

**Prevention and Redressal of  
Sexual Harassment at  
Workplace Policy**

**Latest Updated Date: 19 Aug, 2025**

## Scope

This policy applies to all employees of HCL Technologies Limited, its group companies and joint ventures operating out of India ("HCLTech") like regular, temporary, ad hoc, daily wagers, contractual staff, vendors, clients, consultants, trainees, probationers, apprentices, contract labour and also all visitors to HCLTech. Any complaints about sexual harassment shall be treated under this policy.

## Scope

This policy defines sexual harassment and provides guidelines to prevent and report sexual harassment at HCLTech America Inc.

This policy applies to all employees of HCLTech America Inc. and other non-employees such as contractors, vendors, clients, consultants, trainees, and visitors. It covers interactions between employees and non-employees, ensuring that any complaints regarding harassment are addressed promptly and appropriately.

## Scope

This policy applies to all employees in relation to other employees of HCLTech as well as others like contractual staff, vendors, clients, consultants, trainees, visitors onsite across the world. Any complaints of sexual harassment filed by an employee or by others as stated above will be treated under this policy.

## Scope

This policy applies to all employees in relation to other employees of HCLTech as well as others like contractual staff, vendors, clients, consultants, trainees, visitors onsite across the world. Any complaints of sexual harassment filed by an employee or by others as stated above will be treated under this policy.

## Policy Statement

*At HCLTech, we recognize that a sense of security in the workplace is essential for the empowerment and inclusive growth of employees. This policy reflects our dedication to cultivating a positive, safe, and secure work environment and promoting equality and dignity for every individual in our organization.*

A Policy for Prevention and Redressal of Sexual Harassment at the Workplace.

To ensure a positive and safe work environment which is free of sexual harassment, the organisation has formulated rules prohibiting Sexual Harassment at the Workplace. The objective of this policy is to provide protection against sexual harassment of employees within but not limited to the office premises and for Prevention and Redressal of complaints of sexual harassment and for matters connected therewith or incidental thereto.

The policy will ensure that employees are protected against sexual harassment at all the work places, be it in public or private. This will contribute to realisation of their right to gender equality, life and liberty and equality in working conditions. The sense of security at the workplace will improve employee's participation in work, resulting in their empowerment and inclusive growth.

### Definition of Sexual Harassment:

“Sexual harassment” shall include any one or more of the following unwelcome acts or behaviours, whether directly or by implication namely:-

1. Physical contact and advances;or
2. A demand or request for sexual favours;
3. Making sexually colored remarks;
4. Showing pornography; or
5. Any other unwelcome physical, verbal or non-verbal conduct of sexual nature;

The following circumstances among other circumstances if it occurs or is present in relation to or connected with any act or behaviour of sexual harassment may amount to sexual harassment.

1. Implied or explicit promise of preferential treatment in her employment or
2. Implied or explicit threat of detrimental treatment in her employment or
3. Implied or explicit threat about her present or future employment status or

4. Interference with her work or creating an intimidating or offensive or hostile work environment.

You may be experiencing sexual harassment when one of the following is true:

1. It is stated or understood that you must submit to the demanded or suggested behaviour in order to get or keep a job;
2. Employment decisions are based on whether or not you go along with the demanded or suggested behaviour, or
3. The demanded or suggested behavior creates a hostile or abusive work atmosphere that changes the conditions of your job,
4. Sexual harassment could be:

- "Quid pro quo" i.e. "this for that". Harassment occurs when decisions regarding employment are promised, threatened or given, based upon whether or not one or more employees will submit to sexually-oriented conduct. However, situations of Quid pro quo sexual harassment are far broader. In a quid pro quo situation, the sexual behavior does not have to be out rightly physical. For example, a supervisor might give the best work assignments to employees who don't spurn his/her sexually-oriented behavior and may penalize those who spurn such advances.
- "Hostile environment" sexual harassment occurs where the sexually-oriented conduct of one employee creates an offensive and unpleasant working environment for any other employee. Harassment is often about one person (or a group of people) using power inappropriately over another person/group of people. But harassment can also happen between people when there is no power relationship. It may simply create a hostile environment.
- Sexual Harassment is a misconduct under the Disciplinary Policy of the company

**Types of behavior which can be considered as sexual harassment** - Depending on the circumstances, each of the following kinds of behavior may be sexual harassment:

- a) Material that is sexual in nature, sexist, sexually explicit and so on 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.
- b) Verbal abuse or comments that put down people because of their sex
- c) Comments about people's (women/men) bodies and physical appearance
- d) Tales of sexual exploits
- e) Graphic descriptions of pornography
- f) Pressure for dates
- g) Sexually explicit gestures
- h) Unwelcome touching and hugging
- i) Sexist and insulting graffiti
- j) Sexist jokes and cartoons. There is a difference between harmless humor which may refer to gender, race and so on and using a racist, sexist or other types of stereotyping jokes to have a "dig" at someone (and therefore to harass them). If this difference is not clear or if someone is offended, the behavior should stop immediately
- k) Obscene phone calls
- l) Displaying pornography in the workplace or otherwise
- m) Insisting that workers wear revealing clothing
- n) Inappropriate comments about one's dressing
- o) Inappropriate gifts (for example, lingerie)
- p) Discussion of one's partner's sexual inadequacies
- q) Lewd and threatening letters "Accidentally" brushing sexual parts of the body
- r) Pressing or rubbing up against a victim
- s) Sexual sneak attacks (such as grabbing private parts on the run)

- t) Indecent exposure
- u) Subtle or overt pressure for sexual favors
- v) Soliciting sexual services
- w) Demanding sexual services
- x) Sexual or physical contact, such as slapping, kissing or touching.
- y) Intrusive questions about sexual activity
- aa) Sexual assault (as defined under Local Law)
- bb) Repeated sexual invitations when the person invited has refused/ignored similar invitations
- cc) Coerced sexual intercourse (e.g., as a condition of employment or academic status)

**Note: A single act or occurrence shall also be enough to be construed as sexual harassment.**

#### **Sexual Harassment at the Workplace-Additional information for reference -**

For example, if a co-worker accidentally brushes against you, it would not be considered sexual harassment. However, if that person repeatedly finds opportunities to brush against you, it is no longer accidental - it is deliberate. Behavior like this, which may make you feel uncomfortable and adversely affect your work, is sexual harassment. Conduct that might be harmless or even enjoyable in a social situation can be upsetting at work. Sexual behavior that is repeated, unwanted and interferes with your job has crossed the line: it is not only inappropriate, it is illegal. Some behavior may be so extreme - such as sexual assault - that it constitutes sexual harassment even if the behavior occurs only once.

#### **Prevention and Redressal of Harassment at HCL Technologies -**

HCLTech is committed to providing an environment free of any and all kinds of harassment including sexual harassment, gender based harassment, harassment related to special conditions like pregnancy, childbirth, harassment based on any kind of medical conditions, race, ethnicity, religious creed, color, national origin or ancestry, physical or mental disability, medical condition, marital status, age, sexual orientation, etc. This policy applies to all persons engaged directly or indirectly with HCLTech and prohibits any kind of harassment of any employee of HCLTech or any person visiting or working with HCLTech including supervisors, vendors and clients. If the Company determines that harassment has occurred, appropriate remedial action shall be taken. Any employee determined by the Company to have caused any kind of harassment shall be dealt appropriate disciplinary action, up to, and including termination. The Company shall not retaliate against anyone for filing a complaint and shall not tolerate or permit retaliation by management, employees or co-workers. Workplace Sexual harassment should not be ignored under any circumstances because silence or the act of ignoring towards the harassing incident conduct may be interpreted as acceptance of such incident or conduct. In making our work atmosphere healthier and free from harassment. The Company has some defined set of guidelines defined for employee; employer to make a work environment free from Harassment.

#### **Employee Responsibility**

1. All employees are mandated to read and acquaint themselves with the company policy with respect to any instances of sexual harassment reported at the workplace. Pleading ignorance about the policy or the following consequences shall not stand a valid ground in any case whatsoever.
2. The detailed document on prevention of sexual harassment at work place is available on Policies Studio and with all HR officers of the facility. The employees may address their doubts or concerns, if any to their local HR representative
3. Employees of HCLTech must conduct themselves so as to ensure a work environment that promotes, respects and upholds the dignity of every individual at the workplace and does not become the cause of any physical and mental harassment. This term and act of "harassment" includes but is not restricted to unwelcome behaviour whether through visual displays, verbal, non-verbal, physical or other conduct making a person submit to requests, favours, threats or demands that alter or threaten to alter the terms of employment and interfere with work conditions.
4. Employees must report every incident of perceived harassment that they are aware of through the official channels mentioned here.

- Employees are expected to cooperate with the company in investigations and in preventing and curtailing unlawful discrimination and harassment at the workplace.
- Any misbehaviour by the complainant/s or Respondent/s or Witnesses or any other employee, will be construed as a misconduct under the COBEC policy and IC has the right to recommend disciplinary action against them.

### Employer's Responsibility

- Prevent and prohibit all and any acts of harassment, including sexual harassment, in order to ensure a safe and healthy work environment.
- Redress and resolve grievances pertaining to sexual harassment.
- Take the following proactive steps:
  - Display the penal consequences of the acts of sexual harassment at all conspicuous places.
  - Conduct regular workshops and employee awareness programs for gender sensitization.
  - Create forum for open dialogues for creating sensitization towards gender issues and also address various concerns and issues highlighted thereof.
  - Orientation programs to be conducted for the Internal Committee. Conduct capacity building and skill building programs for the Members of the Internal Committee.
  - Monitor timely submission of the reports including Annual Report by the Internal Committee.
  - Timely and efficient enactment of the recommendations received from the Internal Committee.
- To assist the aggrieved person in filing an official complaint with the concerned authorities under the Local Law.

### Internal Committee (IC) -

The company has constituted a committee for the redressal of all sexual harassment complaints, known as the "Internal committee" (IC). IC is established at all administrative offices located at different places or divisional or sub-divisional level or regional level.

### The IC shall comprise of:

#### Bengaluru, Hubli and all other locations in State of Karnataka

#### List of Presiding Officers, Internal Committee and External members for the above mentioned locations are given below:

Total No of Presiding Officers	4 nos
Total Internal Committee Members	19 nos
External Members	1

S No	Name	SAP ID	Status	E mail ID	Contact No
1	Raghu KN	40209133	ICM	<a href="mailto:RAGHU.KN@HCLTECH.COM">RAGHU.KN@HCLTECH.COM</a>	080-39610000
2	Priyam Jain	52191092	ICM	<a href="mailto:PRIYAM.JAIN@HCLTECH.COM">PRIYAM.JAIN@HCLTECH.COM</a>	080-39610000
3	Kavya Patil	51844051	ICM	<a href="mailto:KAVYA.PATIL@HCLTECH.COM">KAVYA.PATIL@HCLTECH.COM</a>	080-39610000
4	Smitha Sara	51960612	ICM	<a href="mailto:SMITHA.SARA@HCLTECH.COM">SMITHA.SARA@HCLTECH.COM</a>	080-39610000
5	Afra Safeer	51856461	ICM	<a href="mailto:AFRA.SAFEER@HCLTECH.COM">AFRA.SAFEER@HCLTECH.COM</a>	080-39610000
6	SUNNANDA PATTANAYAK	40177478	ICM	<a href="mailto:SUNANDA.PATTANAYAK@HCLTECH.COM">SUNANDA.PATTANAYAK@HCLTECH.COM</a>	080-39610000
7	Narahari	40191419	ICM	<a href="mailto:NARAHARI.AITHAL@HCLTECH.COM">NARAHARI.AITHAL@HCLTECH.COM</a>	080-39610000

8	Sandhyalakshmi	51361232	ICM	<a href="mailto:SANDHYALAKSHMI.V@HCLTECH.COM">SANDHYALAKSHMI.V@HCLTECH.COM</a>	080-39610000
9	SHINI PIOUS	40192847	ICM	<a href="mailto:SHINI.PIOUS@HCLTECH.COM">SHINI.PIOUS@HCLTECH.COM</a>	080-39610000
10	Nanditha Ravindran	51734929	ICM	<a href="mailto:NANDITHA.R@HCLTECH.COM">NANDITHA.R@HCLTECH.COM</a>	080-39610000
11	Asha Prakash	51340557	PO	<a href="mailto:ASHA.PRAKASH@HCLTECH.COM">ASHA.PRAKASH@HCLTECH.COM</a>	080-39610000
12	Rita Patel	51751307	ICM	<a href="mailto:PATEL.R@HCLTECH.COM">PATEL.R@HCLTECH.COM</a>	080-39610000
13	Reshmi Jacob	52149398	PO	<a href="mailto:RESHMI.JACOB@HCLTECH.COM">RESHMI.JACOB@HCLTECH.COM</a>	080-39610000
15	Neeraja Desai	40108718	ICM	<a href="mailto:NEERAJA.D@HCLTECH.COM">NEERAJA.D@HCLTECH.COM</a>	080-39610000
16	Jayeta Jithu	51870483	ICM	<a href="mailto:JAYETA.JITHU@HCLTECH.COM">JAYETA.JITHU@HCLTECH.COM</a>	080-39610000
17	Thimmaiah	51946846	ICM	<a href="mailto:THIMMAIAH.KULLA@HCLTECH.COM">THIMMAIAH.KULLA@HCLTECH.COM</a>	080-39610000
18	Shant Kumar	52031281	ICM	<a href="mailto:SHANTKUMAR-S@HCLTECH.COM">SHANTKUMAR-S@HCLTECH.COM</a>	080-39610000
19	Deepa Samukam Janardhan	52184687	ICM	<a href="mailto:DEEPA.SAMUK@HCLTECH.COM">DEEPA.SAMUK@HCLTECH.COM</a>	080-39610000
20	Jossy Roshan Moras	40203722	ICM	<a href="mailto:JOSSY@HCLTECH.COM">JOSSY@HCLTECH.COM</a>	080-39610000
21	Geethanjali S	52169436	ICM	<a href="mailto:GEETHANJALIS@HCLTECH.COM">GEETHANJALIS@HCLTECH.COM</a>	080-39610000
22	Sabrina Rajiv	52008152	PO	<a href="mailto:SABRINA.RAJIV@HCLTECH.COM">SABRINA.RAJIV@HCLTECH.COM</a>	080-39610000
23	Mahesh Babladkarm	51638008	ICM	<a href="mailto:BABLADKARM@HCLTECH.COM">BABLADKARM@HCLTECH.COM</a>	080-39610000
24	SASHA Representative	NA	EM	<a href="mailto:contact@sashaindia.com">contact@sashaindia.com</a>	080-39610000

