportunity to the Respondent to submit a written explanation (if the Respondent so desires) within ten working days from the date of their receipt of the complaint and supporting documents.
3. The Aggrieved Person will be provided with a copy of the written explanation submitted by the Respondent (if any).
4. If either party desire to lead any evidence and/or require any witness/es to be called, they shall communicate in writing to the IC, the names of such witness/es whom they propose to examine, after which the Presiding Officer will summon the said witness(es). The IC may call upon any witness or examine any records it deems fit as part of its inquiry process.
5. For conducting and completing an inquiry, the Presiding Officer of the IC may convene such number of hearings as deemed necessary to complete the inquiry. If either party fails to attend three consecutive hearings to which they are called, without sufficient cause, the IC may terminate the inquiry or pass an ex-parte order. However, such an ex-parte decision/recommendation may not be passed without giving a fifteen -day written notice in advance to the concerned parties.
6. When the Aggrieved Person is a third party and does not agree for a personal appearance before the IC due to any reason, the IC shall proceed with the inquiry based on prima facie evidence.
7. The IC shall record the entire process of hearing and/or prepare the minutes of the hearing and getting it duly signed by the parties attending the hearing as their acceptance of the record.
8. The parties shall not be allowed to bring in any legal practitioner to represent them in their case at any stage of the proceedings before the IC. (Refer Annexure C for exceptions).
9. All complaints shall be investigated in a sensitive and confidential manner.
10. The inquiry shall be completed within a period of ninety days from the date of receipt of the complaint.
11. After completing its inquiry, the IC will submit recommendations and its report to the Employer for further action, if any, within ten days of the conclusion of the inquiry.
12. The IC report will also contain recommendations on action, if any, required to be taken on the complaint and corrective, preventive and other actions, if any, required from the Company.
13. The Complainant and the Respondent will be informed about the closure and outcome of the investigation.

Disciplinary Actions:

The Disciplinary Handbook of the Company contains the disciplinary actions which may be recommended by the IC which can range from a warning letter to termination. Once the recommendations are made, the Employer shall implement the disciplinary action.

All investigations which lead to a decision of termination of employment are reviewed and approved by the Compliance Committee as part of the completion of the inquiry process.

Malicious Complaints:

Where the IC arrives at a conclusion that the allegation against the Respondent is malicious or the Complainant has made the complaint knowing it to be false or has produced any forged or misleading document, remedial action will be recommended against the Complainant. It is important to note that mere inability to substantiate a complaint or provide adequate proof will not necessarily be malicious . or attract action against the Complainant.

If any witness has given false evidence or produced any forged or misleading document, disciplinary action will be recommended on them.

Right to appeal:

If the Aggrieved Person or the Respondent is dissatisfied with the actions taken by the Employer or the Compliance Committee for the resolution of a complaint, they can file an appeal to the local authorities in accordance with applicable local law.

Policy Review:

This Policy shall be reviewed every 2 years to ensure that it remains consistent with the overall objectives of the Company and with the applicable laws. The Policy may be reviewed at shorter intervals if the law pertaining to Sexual Harassment changes before the stipulated time of review.

Annexure A - Examples of Sexual Harassment at The Workplace

This list is not exhaustive. Examples are inclusive but are not limited to the below.

Physical:

- Unwelcome touching or hugging
- Sexual or physical contact, ranging from kissing or touching to serious assault
- Brushing against sexual parts of the body
- Pressing or rubbing up against a victim
- Indecent exposure
- Sexual sneak attacks (such as grabbing private parts on the run)

Verbal/ Non-verbal: (Can be Virtual or in-person)

- Comments about physical appearance
- Insisting that employees wear revealing clothing
- Sexually coloured remarks
- Discussion of one's partner's sexual inadequacies
- Tales of sexual exploits and encounters
- Inappropriate gifts like lingerie
- Insisting that employees wear revealing clothing
- Pressure for dates
- Subtle or overt pressure for sexual favours
- Soliciting/ demanding sexual services Or Requiring sex for job retention or advancement
- Repeated sexual invitations even when the person invited has refused/ignored similar invitations
- person invited has refused/ignored similar invitations - Sexual assault
- Spreading rumours about a person's personal or sexual life

Visual: (Can be Virtual or in-person)

- Displaying or giving sexually suggestive pictures, magazines, or cartoons.
- Any material that is sexual in nature, sexist, sexually explicit and is displayed in the workplace, circulated, or put in someone's workspace or belongings, or on a computer or fax machine or on the Internet or any other public display system or public place in the work premises
- Looking up and down a person's body /leering or staring
- Sexist and insulting graffiti
- Lewd and threatening letters
- Offensive gestures
- Obscene phone calls, text messages, instant messages

Annexure B - Contact Details of PSHC Members

https://wipro365.sharepoint.com/sites/wipro-people-policies/SitePages/Policies.aspx?Name=List_of_PSH_Committee_Members_Nov_2022.pdf

Annexure C - Country Specific Summary

Given below are country specific guidelines, other regional requirements will be considered case-to-case basis

UK

- a. IC is called as “Investigation Committee”.
- b. Validation process for the complaint mentioned is called “Investigation”
- c. Investigation Process involves only fact finding and presenting the same to Disciplinary committee.
- d. Disciplinary committee - internal to Wipro consisting of more senior manager than lead investigator will conclude and provide recommendations to the case according to Disciplinary Policy.
- e. Conciliation may be initiated only after Disciplinary Hearing if the respondent stays within the organization.

USA

- f. Panel formation:
- g. A U.S.-based investigator must participate in all investigations.
- h. All investigators must attend investigations training on U.S. law and process.
- i. Notice of inquiry & Complaint closure TAT:

within 2 weeks panel should be able to identify the exact issues and have an approach to resolve.

Mexico

- j. In Mexico there are detailed regulations contained in NOM035 for prevention of harassment at workplace including sexual harassment. These regulations require a local committee to be formed consisting of persons from Management, HR, Finance, and legal functions. There is also a requirement to include workers in the said committee.

Philippines

- k. The IC is called Committee on Decorum and Investigation (CODI).
- l. Under the law, “Presiding Officer” shall be a woman and will be a member of the Committee.
- m. The Committee shall be composed of at least one (1) representative each from the management, the union, if any, the second level employees, and from the rank-and-file employees, duly selected by the unit concerned. Not less than half of the members of the CODI will be women.
- n. Complaint must be closed within 10 working days from the receipt and clarification of the Complaint. (Note: where the Complaint is vague, too general, or lacks the prescribed information, the Committee may require the Complainant to clarify the allegations or provide additional details in writing. The Complaint shall not be deemed duly filed if the Complainant refuses or fails to provide clarifications despite notice).

- o. The Committee will prepare the report and send the recommendation to the Employer. Details will be provided to the parties. (Note: Ten (10) working days consist of business days in general, excluding holidays, non-working special days, or when the employer is closed).

Middle East

- p. An Arabic speaker is required in the panel as best practice
- q. Conciliation is mandatory in Egypt

Brazil

- r. Sexual harassment that can be investigated by the organization is called “Sexual hassle”.
- s. Sexual harassment in the lines of Quid pro quo by senior colleague will not be covered in the scope, as it is considered criminal offence.
- t. Employee cannot be suspended as part of Interim Measure.
- u. Parties can be accompanied by Lawyer
- v. Consent form to be signed by party for recording the meeting.

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Revision History

Version	Revision Date	Reason for Change	Reviewed By	Approved By	Date Approved
Ver.2	04/12/2023	Consistency with applicable law	Sharmila Paranjpe	Tejal Patil	04/12/2023