**Chennai, Tuticorin and all other locations in the State of Tamil Nadu**

**List of Presiding Officers, Internal Committee and External members for the above-mentioned location is given below:**

Total No of Presiding Officers	6 nos
Total Internal Committee Members	32 nos
External Members	1 no

S No	Name	SAP ID	Status	E mail ID	Contact No
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1	Murali Rao Suthraye Krishnantha	40176194	ICM	<a href="mailto:MURALI.SK@HCLTECH.COM">MURALI.SK@HCLTECH.COM</a>	044- 61050000
2	Abinaya Balasubramanian	51796556	ICM	<a href="mailto:ABINAYAB@HCLTECH.COM">ABINAYAB@HCLTECH.COM</a>	044- 61050000
3	Geetika Mehta	52153171	ICM	<a href="mailto:GEETIKA.MEHTA@HCLTECH.COM">GEETIKA.MEHTA@HCLTECH.COM</a>	044- 61050000
4	Gunasekaran Selvaraj HR	40188252	ICM	<a href="mailto:S.GUNASEKARAN@HCLTECH.COM">S.GUNASEKARAN@HCLTECH.COM</a>	044- 61050000
6	Kuttimani. S	40191242	ICM	<a href="mailto:KUTTIMANIS@HCLTECH.COM">KUTTIMANIS@HCLTECH.COM</a>	044- 61050000
7	Geetha Seshadri	51810607	ICM	<a href="mailto:GEETHA.SESHADRI@HCLTECH.COM">GEETHA.SESHADRI@HCLTECH.COM</a>	044- 61050000
8	Newbegin D.N	40100349	ICM	<a href="mailto:NEWBEGINDN@HCLTECH.COM">NEWBEGINDN@HCLTECH.COM</a>	044- 61050000
9	Rohini S	51641888	ICM	<a href="mailto:ROHINI.SEETHARAMAN@HCLTECH.COM">ROHINI.SEETHARAMAN@HCLTECH.COM</a>	044- 61050000
10	Geethai Narayanasamy	51938135	ICM	<a href="mailto:GEETHAI_NARAYANASAMY@HCLTECH.COM">GEETHAI_NARAYANASAMY@HCLTECH.COM</a>	044- 61050000
11	Madhumathi RD	51536005	ICM	<a href="mailto:Madhumathi.Rajudurai@HCLTECH.COM">Madhumathi.Rajudurai@HCLTECH.COM</a>	044- 61050000
12	Shanmugapriya Dhamodharan	52070763	ICM	<a href="mailto:SHANMUGAPRIYA.DHAMO@HCLTECH.COM">SHANMUGAPRIYA.DHAMO@HCLTECH.COM</a>	044- 61050000
13	Ramanan Thirugnanam	52198699	ICM	<a href="mailto:RAMANAN.THIRUGNANAM@HCLTECH.COM">RAMANAN.THIRUGNANAM@HCLTECH.COM</a>	044- 61050000
14	Arul Swaminathan Chidambaram	52202758	ICM	<a href="mailto:ARULSWAMINATH.CHIDA@HCLTECH.COM">ARULSWAMINATH.CHIDA@HCLTECH.COM</a>	044- 61050000
15	Manish Kaushik	40143478	ICM	<a href="mailto:MANISH.KAUSHIK@HCLTECH.COM">MANISH.KAUSHIK@HCLTECH.COM</a>	044- 61050000
16	Rachna Chhabra	40103861	PO	<a href="mailto:RACHNA.CHHABRA@HCLTECH.COM">RACHNA.CHHABRA@HCLTECH.COM</a>	044- 61050000
17	Rajeswari Ramaseshan	40105055	PO	<a href="mailto:RRAJESWARI@HCLTECH.COM">RRAJESWARI@HCLTECH.COM</a>	044- 61050000
18	Latha Radhakrishnan	40178078	PO	<a href="mailto:LATHA.R@HCLTECH.COM">LATHA.R@HCLTECH.COM</a>	044- 61050000
19	Padmajaya Bhagavathiammal	51555660	PO	<a href="mailto:PADMAJAYA.B@HCLTECH.COM">PADMAJAYA.B@HCLTECH.COM</a>	044- 61050000
20	Anita Immanuel	51608306	ICM	<a href="mailto:ANITA.IMM@HCLTECH.COM">ANITA.IMM@HCLTECH.COM</a>	044- 61050000
21	Srividhya Mahesh	51961279	ICM	<a href="mailto:SRIVIDHYA.MAHESH@HCLTECH.COM">SRIVIDHYA.MAHESH@HCLTECH.COM</a>	044- 61050000

22	Reshmi Jacob	52149398	PO	<a href="mailto:RESHMI.JACOB@HCLTECH.COM">RESHMI.JACOB@HCLTECH.COM</a>	044-61050000
23	Barsha Mishra	52182409	PO	<a href="mailto:BARSHA.MISHRA@HCLTECH.COM">BARSHA.MISHRA@HCLTECH.COM</a>	044-61050000
24	Alice Soundarrajan (SEZ - Admin)	40135601	ICM	<a href="mailto:ALICES@HCLTECH.COM">ALICES@HCLTECH.COM</a>	044-61050000
25	Lakshmikanth Srinivasan	40138346	ICM	<a href="mailto:LAKSHMIKANTHS@HCLTECH.COM">LAKSHMIKANTHS@HCLTECH.COM</a>	044-61050000
26	Jayakumar Gopalakrishnan	40184391	ICM	<a href="mailto:GJAYAKUMAR@HCLTECH.COM">GJAYAKUMAR@HCLTECH.COM</a>	044-61050000
27	Shini Pious	40192847	ICM	<a href="mailto:SHINI.PIOUS@HCLTECH.COM">SHINI.PIOUS@HCLTECH.COM</a>	044-61050000
28	Anusha B	51508109	ICM	<a href="mailto:ANUSHA_BALA@HCLTECH.COM">ANUSHA_BALA@HCLTECH.COM</a>	044-61050000
29	Nirmal Kumar V	51559813	ICM	<a href="mailto:NIRMALKUMAR.V@HCLTECH.COM">NIRMALKUMAR.V@HCLTECH.COM</a>	044-61050000
30	Chithra Thambi	51702848	ICM	<a href="mailto:CHITHRA_T@HCLTECH.COM">CHITHRA_T@HCLTECH.COM</a>	044-61050000
31	Ramya Ramadesigan	51804096	ICM	<a href="mailto:RAMYA.RAMADESIGAN@HCLTECH.COM">RAMYA.RAMADESIGAN@HCLTECH.COM</a>	044-61050000
32	Sundar Raman S	51908237	ICM	<a href="mailto:SUNDARRAMAN_S@HCLTECH.COM">SUNDARRAMAN_S@HCLTECH.COM</a>	044-61050000
33	Sangeetha Sankaranarayanan	52027209	ICM	<a href="mailto:SANGEETHA.SANKA@HCLTECH.COM">SANGEETHA.SANKA@HCLTECH.COM</a>	044-61050000
34	Keerthana V	52257014	ICM	<a href="mailto:KEERTHANA.V@HCLTECH.COM">KEERTHANA.V@HCLTECH.COM</a>	044-61050000
35	Prasan Ravi	52098824	ICM	<a href="mailto:PRASAN_RAVI@HCLTECH.COM">PRASAN_RAVI@HCLTECH.COM</a>	044-61050000
36	Satyanarayana Gattupalli	40107935	ICM	<a href="mailto:SATYAGPS@HCLTECH.COM">SATYAGPS@HCLTECH.COM</a>	044-61050000
37	Saraswathy K	51344328	ICM	<a href="mailto:SARASWATHY.KUMAR@HCLTECH.COM">SARASWATHY.KUMAR@HCLTECH.COM</a>	044-61050000
38	Shakthi Shyamala	51993744	ICM	<a href="mailto:SHAKTHI.SYAMALA@HCLTECH.COM">SHAKTHI.SYAMALA@HCLTECH.COM</a>	044-61050000
39	Priyanka Bijolia	52181971	ICM	<a href="mailto:p-priyanka2@hcltech.com">p-priyanka2@hcltech.com</a>	044-61050000
40	SASHA Representative	NA	EM	<a href="mailto:kanti@sashaindia.com">kanti@sashaindia.com</a>	044-61050000

## Coimbatore

List of Presiding Officers, Internal Committee and External members for the above-mentioned location is given below:

Total No of Presiding Officers	3 nos
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Total Internal Committee Members	3 nos
External Members	1 no

S No	Name	SAP ID	Status	E mail ID	Contact No
1	Lakshmikanth Srinivasan	40138346	ICM	<a href="mailto:LAKSHMIKANTHS@HCLTECH.COM">LAKSHMIKANTHS@HCLTECH.COM</a>	0422-665732
2	Pratima Gomes	52081317	PO	<a href="mailto:PRATIMA.GOMES@HCLTECH.COM">PRATIMA.GOMES@HCLTECH.COM</a>	0422-665732
3	Reshmi Jacob	52149398	PO	<a href="mailto:RESHMI.JACOB@HCLTECH.COM">RESHMI.JACOB@HCLTECH.COM</a>	0422-665732
4	Barsha Mishra	52182409	PO	<a href="mailto:BARSHA.MISHRA@HCLTECH.COM">BARSHA.MISHRA@HCLTECH.COM</a>	0422-665732
5	Keerthana V	52257014	ICM	<a href="mailto:KEERTHANA.V@HCLTECH.COM">KEERTHANA.V@HCLTECH.COM</a>	0422-665732
6	Shini Pious	40192847	ICM	<a href="mailto:SHINI.PIOUS@HCLTECH.COM">SHINI.PIOUS@HCLTECH.COM</a>	0422-665732
7	SASHA Representative	NA	EM	<a href="mailto:contact@sashaindia.com">contact@sashaindia.com</a>	0422-665732

#### Hyderabad and all other locations in the State of Telangana

List of Presiding Officers, Internal Committee and External members for the above-mentioned location is given below:

Total No of Presiding Officers	2 nos
Total Internal Committee Members	8 nos
External Members	1 no

S No	Name	SAP ID	Status	E mail ID	Contact No
1	Jyothi Rosarina	51755436	ICM	<a href="mailto:JYOTHI.ROSARINA@HCLTECH.COM">JYOTHI.ROSARINA@HCLTECH.COM</a>	040-3090411
2	Reshmi Jacob	52149398	PO	<a href="mailto:RESHMI.JACOB@HCLTECH.COM">RESHMI.JACOB@HCLTECH.COM</a>	040-3090411
3	Barsha Mishra	52182409	PO	<a href="mailto:BARSHA.MISHRA@HCLTECH.COM">BARSHA.MISHRA@HCLTECH.COM</a>	040-3090411
4	Shini Pious	40192847	ICM	<a href="mailto:SHINI.PIOUS@HCLTECH.COM">SHINI.PIOUS@HCLTECH.COM</a>	040-3090411
5	Ravishankar Silumula	51434217	ICM	<a href="mailto:RAVISHANKAR_S@HCLTECH.COM">RAVISHANKAR_S@HCLTECH.COM</a>	040-3090411
6	Ajo John	51755613	ICM	<a href="mailto:AJO.JOHN@HCLTECH.COM">AJO.JOHN@HCLTECH.COM</a>	040-3090411
7	I. John David	51755622	ICM	<a href="mailto:JOHN.DAVID@HCLTECH.COM">JOHN.DAVID@HCLTECH.COM</a>	040-3090411
8	Keerthana V	52257014	ICM	<a href="mailto:KEERTHANA.V@HCLTECH.COM">KEERTHANA.V@HCLTECH.COM</a>	040-3090411
9	Cinderella Ward	51755666	ICM	<a href="mailto:CINDERELLA.WARD@HCLTECH.COM">CINDERELLA.WARD@HCLTECH.COM</a>	040-3090411
10	Pallavi Pal	52189365	ICM	<a href="mailto:PALLAVI.PAL@HCLTECH.COM">PALLAVI.PAL@HCLTECH.COM</a>	040-3090411
11	SASHA Representative	NA	EM	<a href="mailto:contact@sashaindia.com">contact@sashaindia.com</a>	040-3090411

#### Kolkata and all other locations in the State of West Bengal:

List of Presiding Officers, Internal Committee and External members for the above mentioned location is given below:

Total No of Presiding Officers	2 nos
Total Internal Committee Members	5 nos
External Members	1 nos

S No	Name	SAP ID	Status	E mail ID	Contact No
------	------	--------	--------	-----------	------------

1	Madhuchhanda Pandit	51578319	ICM	<a href="mailto:MADHUCHHANDA.P@HCLTECH.COM">MADHUCHHANDA.P@HCLTECH.COM</a>	0124-4109910
2	Reshmi Jacob	52149398	PO	<a href="mailto:RESHMI.JACOB@HCLTECH.COM">RESHMI.JACOB@HCLTECH.COM</a>	0124-4109910
3	Barsha Mishra	52182409	PO	<a href="mailto:BARSHA.MISHRA@HCLTECH.COM">BARSHA.MISHRA@HCLTECH.COM</a>	0124-4109910
4	SHINI PIOUS	40192847	ICM	<a href="mailto:SHINI.PIOUS@HCLTECH.COM">SHINI.PIOUS@HCLTECH.COM</a>	0124-4109910
5	Asamanya Mohanty	51442094	ICM	<a href="mailto:ASAMANYA.M@HCLTECH.COM">ASAMANYA.M@HCLTECH.COM</a>	0124-4109910
6	Angan Mukherjee	51498576	ICM	<a href="mailto:ANGAN.M@HCLTECH.COM">ANGAN.M@HCLTECH.COM</a>	0124-4109910
7	Ajmera Khatun	51743889	ICM	<a href="mailto:AJMERA.K@HCLTECH.COM">AJMERA.K@HCLTECH.COM</a>	0124-4109910
8	SASHA Representative	NA	EM	<a href="mailto:contact@sashaindia.com">contact@sashaindia.com</a>	0124-4109910

#### Lucknow

List of Presiding Officers, Internal Committee and External members for the above mentioned location is given below:

Total No of Presiding Officers	2 nos
Total Internal Committee Members	7 nos
External Members	1 no

S No	Name	SAP ID	Status	E mail ID	Contact No
1	Reshmi Jacob	52149398	PO	<a href="mailto:RESHMI.JACOB@HCLTECH.COM">RESHMI.JACOB@HCLTECH.COM</a>	0522-7148000
2	Barsha Mishra	52182409	PO	<a href="mailto:BARSHA.MISHRA@HCLTECH.COM">BARSHA.MISHRA@HCLTECH.COM</a>	0522-7148000
3	Rishi Kumar	40100938	ICM	<a href="mailto:RISHIK@HCLTECH.COM">RISHIK@HCLTECH.COM</a>	0522-7148000
4	Vivek Sateerja	51356032	ICM	<a href="mailto:VIVEK.SATEEJA@HCLTECH.COM">VIVEK.SATEEJA@HCLTECH.COM</a>	0522-7148000
5	Raina Khandelwal	51737567	ICM	<a href="mailto:RAINA.K@HCLTECH.COM">RAINA.K@HCLTECH.COM</a>	0522-7148000
6	Vibhas Nigam	51855834	ICM	<a href="mailto:VIBHAS.NIGAM@HCLTECH.COM">VIBHAS.NIGAM@HCLTECH.COM</a>	0522-7148000
7	Neha Dixit	51859995	ICM	<a href="mailto:NEHA.DIXIT@HCLTECH.COM">NEHA.DIXIT@HCLTECH.COM</a>	0522-7148000
8	Varsha Prasad	51984322	ICM	<a href="mailto:VARSHA.PRASAD@HCLTECH.COM">VARSHA.PRASAD@HCLTECH.COM</a>	0522-7148000
9	Vishi Sukhwani	52080377	ICM	<a href="mailto:VISHI.SUKHWANI@HCLTECH.COM">VISHI.SUKHWANI@HCLTECH.COM</a>	0522-7148000
10	SASHA Representative	NA	EM	<a href="mailto:contact@sashaindia.com">contact@sashaindia.com</a>	0522-7148000

#### Patna and all other Location in the State of Bihar

List of Presiding Officers, Internal Committee and External members for the above mentioned location is given below:

Total No of Presiding Officers	2 nos
Total Internal Committee Members	7 nos
External Members	1 no

S No	Name	SAP ID	Status	E mail ID	Contact No
1	Reshmi Jacob	52149398	PO	<a href="mailto:RESHMI.JACOB@HCLTECH.COM">RESHMI.JACOB@HCLTECH.COM</a>	0522-7148000
2	Barsha Mishra	52182409	PO	<a href="mailto:BARSHA.MISHRA@HCLTECH.COM">BARSHA.MISHRA@HCLTECH.COM</a>	0522-7148000
3	Rishi Kumar	40100938	ICM	<a href="mailto:RISHIK@HCLTECH.COM">RISHIK@HCLTECH.COM</a>	0522-7148000
4	Vivek Sateerja	51356032	ICM	<a href="mailto:VIVEK.SATEEJA@HCLTECH.COM">VIVEK.SATEEJA@HCLTECH.COM</a>	0522-7148000
5	Raina Khandelwal	51737567	ICM	<a href="mailto:RAINA.K@HCLTECH.COM">RAINA.K@HCLTECH.COM</a>	0522-7148000
6	Vibhas Nigam	51855834	ICM	<a href="mailto:VIBHAS.NIGAM@HCLTECH.COM">VIBHAS.NIGAM@HCLTECH.COM</a>	0522-7148000
7	Neha Dixit	51859995	ICM	<a href="mailto:NEHA.DIXIT@HCLTECH.COM">NEHA.DIXIT@HCLTECH.COM</a>	0522-7148000
8	Varsha Prasad	51984322	ICM	<a href="mailto:VARSHA.PRASAD@HCLTECH.COM">VARSHA.PRASAD@HCLTECH.COM</a>	0522-7148000
9	Vishi Sukhwani	52080377	ICM	<a href="mailto:VISHI.SUKHWANI@HCLTECH.COM">VISHI.SUKHWANI@HCLTECH.COM</a>	0522-7148000
10	SASHA Representative	NA	EM	<a href="mailto:contact@sashaindia.com">contact@sashaindia.com</a>	0522-7148000

**Madurai**

List of Presiding Officers, Internal Committee and External members for the above-mentioned location is given below:

Total No of Presiding Officers	3 nos
Total Internal Committee Members	6 nos
External Members	1 no

S No	Name	SAP ID	Status	E mail ID	Contact No
1	Shini Pious	40192847	ICM	<a href="mailto:SHINI.PIOUS@HCLTECH.COM">SHINI.PIOUS@HCLTECH.COM</a>	0452-6667201
2	Sasikala Sethu	51436685	PO	<a href="mailto:SASIKALA.S@HCLTECH.COM">SASIKALA.S@HCLTECH.COM</a>	0452-6667201
3	Reshmi Jacob	52149398	PO	<a href="mailto:RESHMI.JACOB@HCLTECH.COM">RESHMI.JACOB@HCLTECH.COM</a>	0452-6667201
4	Barsha Mishra	52182409	PO	<a href="mailto:BARSHA.MISHRA@HCLTECH.COM">BARSHA.MISHRA@HCLTECH.COM</a>	0452-6667201
5	Thirumurugan Subbaraj	12101192	ICM	<a href="mailto:STHIRUMURUGAN@HCLTECH.COM">STHIRUMURUGAN@HCLTECH.COM</a>	0452-6667201
6	Subbaraman B	40100217	ICM	<a href="mailto:SUBBARAMANB@HCLTECH.COM">SUBBARAMANB@HCLTECH.COM</a>	0452-6667201
7	Prakash Raman	40113721	ICM	<a href="mailto:PRAKASH.RAMAN@HCLTECH.COM">PRAKASH.RAMAN@HCLTECH.COM</a>	0452-6667201
8	Rani Muthukrishnan	51770708	ICM	<a href="mailto:RANIRA@HCLTECH.COM">RANIRA@HCLTECH.COM</a>	0452-6667201
9	Raghavendran V	51833215	ICM	<a href="mailto:raghavendran.venka@hcltech.com">raghavendran.venka@hcltech.com</a>	0452-6667201
10	SASHA Representative	NA	EM	<a href="mailto:contact@sashaindia.com">contact@sashaindia.com</a>	0452-6667201

**Mumbai**

List of Presiding Officers, Internal Committee and External members for the above-mentioned location is given below:

Total No of Presiding Officers	3 nos
Total Internal Committee Members	4 nos
External Members	1 no

S No	Name	SAP ID	Status	E mail ID	Contact No
1	Swarnalatha Mouli	51912379	PO	<a href="mailto:SWARNALATHA.S@HCLTECH.COM">SWARNALATHA.S@HCLTECH.COM</a>	022-28291997
2	Reshmi Jacob	52149398	PO	<a href="mailto:RESHMI.JACOB@HCLTECH.COM">RESHMI.JACOB@HCLTECH.COM</a>	022-28291997
3	Barsha Mishra	52182409	PO	<a href="mailto:BARSHA.MISHRA@HCLTECH.COM">BARSHA.MISHRA@HCLTECH.COM</a>	022-28291997
4	Shini Pious	40192847	ICM	<a href="mailto:SHINI.PIOUS@HCLTECH.COM">SHINI.PIOUS@HCLTECH.COM</a>	022-28291997
5	Yamini Desai	51651044	ICM	<a href="mailto:YAMINI.DESAI@HCLTECH.COM">YAMINI.DESAI@HCLTECH.COM</a>	022-28291997
6	Baburaj Iyer	51669868	ICM	<a href="mailto:BABURAJ.IYER@HCL.COM">BABURAJ.IYER@HCL.COM</a>	022-28291997
7	Anupama Pillai	52037560	ICM	<a href="mailto:anupama.pillai@hcltech.com">anupama.pillai@hcltech.com</a>	022-28291997
8	SASHA Representative	NA	EM	<a href="mailto:contact@sashaindia.com">contact@sashaindia.com</a>	022-28291997

**Nagpur and all other locations in the State of Maharashtra**

List of Presiding Officers, Internal Committee and External members for the above mentioned location is given below:

Total No of Presiding Officers	2 nos
Total Internal Committee Members	3 nos
External Members	1 no

S No	Name	SAP ID	Status	E mail ID	Contact No
1	Shailesh Kamlakar Awale	40114480	ICM	<a href="mailto:SHAILESHA@HCLTECH.COM">SHAILESHA@HCLTECH.COM</a>	7127380026
2	Shini Pious	40192847	ICM	<a href="mailto:SHINI.PIOUS@HCLTECH.COM">SHINI.PIOUS@HCLTECH.COM</a>	7127380026
3	Swarnalatha Mouli	51912379	ICM	<a href="mailto:SWARNALATHA.S@HCLTECH.COM">SWARNALATHA.S@HCLTECH.COM</a>	7127380026
4	Reshmi Jacob	52149398	PO	<a href="mailto:RESHMI.JACOB@HCLTECH.COM">RESHMI.JACOB@HCLTECH.COM</a>	7127380026
5	Barsha Mishra	52182409	PO	<a href="mailto:BARSHA.MISHRA@HCLTECH.COM">BARSHA.MISHRA@HCLTECH.COM</a>	7127380026
6	SASHA Representative	NA	EM	<a href="mailto:contact@sashaindia.com">contact@sashaindia.com</a>	7127380026

List of Presiding Officers, Internal Committee and External members for the above mentioned locations are given below:

Total No of Presiding Officers	5 nos
Total Internal Committee Members	38 nos
External Members	1 no

S No	Name	SAP ID	Status	E mail ID	Contact No
1	KIRAN	51521594	ICM	<a href="mailto:ARORA.K@HCLTECH.COM">ARORA.K@HCLTECH.COM</a>	0120-4384000
2	Monika Chandiram	51501456	ICM	<a href="mailto:CHANDIRAMM@HCLTECH.COM">CHANDIRAMM@HCLTECH.COM</a>	0120-4384000
3	UTSAV SARAN	51390686	ICM	<a href="mailto:UTSAVSARAN@HCLTECH.COM">UTSAVSARAN@HCLTECH.COM</a>	0120-4384000
4	LUPA BARUAH	51446895	ICM	<a href="mailto:BARUAHL@HCLTECH.COM">BARUAHL@HCLTECH.COM</a>	0120-4384000
5	Shikha Tiwari	40141079	ICM	<a href="mailto:SHIKHA.TIWARI@HCLTECH.COM">SHIKHA.TIWARI@HCLTECH.COM</a>	0120-4384000
6	Prakash Negi	52004069	ICM	<a href="mailto:PRAKASH_NEGI@HCLTECH.COM">PRAKASH_NEGI@HCLTECH.COM</a>	0120-4384000
7	Vidya Akkireddy	52224463	ICM	<a href="mailto:VIDYA.AKKIREDDY@HCLTECH.COM">VIDYA.AKKIREDDY@HCLTECH.COM</a>	0120-4384000
8	Smita Patitundi	51854229	ICM	<a href="mailto:SMITAP@HCLTECH.COM">SMITAP@HCLTECH.COM</a>	0120-4384000
9	Lovely Bibra	40100020	PO	<a href="mailto:LOVELYB@HCLTECH.COM">LOVELYB@HCLTECH.COM</a>	0120-4384000
10	SEEMA GOEL	40100257	PO	<a href="mailto:SEEMAM@HCL.COM">SEEMAM@HCL.COM</a>	0120-4384000
11	Anandita Chauhan	51842209	PO	<a href="mailto:ANANDITA.CHAUHAN@HCLTECH.COM">ANANDITA.CHAUHAN@HCLTECH.COM</a>	0120-4384000
12	Reshmi Jacob	52149398	PO	<a href="mailto:RESHMI.JACOB@HCLTECH.COM">RESHMI.JACOB@HCLTECH.COM</a>	0120-4384000
13	Barsha Mishra	52182409	PO	<a href="mailto:BARSHA.MISHRA@HCLTECH.COM">BARSHA.MISHRA@HCLTECH.COM</a>	0120-4384000
14	Mona Jain	40101332	ICM	<a href="mailto:MONAJ@HCLTECH.COM">MONAJ@HCLTECH.COM</a>	0120-4384000
15	Anita Sabhnani Mehra	40105182	ICM	<a href="mailto:ANITAS@HCLTECH.COM">ANITAS@HCLTECH.COM</a>	0120-4384000
16	Navneet Kaur	40107342	ICM	<a href="mailto:KAUR.NAVNEET@HCL.COM">KAUR.NAVNEET@HCL.COM</a>	0120-4384000
17	Vishal Sharma	40109162	ICM	<a href="mailto:VISHAL.SHARMA@HCLTECH.COM">VISHAL.SHARMA@HCLTECH.COM</a>	0120-4384000
18	DEEPIKA GOYAL	40114932	ICM	<a href="mailto:DEEPIKAG@HCLTECH.COM">DEEPIKAG@HCLTECH.COM</a>	0120-4384000

19	Ankita Sood	40138509	ICM	<a href="mailto:ANSOOD@HCLTECH.COM">ANSOOD@HCLTECH.COM</a>	0120-4384000
20	Rati Mehrotra	40156239	ICM	<a href="mailto:RATIMEHROTRA@HCLTECH.COM">RATIMEHROTRA@HCLTECH.COM</a>	0120-4384000
21	Aparna Arya	40157509	ICM	<a href="mailto:APARNA@HCLTECH.COM">APARNA@HCLTECH.COM</a>	0120-4384000
22	SHILPA SOOD	40177549	ICM	<a href="mailto:SHILPA.SOOD@HCLTECH.COM">SHILPA.SOOD@HCLTECH.COM</a>	0120-4384000
23	Vikash Kumar	51325331	ICM	<a href="mailto:VIKASH.KUMAR1@HCL.COM">VIKASH.KUMAR1@HCL.COM</a>	0120-4384000
24	Vivek Sateerja	51356032	ICM	<a href="mailto:VIVEK.SATEEJA@HCLTECH.COM">VIVEK.SATEEJA@HCLTECH.COM</a>	0120-4384000
25	Sujeet Lahiri	51407454	ICM	<a href="mailto:SUJEETLAHIRI@HCLTECH.COM">SUJEETLAHIRI@HCLTECH.COM</a>	0120-4384000
26	Kunal Kaushik	51521733	ICM	<a href="mailto:KUNAL.KAUSHIK@HCLTECH.COM">KUNAL.KAUSHIK@HCLTECH.COM</a>	0120-4384000
27	Monika Gupta	51576673	ICM	<a href="mailto:MONIKA.GUPTA@HCLTECH.COM">MONIKA.GUPTA@HCLTECH.COM</a>	0120-4384000
28	Bhavna Kapur	51606974	ICM	<a href="mailto:BHAVNA.K@HCLTECH.COM">BHAVNA.K@HCLTECH.COM</a>	0120-4384000
29	Vikash Upadhyay	51870920	ICM	<a href="mailto:VIKASH.UPADHYAY@HCLTECH.COM">VIKASH.UPADHYAY@HCLTECH.COM</a>	0120-4384000
30	Sona Shukla	51945867	ICM	<a href="mailto:SONA.SHUKLA@HCLTECH.COM">SONA.SHUKLA@HCLTECH.COM</a>	0120-4384000
31	Vaishali Jain	52098270	ICM	<a href="mailto:VAISHALI_JAIN@HCLTECH.COM">VAISHALI_JAIN@HCLTECH.COM</a>	0120-4384000
32	Aditi Arora	52121930	ICM	<a href="mailto:ADITI_ARORA@HCLTECH.COM">ADITI_ARORA@HCLTECH.COM</a>	0120-4384000
33	Sumita Rautela	52126458	ICM	<a href="mailto:SUMITASINGH.RAUTEA@HCLTECH.COM">SUMITASINGH.RAUTEA@HCLTECH.COM</a>	0120-4384000
34	DIVYA GOEL	40211232	ICM	<a href="mailto:DIVYAGOE@HCLTECH.COM">DIVYAGOE@HCLTECH.COM</a>	0120-4384000
35	Ruchira Dhar	51478452	ICM	<a href="mailto:RUCHIRA.D@HCLTECH.COM">RUCHIRA.D@HCLTECH.COM</a>	0120-4384000
36	DEVIKA JOHARI	51310616	ICM	<a href="mailto:DEVIKAJ@HCLTECH.COM">DEVIKAJ@HCLTECH.COM</a>	0120-4384000
37	Puneet Popli	52180366	ICM	<a href="mailto:PUNEET.POPLI@HCL.COM">PUNEET.POPLI@HCL.COM</a>	0120-4384000
38	Mandavi Sharma	51439099	ICM	<a href="mailto:MANDAVI.S@HCLTECH.COM">MANDAVI.S@HCLTECH.COM</a>	0120-4384000
39	Namrata Sinha	51674461	ICM	<a href="mailto:NAMRATA_SI@HCLTECH.COM">NAMRATA_SI@HCLTECH.COM</a>	0120-4384000
40	Bhupesh Jaiswal	51975363	ICM	<a href="mailto:BHUPESH_JAISWAL@HCLTECH.COM">BHUPESH_JAISWAL@HCLTECH.COM</a>	0120-4384000

41	Priyanka Bijolia	52181971	ICM	<a href="mailto:p-priyanka2@hcltech.com">p-priyanka2@hcltech.com</a>	0120-4384000
42	Gunjan Goyal	52048308	ICM	<a href="mailto:gunjan.goyal@hcltech.com">gunjan.goyal@hcltech.com</a>	0120-4384000
43	Swati Kishore	51375653	ICM	<a href="mailto:swatikishore@hcl.com">swatikishore@hcl.com</a>	0120-4384000
44	SASHA Representative	NA	EM	<a href="mailto:contact@sashaindia.com">contact@sashaindia.com</a>	0120-4384000

## Pune

List of Presiding Officers, Internal Committee and External members for the above mentioned location is given below:

Total No of Presiding Officers	3 nos
Total Internal Committee Members	5 nos
External Members	1 no

S No	Name	SAP ID	Status	E mail ID	Contact No
1	MONIKA RAWAT	51465631	ICM	<a href="mailto:MONIKA_R@HCLTECH.COM">MONIKA_R@HCLTECH.COM</a>	020-40284444
2	SOMA BOSE	51793723	ICM	<a href="mailto:SOMA.BOSE@HCLTECH.COM">SOMA.BOSE@HCLTECH.COM</a>	020-40284444
3	Swarnalatha Mouli	51912379	PO	<a href="mailto:SWARNALATHA.S@HCLTECH.COM">SWARNALATHA.S@HCLTECH.COM</a>	020-40284444
4	Reshmi Jacob	52149398	PO	<a href="mailto:RESHMI.JACOB@HCLTECH.COM">RESHMI.JACOB@HCLTECH.COM</a>	020-40284444
5	Barsha Mishra	52182409	PO	<a href="mailto:BARSHA.MISHRA@HCLTECH.COM">BARSHA.MISHRA@HCLTECH.COM</a>	020-40284444
6	Shini Pious	40192847	ICM	<a href="mailto:SHINI.PIOUS@HCLTECH.COM">SHINI.PIOUS@HCLTECH.COM</a>	020-40284444
7	Samved Galegaonkar	51669940	ICM	<a href="mailto:SAMVED.GALEGAONKAR@HCLTECH.COM">SAMVED.GALEGAONKAR@HCLTECH.COM</a>	020-40284444
8	Shridha Gupta	51855836	ICM	<a href="mailto:SHRIDHAG@HCLTECH.COM">SHRIDHAG@HCLTECH.COM</a>	020-40284444
9	SASHA Representative	NA	EM	<a href="mailto:contact@sashaindia.com">contact@sashaindia.com</a>	020-40284444

## Vijayawada and all other locations in the State of Andhra Pradesh

List of Presiding Officers, Internal Committee and External members for the above-mentioned location is given below:

Total No of Presiding Officers	2 nos
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Total Internal Committee Members	5 nos
External Members	1 no

S No	Name	SAP ID	Status	E mail ID	Contact No
1	SHINI PIOUS	40192847	ICM	SHINI.PIOUS@HCLTECH.COM	8664586000
2	Reshmi Jacob	52149398	PO	RESHMI.JACOB@HCLTECH.COM	8664586000
3	Barsha Mishra	52182409	PO	BARSHA.MISHRA@HCLTECH.COM	8664586000
4	Shiva Prasad	51858890	ICM	SHIVA.PRASAD@HCLTECH.COM	8664586000
5	Suneet Chowdhury	51434366	ICM	SUNEET.CHOWDHURY@HCLTECH.COM	8664586000
6	Bharathi Yedduri	51978687	ICM	BHARATHI.YEDDURI@HCLTECH.COM	8664586000
7	Rajesh Sunkara	52064207	ICM	RAJESH.SUNKARA@HCLTECH.COM	8664586000
8	SASHA Representative	NA	EM	contact@sashaindia.com	8664586000

**Kochi, Thiruvananthapuram and all other locations in the State of Kerala**

**List of Presiding Officers, Internal Committee and External members for the above-mentioned location is given below:**

Total No of Presiding Officers	02 nos
Total Internal Committee Members	05 nos
External Members	1 no

S No	Name	SAP ID	Status	E mail ID	Contact No
1	SHINI PIOUS	40192847	ICM	SHINI.PIOUS@HCLTECH.COM	080-39610000
2	Reshmi Jacob	52149398	PO	RESHMI.JACOB@HCLTECH.COM	080-39610000
3	Barsha Mishra	52182409	PO	BARSHA.MISHRA@HCLTECH.COM	080-39610000
4	Vinoy Koramvalyath	52075198	ICM	VINOY.KORAMVALYATH@HCLTECH.COM	080-39610000
5	Sushi Unnikrishnan	52076896	ICM	SASI.UNNIK@HCLTECH.COM	080-39610000
6	Lakshmi Kanth Srinivasan	40138346	ICM	LAKSHMIKANTHS@HCLTECH.COM	080-39610000
7	Keerthana V	52257014	ICM	KEERTHANA.V@HCLTECH.COM	080-39610000
8	SASHA Representative	NA	EM	contact@sashaindia.com	080-39610000

**Chandigarh and all other locations in the State of Punjab**

**List of Presiding Officers, Internal Committee and External members for the above-mentioned location is given below:**

Total No of Presiding Officers	03 nos
Total Internal Committee Members	05 nos
External Members	1 no

S No	Name	SAP ID	Status	Email	Contact
1	Sheetal Dadhwal	52275441	PO	sheetal-dadhwal@hcltech.com	0172-4691113
2	Barsha Mishra	52182409	PO	BARSHA.MISHRA@HCLTECH.COM	0172-4691113
3	Reshmi Jacob	52149398	PO	RESHMI.JACOB@HCLTECH.COM	0172-4691113
4	Harvinder Singh	52275578	ICM	harvindarsi@hcltech.com	0172-4691113
5	Harmeet Arora	52275410	ICM	harmeet-arora@hcltech.com	0172-4691113
6	Swati Taneja	52275499	ICM	s.swati1@hcltech.com	0172-4691113
7	Ankur Goyal	52275568	ICM	ankur-goyal@hcltech.com	0172-4691113
8	Kiran Singh	52275540	ICM	mayanglambam.singh@hcltech.com	0172-4691113
9	SASHA Representative	NA	EM	contact@sashaindia.com	0172-4691113

## Enquiry into Complaint

In cases where there is a prima facie case made out, the IC will forward the complaint to police within 7 days for registering a criminal case based on the relevant Local Law applicable (New S. 79 Bharatiya Nayaya Sanhita, 2023).

The IC shall have the same powers as vested to Civil Court under the CPC w.r.t. summoning & enforcing attendance, examining on oath, requiring discovery & production of documents and such other matters.

The enquiry proceedings shall be detailed in writing & duly signed. The committee shall not be recording the enquiry proceedings in audio / video format ordinarily & attendees of the enquiry proceedings (including complainant and witnesses) are also expected not to record the same. Devices capable of recording shall be prohibited at the venue of enquiry and may be allowed at the discretion of the IC.

## What is expected from every employee?

If you are a victim or witness to any form of Sexual harassment, you must submit your grievance in the Global Ethics Helpline (Path: MyHCLTech >>Top Ribbon (Main Menu)>> Ethics Helpline). Employees based out of Germany/Netherlands shall continue to use the Smart Service Desk for SECURE complaints/write to [secure@hcltech.com](mailto:secure@hcltech.com) and/or report harassment to a supervisor or HR representative or members of the IC within 3(three) months from its occurrence. Complaints filed after a period of three months shall not be entertained except for in extraordinary circumstances. The determination of the fact that extraordinary circumstances exist shall be made on case to case basis. Under no circumstances, the extended time limit shall exceed three months.

- The complaint has to be filed with the Committee in written, along with supporting documents / substantiations and the details of the witnesses.
- Ordinarily, on receipt of the complaint, the Committee shall send to the respondent within a period of seven working days a copy of the complaint filed by the complainant. The respondent shall file his reply to the complaint along with his list of documents/ substantiations and the Details of the witnesses, within the stipulated time period.

## Conciliation

The aggrieved person may also choose to resort to Conciliation. On the request made by the aggrieved person, before initiating the inquiry, the IC will take steps to settle the matter through conciliation. No monetary settlement shall be made as a basis of conciliation. IC shall record the settlement and forward the conciliation report to the employer to take action. IC will provide copies of the settlement to the aggrieved person and respondent and no further inquiry shall be conducted. The settlement terms will need to be duly implemented or else enquiry will need to be initiated.

## 1. Procedure for dealing with complaints

In case no settlement is arrived at between parties or the terms of settlement have not been complied with by the respondent or basis the severity of the complaint the Committee shall inquire into the complaint in accordance with the service rules and Principles of Natural Justice. The parties shall be given reasonable opportunity of being heard.

The Committee shall have the right to terminate the inquiry proceedings or to give an ex-parte decision on the complaint (after giving 15 days advance notice), if the complainant or respondent fails, without sufficient cause, to present herself or himself for three consecutive hearings convened by the Chairperson. 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 Committee.

In conducting the inquiry, a minimum of three Members of the Committee including the Presiding Officer shall be present. The parties shall be given reasonable opportunity of being heard and a copy of the findings by the IC shall be made available to them. The inquiry would ordinarily be concluded within a maximum of 90 days of the receipt of the formal written complaint by the IC. Inadvertently in case the time limit of 90 days is exceeded, the same will be clearly explained in the final report submitted by the IC.

## 2. Actions during pendency of Enquiry (Interim Relief) -

Not with standing the company's internal procedure, every employee retains the right to file a complaint of unlawful harassment under the law of the land with relevant authorities.

In relevant cases, in accordance with the mandate of the law of the land, the company retains the right and responsibility to hand over the investigation or employee to relevant state authorities.

During the pendency of an Inquiry, IC may recommend to

1. Transfer the aggrieved person or the respondent to any other workplace; or
2. Grant leave to the aggrieved person up to a period of 3 months; Leave granted shall be in addition to the leave otherwise entitled; or
3. Grant such other relief to the aggrieved person or the respondent as may be prescribed.

Interim relief is not a right that can be demanded by the complainant. The complainant must make a written request at the time of filing or during the inquiry stage to the Internal Committee. The IC, based on its decision, will grant or deny such relief. The IC after due consideration of the case situation or the environment at work place, can independently take any such decision to grant interim relief.

The Complainant at any stage of the enquiry may exercise her right to withdraw the complaint by showcasing reasonable cause. However, In view of the company's stance of zero tolerance, In certain cases the company may exercise its rights to pursue a complaint despite being withdrawn by the complainant.

### **3. On Conclusion of Inquiry -**

- IC will provide a report of its findings within 10 days from the date of completion of inquiry and such report may be made available to the concerned parties.
- The parties may submit within the stipulated time their representation if any on the findings of the committee. After considering the representation, the IC shall submit the report to the employer / HR
- In the cases where the allegations are proved against the respondent, the Committee shall recommend to the employer to take any following actions: including a written apology, warning, reprimand or censure, withholding of promotion, withholding of pay rise or increments, recommending transfer to a different location, terminating/separating/exiting the respondent from service, recommending not to be rehired or undergoing a counselling session, sensitisation on Secure policy and Gender Sensitisation or carrying out community service. The employer is required to act upon the recommendation within 60 days of its receipt of report sent by the IC.

### **4. False Accusation**

Where the IC arrives at the conclusion that the allegation against the respondent is malicious or the aggrieved person or any other person making the complaint has made the complaint knowing it to be false or the aggrieved person or any other person making the complaint has produced any forged or misleading document, it may recommend to the employer to take suitable action against such person viz. including a written apology, warning, reprimand or censure, withholding of promotion, withholding of pay rise or increments, recommending not to be rehired, terminating/separating/exiting such person to be separated from the organisation, terminating the perpetrator from service or undergoing a counselling session, sensitisation on Secure policy and Gender Sensitisation or carrying out community service.

This does not, however, include complaints which are difficult to prove or have been made in good faith.

### **5. Right to appeal**

Any person aggrieved from the recommendations made may prefer an appeal to the court or tribunal, within the stipulated period in accordance with the manner as may be prescribed, without prejudice to provisions contained in any other law for the time being in force.

### **6. Confidentiality**

All complaints of Harassment, statements of parties and subsequent investigations and reports, are considered highly confidential and would not be disclosed, except to the extent required by law. While handling any complaint under this policy shall attempt to the greatest degree possible to protect the confidentiality of the persons involved, the investigations, related records and reports. Any attempts to influence or pressurize persons connected with the Inquiry, whether as participants, or witnesses, or even members of the Inquiry committee, shall considered as a misconduct under the disciplinary policy of the company.

### **7. Reference of prevailing Laws**

This policy is meant to confirm to The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act and Rules 2013: An act to provide protection against sexual harassment of women at workplace and for the prevention and redressal of complaints of sexual harassment and for matters connected therewith or incidental thereto.

"Sexual harassment includes any one or more of the following unwelcome acts or behaviour (whether directly or by implication) as: (a) physical contact and advances; (b) a demand or request for sexual favours; (c) sexually-coloured remarks; (d) showing pornography; (e) any other unwelcome physical, verbal or non-verbal conduct of sexual nature.

For more clarity reference is being made to the Supreme Court Judgment in the Vishakha case: "Where any of these acts is committed in circumstances where under the victim of such conduct has a reasonable apprehension that in relation to the victim's employment or work whether she is drawing salary, or honorarium or voluntary, whether in government, public or private enterprise such conduct can be humiliating and may constitute a health and safety problem.

It is discriminatory for instance when the aggrieved person has reasonable grounds to believe that the person's objection would disadvantage that person in connection with their employment or work including recruiting or promotion or when it creates a hostile work environment. Adverse consequences might be visited if the victim does not consent to the conduct in question or raises any objection thereto."

If this policy contravenes any of the sections / laws applicable then The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act and Rules 2013 will supersede this policy.

## Policy Statement

HCL America Inc. is committed to providing a work environment free from sexual harassment and all forms of discrimination, including harassment based on pregnancy, childbirth or related medical conditions, race, religious creed, color, national origin or ancestry, physical or mental disability, medical condition, marital status, age, sexual orientation, gender identification, or any other basis protected by federal, state, or local law or ordinance or regulation.

All employees, including directors, officers, and consultants, are required to comply with this policy and behave in a manner that upholds the dignity of every individual in the workplace.

### Definition of Sexual Harassment

Sexual harassment includes harassment based on sex, sexual orientation, gender identity, and the status of being transgender. It encompasses unwelcome conduct that is of a sexual nature or directed at an individual because of that individual's sex when:

1. **It interferes with an individual's work performance** or creates an intimidating, hostile, or offensive work environment, even if the individual is not the intended target.
2. **It is made a condition of employment**, either explicitly or implicitly.
3. **Submission to or rejection of such conduct** is used as the basis for employment decisions affecting the individual.

### Examples of Sexual Harassment

- **Physical Assaults of a Sexual Nature:**
  - Touching, pinching, patting, grabbing, poking, molesting, or brushing against someone's body
- **Unwanted Sexual Advances or Propositions:**
  - Requests for sexual favors accompanied by implied or overt threats concerning job performance evaluations, promotions, or other job benefits or detriments
  - Subtle or obvious pressure for unwelcome sexual activities
- **Sexually Oriented Gestures or Remarks:**
  - Comments, jokes, gestures, or noises about a person's sexuality or sexual experiences that create a hostile work environment
- **Display of Sexual Content:**
  - Displaying pictures, posters, calendars, graffiti, objects, promotional material, reading materials, or other materials that are sexually demeaning or pornographic
  - Displays on workplace computers or cellphones and sharing such displays while in the workplace

• **Hostile Actions:**

- Interfering with, destroying, or damaging a person's workstation, tools, or equipment or otherwise interfering with the individual's ability to perform the job.
- Bullying or name-calling



**Physical Assaults Of A Sexual Nature**



**Unwanted Sexual Advances**



**Sexually Oriented Gestures**



**Display Of Sexual Content**



**Hostile Actions**

**Where Sexual Harassment Can Occur?**

Unlawful sexual harassment is not limited to the physical workplace. It can occur while employees are traveling for business or at employer-sponsored events or parties. Calls, texts, emails, and social media usage by employees can constitute unlawful workplace harassment, even if they occur away from the workplace premises or not during work hours.

**Employee Responsibility**

- **Compliance:** All employees are required to comply with the company's policy prohibiting sexual harassment.
- **Professional Behavior:** Employees should behave in a way that fosters a work environment that promotes, respects, and upholds the dignity of every individual at the workplace.
- **Familiarization:** Employees should read and acquaint themselves with this policy and clear any doubts with their local HR representative.
- **Direct Communication:** As a first step, employees are encouraged to deal directly and ask the person causing harassment to stop the unwelcome behavior.
- **Reporting:** If such efforts are not successful, or at the same time, employees may report the perceived harassment through the official channels mentioned in this policy.
- **Cooperation:** Employees are expected to cooperate with the company in investigations and in preventing and curtailing unlawful discrimination and harassment at the workplace.

**Supervisory Responsibilities**

- **Mandatory reporting:** All supervisors and managers who receive a complaint or information about suspected sexual harassment, observe what may be sexually harassing behavior, or for any reason, suspect that sexual harassment is occurring, are required to report such suspected sexual harassment to [hcltech.com](http://hcltech.com).
- **Disciplinary action:** Supervisors and managers will be subject to discipline for failing to report suspected sexual harassment, or otherwise participating in or knowingly allowing sexual harassment to continue.
- **Retaliation prohibited:** Supervisors and managers must not engage in any form of retaliation.

**Legal Protections and External Remedies**

Sexual harassment is prohibited by HCLTech America Inc. and by federal, state, and local laws. Employees may choose to pursue legal remedies with the following governmental agencies at any time.

• **New York State Division of Human Rights (DHR):**

- The New York State Human Rights Law (HRL), codified as N.Y. Executive Law, Article 15 (§ 290 et seq.), applies to employers in New York State and protects employees, paid or unpaid interns, and non-employees regardless of immigration status.
- **Timeframe:** Complaints with DHR may be filed at any time within one year of the harassment.

- **Court Action:** DHR will file the complaint with the EEOC to preserve the right to proceed in federal court. If an individual did not file at DHR, they can sue directly in state court under the HRL within three years of the alleged discrimination.
- **United States Equal Employment Opportunity Commission (EEOC):**
  - The EEOC enforces federal anti-discrimination laws, including Title VII of the Civil Rights Act of 1964, codified as 42 U.S.C. § 2000e et seq.
  - **Timeframe:** An individual can file a complaint with the EEOC anytime within 300 days of the harassment.
  - **Contact Information:**
    - Phone: 1-800-669-4000 (TTY: 1-800-669-6820)
    - Email: [info@eeoc.gov](mailto:info@eeoc.gov)
    - Website: [www.eeoc.gov](http://www.eeoc.gov)

#### Responsibility Holders and Contact Officers

For reporting and assistance, you may contact any of the following members:

- **Secure Governance Council Members:**
  - **Ramachandran Sundararajan**
    - Email: Ramachandran.S@hcltech.com
  - **C Vijayakumar**
    - Email: vijaykumarc@hcltech.com
  - **Subrat Chakravarty**
    - Email: subrat.chakravarty@hcltech.com
  - **Amrita Das**
    - Email: AmritaD@hcltech.com
  - **Ranganathan Venkatachalam**
    - Email: ranganathan\_v@hcltech.com
  - **Annie Sundararaj**
    - Email: annie.s@hcltech.com
  - **Jeetendra Kumar Sharma**
    - Email: jeetenderakumar.s@hcltech.com
- **Other Members of the Secure Panel:**
  - **Debasis Sarkar**
    - Email: Debasis\_S@hcltech.com
  - **R. Anand**
    - Email: RAnand@hcltech.com
  - **Kiran SN**
    - Email: Kiran.SN@hcltech.com
- **USA Representatives:**
  - **Sunil Khanna**
    - Email: Skhanna@hcltech.com
  - **Atul Jain (HR)**
    - Email: atjain@hcltech.com
  - **Binumon John**
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  - **Santhosh Sequeira**
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  - **Sundar Rajan**
    - Email: Sundarr@hcltech.com
- **Secure Panel Members From Sales:**
  - **Ramachandran Sundararajan**
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  - **Sayantana Basu**
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## Policy Statement

The purpose of this policy is to articulate the measures that must be in place to prevent and resolve conflicts arising from sexual and/or gender-based harassment, guaranteeing the right to invoke it and safeguarding the rights of the personnel affected within a context of prudence and confidentiality, processing with due consideration, seriousness and speed the complaints filed internally within the company.

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## Policy Statement

### Workplace

For the purposes of this policy, the "or" „ at work" is not confined or limited to the actual working place of the employees in the sense of the physical space in which paid work may be performed as per the prescribed duty hours." Workplace" or "at work" would include inter alia office parties, work-related social functions, phone calls, sending messages through cellular phones or email from home even on an off day, or other contacts outside office hours and work-related interactions. Thus, it is not the physical workplace that would govern, but the "access" that a perpetrator has to the recipient of sexually harassing behavior by virtue of a job situation or relation that is relevant.

### Definition of Sexual Harassment

You may be experiencing sexual harassment when one of the following is true:

- It is stated or understood that you must submit to the behaviour in order to get or keep a job
- Employment decisions are based on whether or not you go along with the behaviour, or
- The behavior creates a hostile or abusive work atmosphere that changes the conditions of your job Sexual harassment could be:
- "Quid pro quo" (this for that) harassment occurs when decisions regarding employment are promised, threatened or given, based upon whether or not one or more employees will submit to sexually oriented conduct. Quid pro quo sexual harassment is far broader. In a quid pro quo situation, the sexual behavior does not have to be physical. For example, a supervisor might give the best work assignments to employees who don't spurn his/her sexually-oriented behavior and may penalize those who spurn such advances. "Hostile environment" sexual harassment occurs where the sexually-oriented conduct of one employee creates

an offensive and unpleasant working environment for any other employee. Harassment is often about one person (or a group of people) using power inappropriately over another person/group of people. But harassment can also happen between people when there is no power relationship. It may simply create a hostile environment.

## Employee Responsibility

Employees of HCLTech must conduct themselves so as to ensure a work environment that promotes, respects and upholds the dignity of every individual at the workplace and does not become the cause of unlawful harassment. This term and act of "unlawful harassment" includes but is not restricted to unwelcome behaviour whether through visual displays, verbal, non-verbal, physical or other conduct making a person submit to requests, favours, threats or demands that alter or threaten to alter the terms of employment and interfere with work conditions.

All employees must read and acquaint themselves with the company policy to deal with sexual harassment at the workplace and clear any doubts they have with their local HR representative.

As a first step, employees are encouraged to deal directly and ask the person causing harassment to stop the unwelcome behavior. If such efforts are not successful, employees must report every incident of perceived harassment that they are aware of through the official channels at the tool available namely Global Ethics Helpline ([GEH](#)) ([GlobalEthicsHelpline - index \(sharepoint.com\)](#)) All complaints relating to sexual harassment at workplace can be filed online through this tool. Further any queries, if needed, to be discussed can be sent to [secure@hcl.com](mailto:secure@hcl.com).

**However please note that any complaints of incidents of sexual harassment at workplace will only be accepted on Global Ethics Helpline.** Complainants who are not employees of the company and not having any relationship with the organisation however is an aggrieved party and is expected to raise a complaint by visiting [www.hcltech.com](http://www.hcltech.com)- raise a grievance ([Tool for Employee Grievances & Campaign for Ethics | HCLTech](#)).

Employees must cooperate with the company in investigations and in preventing and curtailing unlawful discrimination and harassment at the workplace.

A detailed document on Sexual Harassment at workplace is available at Policies Hub or with any HR officer.

## False Accusations

In case the Governing Council is of the opinion that the complaint was false and malicious, appropriate disciplinary action up to termination could be taken against the complainant. A detailed reasoning for having reached the above said conclusion shall be submitted. This does not, however, include complaints which are difficult to prove or have been made in good faith but do not constitute sexual harassment per say.

## Right to appeal

Employees dissatisfied with the actions taken by the management can file an appeal with the Chief People Officer (CPO-Head of HR function) within 14 working days if they feel that principles of natural justice have not been followed.

## Prevention and Redressal of Harassment at HCL Technologies

HCLTech and its group companies ("the Group") are committed to providing an environment free of unlawful harassment. This policy prohibits sexual harassment and harassment based on pregnancy, childbirth or related medical conditions, race, religious creed, color, national origin, or ancestry, physical or mental disability, medical condition, marital status, age, sexual orientation, or any other basis protected by federal, state, or local law or ordinance or regulation. All such harassment is unlawful.

This policy applies to all persons involved in the operation of the Group and prohibits unlawful harassment from/to any employee of the Companies towards from/to other employees including supervisors, vendors, and clients. It also prohibits unlawful harassment based on the perception that anyone has any of the abovementioned prohibited characteristics or is associated with a person who has or is perceived as having any of those characteristics.

## What is expected from every employee?

- If you believe that you have been unlawfully harassed, submit a complaint to your own supervisor or any other supervisor, or the Human Resources Manager of the Company as soon as possible after the incident. You may also report your complaint to the committee responsible for addressing grievances against harassment called Secure. You can register your complaint at [Global](#)

## [Ethics Helpline.](#)

We encourage you to report all facts of the incident/s. It is imperative that you bring the matter to the Company's attention promptly so that any concern of discrimination, retaliation or harassment can be investigated and addressed promptly and appropriately.

In cases of sexual harassment, you can lodge your complaint immediately to Global Ethics Helpline.

- a. You have 3 (three) months to lodge a complaint from the date of occurrence of the incident of sexual harassment at workplace This period is applicable for all Geos except Australia & New Zealand.
- b. Please note that the timeline for raising the grievances under the Australia and New Zealand – Employment Relations (Extended Time for Personal Grievance for Sexual Harassment) Amendment Bill (Bill) is 12 months from the occurrence of the last incident.
- c. In Australia, the time period within which an investigation would ordinarily to be concluded is within 45 (forty-five) working days of the receipt of the formal written complaint by the aggrieved party/complainant.
- If you notice or happen to receive good faith information on harassment to a third party, then you need to report this to your supervisor or the Human Resource Manager.

If the Company determines that unlawful harassment has occurred, effective remedial action will be taken in accordance with the circumstances involved. Any employee determined by the Company to be responsible for unlawful harassment will be subject to appropriate disciplinary action, up to, and including termination. The Company will not retaliate against you for filing a complaint and will not tolerate or permit retaliation by management, employees or co-workers. Please ensure that you read and acquaint yourself with this policy. If you have any questions relating to what constitutes discrimination or harassment, or if you have any other questions or concerns pertaining to discrimination or harassment, please do not hesitate to contact your local Human Resources team. The company will file the case and investigate into it from the date of occurrence and in accordance with their local laws in the specific Geo.

Apart from this, the **Office of the Secure** consists of Ranganathan Venkatachalam, [ranganathan\\_v@hcl.com](mailto:ranganathan_v@hcl.com), Annie Sundararaj, [annie.s@hcl.com](mailto:annie.s@hcl.com) and Barsha Mishra [barsha.mishra@hcl.com](mailto:barsha.mishra@hcl.com).

## Responsibility holders and contact officers in the Secure

### Members of Secure Governance council –

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1	Ramachandran Sundararajan	<a href="mailto:Ramachandran.S@hcl.com">Ramachandran.S@hcl.com</a>
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## Contacts in each location-

### Other Members of the Secure panel

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## Sexual Harassment at the Workplace – Important Details for Employees

In making our work atmosphere healthier and free from harassment, the Company has made the Rules Prohibiting Sexual Harassment at the Workplace. Conduct that might be harmless or even enjoyable in a social situation can be upsetting at work. Sexual behavior that is repeated, unwanted and interferes with your job has crossed the line: it is not only inappropriate, but also illegal.

For example, if a co-worker accidentally brushes against you, it would not be considered sexual harassment. However, if that person repeatedly finds opportunities to brush against you, it is no longer accidental -- it is deliberate. Behavior like this, which may make you feel uncomfortable and adversely affect your work, is sexual harassment.

Some behavior may be so extreme - such as sexual assault - that it constitutes sexual harassment even if the behavior occurs only once.

## What is Sexual Harassment?

You are experiencing sexual harassment when one of the following is true.

- It is stated or understood that you must submit to the behavior in order to get or keep a job
- Employment decisions are based on whether or not you go along with the behavior, or
- The behavior creates a hostile or abusive work atmosphere that changes the conditions of your job
- Sexual harassment could be:
- "Quid pro quo" (this for that) harassment occurs when decisions regarding employment are promised, threatened or given, based upon whether or not one or more employees will submit to sexually-oriented conduct. Quid pro quo sexual harassment is far broader. In a quid pro quo situation, the sexual behavior does not have to be physical. For example, a supervisor might give the best work assignments to employees who don't spurn his/her sexually oriented behavior and may penalize those who spurn such advances.

"Hostile environment" sexual harassment occurs where the sexually oriented conduct of one employee creates an offensive and unpleasant working environment for any other employee. Harassment is often about one person (or a group of people) using power inappropriately over another person/group of people. But harassment can also happen between people when there is no power relationship. It may simply create a hostile environment.

## Types of behavior which can be considered as sexual harassment.

Depending on the circumstances, each of the following kinds of behavior may be sexual harassment:

- Material that is sexual in nature, sexist, sexually explicit and so on 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.
- Verbal abuse or comments that put down people because of their sex.
- Comments about people's (women/men) bodies
- Tales of sexual exploits
- Graphic descriptions of pornography
- Pressure for dates
- Sexually explicit gestures
- Unwelcome touching and hugging
- Sexist and insulting graffiti
- Sexist jokes and cartoons. There is a difference between harmless humor which may refer to gender, race and so on and using a racist, sexist or other type of stereotyping jokes to have a "dig" at someone (and therefore to harass them). If this difference is not clear or if someone is offended, the behavior should stop immediately.
- Obscene phone calls
- Displaying pornography in the workplace
- Insisting that workers wear revealing clothing
- Inappropriate gifts (for example, lingerie)
- Discussion of one's partner's sexual inadequacies
- Lewd and threatening letters
- "Accidentally" brushing sexual parts of the body.
- Pressing or rubbing up against a victim
- Sexual sneak attacks (such as grabbing private parts on the run)
- Indecent exposure
- Subtle or overt pressure for sexual favors
- Soliciting sexual services
- Demanding sexual services
- Sexual or physical contact, such as slapping, kissing or touching.
- Intrusive questions about sexual activity
- Sexual assault (a crime as well, of course, under the Indian Penal Code)
- Repeated sexual invitations when the person invited has refused/ignored similar invitations.
- Coerced sexual intercourse (e.g., as a condition of employment or academic status)

- In some cases, a single act may be enough to amount to harassment.

In some cases, a single act may be enough to amount to harassment.

### **If I think I have been sexually harassed, or am part of a hostile environment, what should I do?**

The first thing you should consider is filing your complaint at Global Ethics Helpline. Your Company cannot solve the problem if it is not aware of the problem. If you do file a complaint, be sure to follow up on it, to be sure that the Company is addressing the issue in a timely manner.

Many people who are harassed initially respond by trying to ignore the problem. But often, harassment grows worse when it is ignored. Here are some primary steps to deal with sexual harassment.

- Tell the harasser to stop. Make it clear you don't welcome this behavior. You can say this in person or in a letter sent by registered mail. Keep copies of any written correspondence.
- Follow the grievance procedures outlined in the company's Policy against Sexual Harassment. Remember that stopping sexual harassment is the responsibility of the employer as well as the harasser.
- Log a complaint with [Global Ethics Helpline](#), the members of Secure Governance Council or your contact officer in your locations. In case you do not have access to mails please send a Registered letter, courier, call or meet with them. Please note that anonymous complaints will not be taken up. If you choose to complain to your manager, he/she will ensure that the complaint is routed to the committee.
- Keep notes describing each incident, including date, time, place, what the harasser said or did, how you responded, who else might have heard or seen it and what you did at that time? Keep these notes at home. Also keep any gifts, notes or cartoons you've received from the harasser.
- Talk to others at work, even though it may be embarrassing. Be judicious about talking to your co-workers so you don't encourage gossip or possibly harmful actions by others. But you may find witnesses, allies or other victims of the harasser who will support you. It may be helpful to talk about the experience with friends and family as well.
- Keep copies of your employment record at home. Harassers sometimes try to defend themselves by attacking their victims' job performance.

### **Will the Rules apply to me if I am an employee who is working outside my home country?**

You will be subject to the Company's Policy Against Sexual Harassment (Overseas) Rules. Therefore, you will have to follow the procedure under those Rules.

### **To whom should I complain if I am in a customer site?**

You can approach the Contact Officer designated for your country or lodge your complaint with [Global Ethics Helpline](#).

### **Is Everything Related to Sex in the Workplace "Harassment"? What About Teasing?**

This is a difficult hard and fast rule to state. In the Indian context there are no decisions which set out the differential features between sexually oriented behavior and teasing/ sporadic events of indecency, etc. As a pointer to the probable differences, the following is the status in the USA, which has a fairly active law on this issue. However, it must be noted that this is not a statement as to the position of law in India or as to the probable interpretation that Indian courts may adopt.

In the USA, Sexual harassment is morally wrong and legally actionable. Most sexual harassment claims are made under Title VII of the Federal Civil Rights Act of 1964. It provides that "it shall be an unlawful employment practice for an employer to discriminate against any individual with respect to his compensation, terms, conditions, or privileges of employment, because of such individual's race, color, religion, sex, or national origin."

In a series of major decisions in 1998, the United States Supreme Court clarified and broadened the law. In a unanimous decision in March 1998 the Court said: "When the workplace is permeated with discriminatory intimidation, ridicule, and insult that is sufficiently severe or pervasive to alter the conditions of the victim's employment and create an abusive working environment, Title VII is violated."

The US Federal Equal Employment Opportunity Commission (EEOC) has defined sexual harassment as "unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature ... when ... submission to or rejection of such conduct is used as the basis for employment decisions... or such conduct has the purpose or effect of ... creating an intimidating, hostile or offensive working environment."

As the US Supreme Court reiterated in June 1998 "Sexual harassment under Title VII presupposes intentional conduct. The prohibition of harassment on the basis of sex forbids only behavior so objectively offensive as to alter the "conditions" of the victim's employment. In order to be actionable under the statute, a sexually objectionable environment must be both objectively and subjectively offensive, one that a reasonable person would find hostile or abusive, and one that the victim in fact did perceive to be so."

Courts in the US determine whether an environment is sufficiently hostile or abusive by "looking at all the circumstances," including the "frequency of the discriminatory conduct; its severity; whether it is physically threatening or humiliating, or a mere offensive utterance; and whether it unreasonably interferes with an employee's work performance."

The US Federal Civil Rights Act does not prohibit "genuine but innocuous differences in the ways men and women routinely interact with members of the same sex and of the opposite sex." A recurring point in the US Supreme Court's opinions is that "simple teasing," offhand comments, and isolated incidents (unless extremely serious) will not amount to discriminatory changes in the "terms and conditions of employment."

The Court's tests are designed to filter out complaints attacking "the ordinary tribulations of the workplace, such as the sporadic use of abusive language, gender-related jokes, and occasional teasing."

It may be noted that the acts of isolated teasing, sporadic abusive utterances, occasional sexually colored jokes, could often, more appropriately, be the subject of disciplinary action under the Company's rules for misconduct.

However, the absence of a clear-cut enunciation of the law on the difference between teasing/bad humor vis-à-vis sexually oriented behavior which may amount to harassment, should not be taken as a pretext to practice such teasing/bad humor. If this difference is not clear or if someone is offended, the behavior should stop immediately.

#### **If an employee yields to the demands/favour of sexual nature, does that make it consensual sex instead of harassment?**

No, not necessarily. If the sexual advances were "unwelcome", but the employee complied in order to keep his or her job; it is still considered harassment. However, if an ongoing relationship develops, it often becomes more difficult - as a matter of evidentiary proof - to convince the Secure Governance Council that the original advances were "unwelcome". It is therefore very important to file sexual harassment related issues on the Global Ethics Helpline tool at the earliest possible instance.

#### **What if there was a voluntary sexual relationship?**

The end of a voluntary sexual relationship may give rise to a situation alleging sexual relationship.

- A party may claim that the relationship was the result of quid pro quo harassment and was not the result of voluntary conduct or mutual attraction.
- Should one party try to continue the relationship, it is possible to have the other claim that the pursuing party is engaged in hostile environment sexual harassment
- It is also possible that there may be a spiteful action in the form of a hostile environment sexual harassment by either party because of the fallout between the parties.

In all these circumstances, it becomes a matter of proof, considering the facts and circumstances in determining whether there has been an incidence of sexual harassment.

#### **Can one incident constitute sexual harassment?**

In "quid pro quo" cases, a single sexual advance may constitute harassment if it is linked to the granting or denial of a tangible employment action, such as discharge, demotion or undesirable reassignment or other changes in employment or employment benefits.

In "hostile environment" cases, generally, a single incident does not create a "hostile environment."

A hostile environment claim usually requires showing of a pattern of offensive conduct; the more extreme the conduct, the less the need to show a repetitive series of incidents.

#### **Is an employer liable if an employee is harassed?**

If an employer is aware of a hostile environment and has not taken any appropriate action to correct the problem, then the employer may well be held liable for the harassment.

However, whether it was supervisors, co-workers, or customers who created the hostile environment, if the employer is not made aware of the situation, the employer should not be held responsible for hostile environment harassment.

## **What are my responsibilities as an employee?**

All employees including Directors, Officers and consultants are required to comply with the rules of the Company prohibiting sexual harassment. More specifically you are required to refrain from sexually oriented behavior while interacting with other employees. It may be noted that the acts teasing, sporadic abusive utterances, occasional sexually colored jokes, could upset a person, even though it may not have been intentionally directed at him/her, and may not form a sexual harassment claim. If the censurable behavior you are engaging in, is upsetting someone, stop it immediately and refrain from future indulgences in such behavior.

Additionally, you are required to report all incidents of sexually oriented behavior that you are aware of, to the appropriate persons.

## **If an employer wants an employee to dress in what is considered a "sexy" manner, is that sexual harassment?**

It could be. Employers may not discriminate against employees on the basis of sex. Asking you to dress in a provocative manner may involve both quid pro quo harassment and be part of creating a hostile environment. No employee should be required to be put in a position that encourages people (whether other employees or visitors, vendors, customers, or salespeople) to make unwelcome sexual advances.

## **Can my employer retaliate against me for filing a complaint?**

It is unlawful for an employer to retaliate against someone who files a charge of discrimination, participates in an investigation, or opposes discriminatory practices.

## **Retaliation by the employer/ Respondent/ by any other person related to the issue/ any Witness, any other colleagues.**

HCLTech is committed to providing an environment free of any and all kinds of harassment including sexual harassment, gender-based harassment, harassment related to special conditions like pregnancy, childbirth, harassment based on any kind of medical conditions, race, ethnicity, religious creed, color, national origin or ancestry, physical or mental disability, medical condition, marital status, age, sexual orientation, etc.

This policy applies to all persons engaged directly or indirectly with HCLTech and prohibits any kind of harassment of any employee of HCLTech or any person visiting or working with HCLTech including supervisors, vendors and clients. If the Company determines that harassment has occurred, appropriate remedial action shall be taken. Any employee determined by the Company to have caused any kind of harassment shall be dealt appropriate disciplinary action, up to, and including termination. The Company shall not retaliate against anyone for filing a complaint and shall not tolerate or permit retaliation by management, employees or co-workers.

Workplace Sexual harassment should not be ignored under any circumstances because silence or the act of ignoring towards the harassing incident conduct may be interpreted as acceptance of such incident or conduct. In making our work atmosphere healthier and free from harassment. The Company has some defined set of guidelines defined for employee; employer to make a work environment free from Harassment.

## **What are the local laws governing Sexual harassment? When I am outside my home country on a short official trip will these laws be applicable?**

### **Indian Law**

The Supreme Court has defined the term sexual harassment in the case of Vishaka and others v. State of Rajasthan as under: "Sexual harassment includes such unwelcome sexually determined behaviour (whether directly or by implication) as: (a) physical contact and advances; (b) a demand or request for sexual favours; (c) sexually coloured remarks; (d) showing pornography; (e) any other unwelcome physical, verbal or non-verbal conduct of sexual nature. Where any of these acts is committed in circumstances whereunder the victim of such conduct has a reasonable apprehension that in relation to the victim's employment or work whether she is drawing salary, or honorarium or voluntary, whether in government, public or private enterprise such conduct can be humiliating and may constitute a health and safety problem. It is discriminatory for instance when the woman has reasonable grounds to believe that her objection would disadvantage her in connection with her employment or work including recruiting or promotion or when it creates a hostile work environment. Adverse consequences might be visited if the victim does not consent to the conduct in question or raises any objection thereto."

**Other Geos shall abide by their local laws.**

## Policy Statement

The purpose of this policy is to articulate the measures that must be in place to prevent and resolve conflicts arising from sexual and/or gender-based harassment, guaranteeing the right to invoke it and safeguarding the rights of the personnel affected within a context of prudence and confidentiality, processing with due consideration, seriousness and speed the complaints filed internally within the company.

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## Process

### Reporting Procedures

- **Submitting a Complaint:**
  - **Written Complaint:** If you believe that you have been harassed, submit a written complaint to your supervisor and the Human Resources Manager as soon as possible after the incident.
  - **Oral Complaints:** You will be asked to submit the complaint in writing.
  - **Alternative Reporting:** If your supervisor is the alleged harasser, report to your skip-level manager.
  - **Email Reporting:** You may also report your complaint to [Secure@hcltech.com](mailto:Secure@hcltech.com)
  - **New York State Employees:** Fill out the complaint form and send it to [Secure@hcltech.com](mailto:Secure@hcltech.com)
- **Seeking Legal Remedies:**
  - **EEOC**
    - File a complaint with the **EEOC** anytime within 300 days of the harassment.
    - If the complaint is considered discrimination, the EEOC will issue a Right to Sue letter permitting the individual to file a complaint in federal court.
    - Federal courts may award remedies if discrimination is found to have occurred.
    - There is no cost to file a complaint with the EEOC.
  - **DHR**
    - If in New York, you can file with **DHR**, and if probable cause for discrimination is determined, cases are forwarded to a public hearing before an administrative law judge.

- If discrimination is found after a hearing, DHR has the power to award relief, such as requiring your employer to act to stop the harassment or redress the damage caused (paying monetary damages, attorney's fees and civil fines).
- You do not need an attorney to file a complaint with DHR, and there is no cost to file with DHR.
- **Third-Party Reporting:**
  - If you receive good faith information on harassment to a third party, you are strongly encouraged to report the harassment to your supervisor or the Human Resources Manager.
- **Cooperation in Investigations:**
  - You may be expected to cooperate with the company in investigations.

## Investigation Process

- **Initiation:**
  - Upon receipt of a complaint, the Secure Governing Council (SGC) will conduct a timely review of the allegations and take any interim actions as appropriate.
- **Steps:**
  - **Documentation:**
    - If documents, emails, or phone records are relevant to the allegations, take steps to obtain and preserve them.
  - **Review of Evidence:**
    - Request and review all relevant documents, including electronic communications.
  - **Interviews:**
    - Interview the parties involved, including any relevant witnesses.
  - **Recordkeeping:**
    - Create written documentation of the investigation, including a list of all documents reviewed and summaries of each, a list of those interviewed and a summary of each statement, a timeline of events, a summary of prior relevant incidents, and the resolution of the complaint with correlated corrective actions.
    - Keep the written documentation and associated documents in the employer's records.
  - **Resolution:**
    - Promptly notify the individual who complained that the matter has been resolved and implement corrective actions as appropriate.
- **Confidentiality:**
  - Investigations will be confidential to the extent possible.
- **No Retaliation:**
  - The company will not retaliate against you for filing a complaint and will not tolerate or permit retaliation by management, employees, or co-workers.

## Local Police Department

- Contact the local police department if the harassment involves physical touching, coerced physical confinement, or coerced sex acts, as the conduct may constitute a crime.



Documentation



Review Of Evidence



Interviews



Recordkeeping



Resolution



Confidentiality



No Retaliation

## Process

### Procedure for dealing with complaints.

The company has set up a Secure Governing Council (SGC) with senior employees under the leadership of the Head- Human Resources (HR) to look into this matter.

This committee also has an external expert to provide objectivity in all its proceedings, and will also take local help in the countries in which the Company operates on consultation basis.

For any grievances, employees must write to [secure@hcl.com](mailto:secure@hcl.com) and/or report harassment to a supervisor or HR representative or members of the SGC. In accordance with local laws governing such workplace harassments and company procedure, all complaints will be investigated fairly and any misconduct, intentional or otherwise will attract reformative and disciplinary action, including and upto termination of contract.

The investigation would ordinarily be concluded within 45 working days of the receipt of the formal written complaint by the Complaints Committee.

In case the time period exceeds, the same will be clearly explained in the final report submitted by the Complaints Committee.

Notwithstanding the company's internal procedure, every employee retains the right to file a complaint of unlawful harassment under the law of the land with relevant authorities.

In relevant cases, in accordance with the mandate of the law of the land, the company retains the right and responsibility to hand over the investigation or employee to relevant state authorities.

## Consequences

Any employee determined by HCL America Inc. to be responsible for sexual harassment will be subject to appropriate disciplinary action, up to and including termination of employment. Supervisors and managers who fail to report suspected harassment or who retaliate against individuals will also be subject to disciplinary action.

## Annexure

 **Annexure - A.docx**

### Revision History:

Version No.	From	To	Description	Author	Reviewed & Approved by
1	01 Mar 2007	31 Mar 2008	First copy	C&B Team	C&B Head
2	01 Apr 2008	30 Apr 2009	Revision	C&B Team	C&B Head
3	01 May 2009	31 Dec 2010	Revision	C&B Team	C&B Head
4	01 Jan 2011	30 Jun 2011	Revision	C&B Team	C&B Head
5	01 Jul 2011	08 Dec 2013	Revision	C&B Team	C&B Head
6	09 Dec 2013	08 Jun 2015	Revision	Policy & Compliance Team	Policy & Compliance Head
7	09 Jun 2015	28 Feb 2019	Revision	Policy & Compliance Team	Policy & Compliance Head

8	06 Sep 2017	28 Feb 2019	Revision	Policy & Compliance Team	Policy & Compliance Head
9	01 Mar 2019	14 Feb 2020	ICC members list updated and changes done in accordance to POSH Act	HR Policy & Compliance CoE	HR Policy & Compliance CoE Head
10	01 Apr 2021	25 Dec 2022	ICC members list has been updated	HR Policy & Compliance CoE	HR Policy & Compliance CoE Head
11	26 Dec 2022	12 Mar 2023	ICC member names updates region wise	HR Policy & Compliance CoE	HR Policy & Compliance CoE Head
12	13 Mar 2023	14 Jun 2023	ICC member names updated for Cochin	HR Policy & Compliance CoE	HR Policy & Compliance CoE Head
13	15 Jun 2023	02 Jul 2023	New channel of grievance reporting -Global Ethics Helpline details has been updated in the policy	HR Policy & Compliance CoE	HR Policy & Compliance CoE Head
14	03 Jul 2023	08 Jan 2024	SPOCs names and contact details has been updated	HR Policy & Compliance CoE	HR Policy & Compliance CoE Head
15	09 Jan 2024	17 Mar 2024	SPOCs names and contact details has been updated	HR Policy & Compliance CoE	HR Policy & Compliance CoE Head
16	18 Mar 2024	31 Mar 2024	SPOCs names and contact details has been <u>updated</u>	HR Policy & Compliance CoE	HR Policy & Compliance CoE Head

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7	09 Jun 2015	19 Feb 2020	Revision	HR Policy & Compliance CoE	HR Policy & Compliance CoE Head
8	06 Sep 2017	19 Feb 2020	Revision	HR Policy & Compliance CoE	HR Policy & Compliance CoE Head
9	20 Feb 2020	23 Jan 2023	Revision	HR Policy & Compliance CoE	HR Policy & Compliance CoE Head
10	04 Sep 2023	26 Sep 2024	Revision	HR Policy & Compliance CoE	HR Policy & Compliance CoE Head
11	27 Sep 2024	30 Apr 2025	Revision	HR Policy & Compliance CoE	HR Policy & Compliance CoE Head
12	01 May 2025	-	Revision	HR Policy & Compliance CoE	HR Policy & Compliance CoE Head

[PF\\_14710\\_Queensland Sexual Harassment at Workplace Policy.pdf](#)

### **1. Is an employer liable if an employee is harassed?**

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### **2. What if there was a voluntary sexual relationship?**

The end of a voluntary sexual relationship may give rise to a situation alleging sexual relationship. 1) A party may claim that the relationship was the result of quid pro quo harassment, and was not the result of voluntary conduct or mutual attraction 2) Should one party try to continue the relationship, it is possible to have the other claim that the pursuing party is engaged in hostile environment sexual harassment 3) It is also possible that there may be a spiteful action in the form of a hostile environment sexual harassment by either party as a consequence of the fallout between the parties In all these circumstances, it becomes a matter of proof, considering the facts and circumstances in determining whether there has been an incidence of sexual harassment

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Yes. You will be subject to the SECURE policy

### **5. To whom should I complain if I am in a customer site?**

You can approach the Contact Officer designated for your country or write to [secure@hcltech.com](mailto:secure@hcltech.com)

### **6. Can my employer retaliate against me for filing a complaint?**

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### **7. What are the local laws governing Sexual harassment? When I am outside my home country on a short official trip will these laws be applicable?**

Yes.

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All employees including Directors, Officers and consultants are required to comply with the rules of the Company prohibiting sexual harassment. More specifically you are required to refrain from sexually oriented behavior while interacting with other employees. It may be noted that the acts teasing, sporadic abusive utterances, occasional sexually colored jokes, could upset a person, even though it may not have been intentionally directed at him/her, and may not form a sexual harassment claim. If the censurable behavior you are engaging in, is upsetting someone, stop it immediately and refrain from future indulgences in such behavior. Additionally you are required to report all incidents of sexually oriented behavior that you are aware of, to the appropriate persons.

### **9. If an employer wants an employee to dress in what is considered a "sexy" manner, is that sexual harassment?**

It could be. Employers may not discriminate against employees on the basis of sex. Asking you to dress in a provocative manner may involve both quid pro quo harassment and be part of creating a hostile environment. No employee should be required to be put in a position that encourages people (whether other employees or visitors, vendors, customers, or salespeople) to make unwelcome sexual advances.

## FAQ

- **What should I do if I experience sexual harassment?**
  - Report the incident as soon as possible to your supervisor, Human Resources Manager, or email [Secure@hcl.com](mailto:Secure@hcl.com). If your supervisor is involved, report to your skip-level manager.
- **What if I witness harassment towards someone else?**
  - You are encouraged to report any suspected harassment to your supervisor or the Human Resources Manager.
- **Will I face retaliation for reporting harassment?**
  - No, HCL America Inc. prohibits retaliation against anyone who files a complaint, participates in an investigation, or opposes discriminatory practices.
- **Where can sexual harassment occur?**
  - Sexual harassment can occur in the workplace, during business travel, at company events, or through communications like calls, texts, emails, and social media, even if off-premises or outside work hours.
- **What legal protections do I have against sexual harassment?**
  - Federal, state, and local laws protect employees from sexual harassment. You may file complaints with agencies like the EEOC or, in New York, the DHR.
- **What actions might be considered sexual harassment?**
  - Actions like unwelcome physical contact, sexual advances, inappropriate comments or gestures, a display of sexually explicit materials, or hostile actions may constitute sexual harassment.
- **What should I do if the harassment involves physical assault or coerced acts?**
  - Contact the local police department immediately.
- **Are supervisors required to report harassment?**
  - Yes. Supervisors and managers must report any suspected harassment to [Secure@hcl.com](mailto:Secure@hcl.com) and may face disciplinary action for failing to do so.
- **How will the company handle my complaint?**
  - We will investigate promptly and confidentially to the extent possible and take appropriate action based on the findings.

## Glossary

Term	Definition
Policy	HCLTech Prevention and Redressal of Sexual Harassment at Workplace Policy - India
HCLTech or Company or Employer	HCL Technologies Ltd including its subsidiaries worldwide ("HCLTech")
Complainant	An employee lodging a complaint under this Policy
Employee	a person/persons who is/are working on a full time employment of the Company
Internal Committee	the committee constituted by the Company as per this policy and the relevant laws in India for investigation and redressal of all sexual harassment complaints and conducting preventive activities to create an environment free from sexual harassment
Reporting Manager (RM)	any other Employee of the Company or its affiliated companies, who by nature of his duties, exercises authority or supervision

	or control over an Employee during the course of normal work hours
Respondent	a person against whom the complainant has made a complain
Workplace or Work	<p>For the purposes of this policy, the expression 'workplace' or 'at work' is not confined or limited to the actual working place of the employees in the sense of the physical space in which paid work may be performed as per the prescribed duty hours. Workplace covers private sector organization, undertaking, enterprise, establishment, unit carrying on commercial, industrial, professional, vocational, educational, etc. including production, supply, distribution or service and also includes any place visited by the employee arising out of or during course of employment, including transportation provided by employer.</p> <p>'Workplace' or 'at work' would also include inter alia office parties, work-related social functions, phone calls, sending messages through cellular phones or email from home even on an off day, or other contacts outside office hours and work-related interactions. Thus, it is not the physical workplace that would govern, but the access that a perpetrator has to the recipient of sexually harassing behavior by virtue of a job situation or relation that is relevant.</p>

## Glossary

Term	Definition
<b>CEO</b>	Chief Executive Officer of HCLTech, responsible for managerial decisions.
<b>DHR</b>	Division of Human Rights, a New York State agency enforcing anti-discrimination laws
<b>EEOC</b>	Equal Employment Opportunity Commission, a federal agency enforcing anti-discrimination laws
<b>Employee</b>	A person on the payrolls of HCL America Inc., including expatriates working under secondment or deputation letters
<b>HCL America Inc.</b>	The company to which this policy applies
<b>HR</b>	Human Resources Employee Partner or Geo HR for HCL America Inc.

<b>SGC</b>	Secure Governing Council, made up of senior employees, under the leadership of the Head-Human Resources responsible for handling harassment complaints
<b>Supervisor</b>	Any employee who exercises authority, supervision, or control over another employee during normal duty hours

### Keywords

Prevention and Redressal of Sexual Harassment at Workplace Policy, Sexual Harassment, Workplace Policy, Prevention, Redressal, Workplace Environment, Internal Committee, Complaints, Inquiry Process, Policy, Corporate Governance

### Keywords

Sexual Harassment, Harassment Policy, Reporting Procedure, HCL America Inc., Anti-Discrimination, EEOC, DHR, Retaliation, Supervisor Responsibilities, USA

### Disclaimers

The company reserves the right to alter, append or withdraw this policy either in part or in full based on management's discretion along with Unions or Work Council approval/discussions (as applicable). All procedures as per the law of land to be adhered to prior to policy launch.

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### Policy Details

#### Workplace

For the purposes of this policy, the "or", "at work" is not confined or limited to the actual working place of the employees in the sense of the physical space in which paid work may be performed as per the prescribed duty hours." Workplace" or "at

work” would include inter alia office parties, work-related social functions, phone calls, sending messages through cellular phones or email from home even on an off day, or other contacts outside office hours and work-related interactions. Thus, it is not the physical workplace that would govern, but the “access” that a perpetrator has to the recipient of sexually harassing behavior by virtue of a job situation or relation that is relevant.

## Definition of Sexual Harassment

You may be experiencing sexual harassment when one of the following is true:

- o It is stated or understood that you must submit to the behaviour in order to get or keep a job
- o Employment decisions are based on whether or not you go along with the behaviour, or
- o The behavior creates a hostile or abusive work atmosphere that changes the conditions of your job Sexual harassment could be:
  - o "Quid pro quo" (this for that) harassment occurs when decisions regarding employment are promised, threatened or given, based upon whether or not one or more employees will submit to sexually oriented conduct. Quid pro quo sexual harassment is far broader. In a quid pro quo situation, the sexual behavior does not have to be physical. For example, a supervisor might give the best work assignments to employees who don't spurn his/her sexually-oriented behavior and may penalize those who spurn such advances. "Hostile environment" sexual harassment occurs where the sexually-oriented conduct of one employee creates an offensive and unpleasant working environment for any other employee. Harassment is often about one person (or a group of people) using power inappropriately over another person/group of people. But harassment can also happen between people when there is no power relationship. It may simply create a hostile environment.

## Employee Responsibility

Employees of HCLTech must conduct themselves so as to ensure a work environment that promotes, respects and upholds the dignity of every individual at the workplace and does not become the cause of unlawful harassment. This term and act of “unlawful harassment” includes but is not restricted to unwelcome behaviour whether through visual displays, verbal, non-verbal, physical or other conduct making a person submit to requests, favours, threats or demands that alter or threaten to alter the terms of employment and interfere with work conditions.

All employees must read and acquaint themselves with the company policy to deal with sexual harassment at the workplace and clear any doubts they have with their local HR representative.

As a first step, employees are encouraged to deal directly and ask the person causing harassment to stop the unwelcome behavior. If such efforts are not successful, employees must report every incident of perceived harassment that they are aware of through the official channels at the tool available namely Global Ethics Helpline ([GEH](#)) ([GlobalEthicsHelpline - index.sharepoint.com](#)). All complaints relating to sexual harassment at workplace can be filed online through this tool. Further any queries, if needed, to be discussed can be sent to [secure@hcl.com](mailto:secure@hcl.com).

**However please note that any complaints of incidents of sexual harassment at workplace will only be accepted on Global Ethics Helpline.** Complainants who are not employees of the company and not having any relationship with the organisation however is an aggrieved party and is expected to raise a complaint by visiting [www.hcltech.com](http://www.hcltech.com)- raise a grievance ([Tool for Employee Grievances & Campaign for Ethics | HCLTech](#)) .

Employees must cooperate with the company in investigations and in preventing and curtailing unlawful discrimination and harassment at the workplace.

A detailed document on Sexual Harassment at workplace is available at Policies Hub or with any HR officer.

## False Accusations

In case the Governing Council is of the opinion that the complaint was false and malicious, appropriate disciplinary action up to termination could be taken against the complainant. A detailed reasoning for having reached the above said conclusion shall be submitted. This does not, however, include complaints which are difficult to prove or have been made in good faith but do not constitute sexual harassment per say.

### Right to appeal

Employees dissatisfied with the actions taken by the management can file an appeal with the Chief People Officer (CPO-Head of HR function) within 14 working days if they feel that principles of natural justice have not been followed.

### Prevention and Redressal of Harassment at HCL Technologies

HCLTech and its group companies ("the Group") are committed to providing an environment free of unlawful harassment. This policy prohibits sexual harassment and harassment based on pregnancy, childbirth or related medical conditions, race, religious creed, color, national origin, or ancestry, physical or mental disability, medical condition, marital status, age, sexual orientation, or any other basis protected by federal, state, or local law or ordinance or regulation. All such harassment is unlawful.

This policy applies to all persons involved in the operation of the Group and prohibits unlawful harassment from/to any employee of the Companies towards from/to other employees including supervisors, vendors, and clients. It also prohibits unlawful harassment based on the perception that anyone has any of the abovementioned prohibited characteristics or is associated with a person who has or is perceived as having any of those characteristics.

### What is expected from every employee?

1. If you believe that you have been unlawfully harassed, submit a complaint to your own supervisor or any other supervisor, or the Human Resources Manager of the Company as soon as possible after the incident. You may also report your complaint to the committee responsible for addressing grievances against harassment called Secure. You can register your complaint at [Global Ethics Helpline](#).

We encourage you to report all facts of the incident/s. It is imperative that you bring the matter to the Company's attention promptly so that any concern of discrimination, retaliation or harassment can be investigated and addressed promptly and appropriately.

In cases of sexual harassment, you can lodge your complaint immediately to Global Ethics Helpline.

1. a. You have 3 (three) months to lodge a complaint from the date of occurrence of the incident of sexual harassment at workplace This period is applicable for all Geos except Australia & New Zealand.
1. b. Please note that the timeline for raising the grievances under the Australia and New Zealand - Employment Relations (Extended Time for Personal Grievance for Sexual Harassment) Amendment Bill (Bill) is 12 months from the occurrence of the last incident.
1. c. In Australia, the time period within which an investigation would ordinarily to be concluded is within 45 (forty-five) working days of the receipt of the formal written complaint by the aggrieved party/complainant.

o If you notice or happen to receive good faith information on harassment to a third party, then you need to report this to your supervisor or the Human Resource Manager.

If the Company determines that unlawful harassment has occurred, effective remedial action will be taken in accordance with the circumstances involved. Any employee determined by the Company to be responsible for unlawful harassment will be subject to appropriate disciplinary action, up to, and including termination. The Company will not retaliate against you for filing a complaint and will not tolerate or permit retaliation by management, employees or co-workers. Please ensure that you read and acquaint yourself with this policy. If you have any questions relating to what constitutes discrimination or harassment, or if you have any other questions or concerns pertaining to discrimination or harassment, please do not hesitate to contact your local Human Resources team. The company will file the case and investigate into it from the date of occurrence and in accordance with their local laws in the specific Geo.

Apart from this, the **Office of the Secure** consists of Ranganathan Venkatachalam, [ranganathan\\_v@hcl.com](mailto:ranganathan_v@hcl.com), Annie Sundararaj, [annie.s@hcl.com](mailto:annie.s@hcl.com) and Barsha Mishra [barsha.mishra@hcl.com](mailto:barsha.mishra@hcl.com).

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## Sexual Harassment at the Workplace – Important Details for Employees

In making our work atmosphere healthier and free from harassment, the Company has made the Rules Prohibiting Sexual Harassment at the Workplace. Conduct that might be harmless or even enjoyable in a social situation can be upsetting at work. Sexual behavior that is repeated, unwanted and interferes with your job has crossed the line: it is not only inappropriate, but also illegal.

For example, if a co-worker accidentally brushes against you, it would not be considered sexual harassment. However, if that person repeatedly finds opportunities to brush against you, it is no longer accidental -- it is deliberate. Behavior

like this, which may make you feel uncomfortable and adversely affect your work, is sexual harassment.

Some behavior may be so extreme – such as sexual assault – that it constitutes sexual harassment even if the behavior occurs only once.

## What is Sexual Harassment?

You are experiencing sexual harassment when one of the following is true.

- o It is stated or understood that you must submit to the behavior in order to get or keep a job
- o Employment decisions are based on whether or not you go along with the behavior, or
- o The behavior creates a hostile or abusive work atmosphere that changes the conditions of your job
- o Sexual harassment could be:
  - o "Quid pro quo" (this for that) harassment occurs when decisions regarding employment are promised, threatened or given, based upon whether or not one or more employees will submit to sexually-oriented conduct. Quid pro quo sexual harassment is far broader. In a quid pro quo situation, the sexual behavior does not have to be physical. For example, a supervisor might give the best work assignments to employees who don't spurn his/her sexually oriented behavior and may penalize those who spurn such advances.

"Hostile environment" sexual harassment occurs where the sexually oriented conduct of one employee creates an offensive and unpleasant working environment for any other employee. Harassment is often about one person (or a group of people) using power inappropriately over another person/group of people. But harassment can also happen between people when there is no power relationship. It may simply create a hostile environment.

## Types of behavior which can be considered as sexual harassment.

Depending on the circumstances, each of the following kinds of behavior may be sexual harassment:

- o Material that is sexual in nature, sexist, sexually explicit and so on 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.
- o Verbal abuse or comments that put down people because of their sex.
- o Comments about people's (women/men) bodies
- o Tales of sexual exploits
- o Graphic descriptions of pornography
- o Pressure for dates
- o Sexually explicit gestures
- o Unwelcome touching and hugging
- o Sexist and insulting graffiti
- o Sexist jokes and cartoons. There is a difference between harmless humor which may refer to gender, race and so on and using a racist, sexist or other type of stereotyping jokes to have a "dig" at someone (and therefore to harass them). If this difference is not clear or if someone is offended, the behavior should stop immediately.

- o Obscene phone calls
- o Displaying pornography in the workplace
- o Insisting that workers wear revealing clothing
- o Inappropriate gifts (for example, lingerie)
- o Discussion of one's partner's sexual inadequacies
- o Lewd and threatening letters
- o "Accidentally" brushing sexual parts of the body.
- o Pressing or rubbing up against a victim
- o Sexual sneak attacks (such as grabbing private parts on the run)
- o Indecent exposure
- o Subtle or overt pressure for sexual favors
- o Soliciting sexual services
- o Demanding sexual services
- o Sexual or physical contact, such as slapping, kissing or touching.
- o Intrusive questions about sexual activity
- o Sexual assault (a crime as well, of course, under the Indian Penal Code)
- o Repeated sexual invitations when the person invited has refused/ignored similar invitations.
- o Coerced sexual intercourse (e.g., as a condition of employment or academic status)
- o In some cases, a single act may be enough to amount to harassment.

In some cases, a single act may be enough to amount to harassment.

### **If I think I have been sexually harassed, or am part of a hostile environment, what should I do?**

The first thing you should consider is filing your complaint at Global Ethics Helpline. Your Company cannot solve the problem if it is not aware of the problem. If you do file a complaint, be sure to follow up on it, to be sure that the Company is addressing the issue in a timely manner.

Many people who are harassed initially respond by trying to ignore the problem. But often, harassment grows worse when it is ignored. Here are some primary steps to deal with sexual harassment.

- o Tell the harasser to stop. Make it clear you don't welcome this behavior. You can say this in person or in a letter sent by registered mail. Keep copies of any written correspondence.
- o Follow the grievance procedures outlined in the company's Policy against Sexual Harassment. Remember that stopping sexual harassment is the responsibility of the employer as well as the harasser.
- o Log a complaint with [Global Ethics Helpline](#), the members of Secure Governance Council or your contact officer in your locations. In case you do not have access to mails please send a Registered letter, courier, call or meet with them. Please note that anonymous complaints will not be taken up. If you choose to complain to your manager, he/she will ensure that the complaint is routed to the committee.

- o Keep notes describing each incident, including date, time, place, what the harasser said or did, how you responded, who else might have heard or seen it and what you did at that time? Keep these notes at home. Also keep any gifts, notes or cartoons you've received from the harasser.
- o Talk to others at work, even though it may be embarrassing. Be judicious about talking to your co-workers so you don't encourage gossip or possibly harmful actions by others. But you may find witnesses, allies or other victims of the harasser who will support you. It may be helpful to talk about the experience with friends and family as well.
- o Keep copies of your employment record at home. Harassers sometimes try to defend themselves by attacking their victims' job performance.

### **Will the Rules apply to me if I am an employee who is working outside my home country?**

You will be subject to the Company's Policy Against Sexual Harassment (Overseas) Rules. Therefore, you will have to follow the procedure under those Rules.

### **To whom should I complain if I am in a customer site?**

You can approach the Contact Officer designated for your country or lodge your complaint with [Global Ethics Helpline](#).

### **Is Everything Related to Sex in the Workplace "Harassment"? What About Teasing?**

This is a difficult hard and fast rule to state. In the Indian context there are no decisions which set out the differential features between sexually oriented behavior and teasing/ sporadic events of indecency, etc. As a pointer to the probable differences, the following is the status in the USA, which has a fairly active law on this issue. However, it must be noted that this is not a statement as to the position of law in India or as to the probable interpretation that Indian courts may adopt.

In the USA, Sexual harassment is morally wrong and legally actionable. Most sexual harassment claims are made under Title VII of the Federal Civil Rights Act of 1964. It provides that "it shall be an unlawful employment practice for an employer to discriminate against any individual with respect to his compensation, terms, conditions, or privileges of employment, because of such individual's race, color, religion, sex, or national origin."

In a series of major decisions in 1998, the United States Supreme Court clarified and broadened the law. In a unanimous decision in March 1998 the Court said: "When the workplace is permeated with discriminatory intimidation, ridicule, and insult that is sufficiently severe or pervasive to alter the conditions of the victim's employment and create an abusive working environment, Title VII is violated."

The US Federal Equal Employment Opportunity Commission (EEOC) has defined sexual harassment as "unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature ... when ... submission to or rejection of such conduct is used as the basis for employment decisions... or such conduct has the purpose or effect of ... creating an intimidating, hostile or offensive working environment."

As the US Supreme Court reiterated in June 1998 "Sexual harassment under Title VII presupposes intentional conduct. The prohibition of harassment on the basis of sex forbids only behavior so objectively offensive as to alter the "conditions" of the victim's employment. In order to be actionable under the statute, a sexually objectionable

environment must be both objectively and subjectively offensive, one that a reasonable person would find hostile or abusive, and one that the victim in fact did perceive to be so."

Courts in the US determine whether an environment is sufficiently hostile or abusive by "looking at all the circumstances," including the "frequency of the discriminatory conduct; its severity; whether it is physically threatening or humiliating, or a mere offensive utterance; and whether it unreasonably interferes with an employee's work performance."

The US Federal Civil Rights Act does not prohibit "genuine but innocuous differences in the ways men and women routinely interact with members of the same sex and of the opposite sex." A recurring point in the US Supreme Court's opinions is that "simple teasing," offhand comments, and isolated incidents (unless extremely serious) will not amount to discriminatory changes in the "terms and conditions of employment."

The Court's tests are designed to filter out complaints attacking "the ordinary tribulations of the workplace, such as the sporadic use of abusive language, gender-related jokes, and occasional teasing."

It may be noted that the acts of isolated teasing, sporadic abusive utterances, occasional sexually colored jokes, could often, more appropriately, be the subject of disciplinary action under the Company's rules for misconduct.

However, the absence of a clear-cut enunciation of the law on the difference between teasing/bad humor vis-à-vis sexually oriented behavior which may amount to harassment, should not be taken as a pretext to practice such teasing/bad humor. If this difference is not clear or if someone is offended, the behavior should stop immediately.

### **If an employee yields to the demands/favour of sexual nature, does that make it consensual sex instead of harassment?**

No, not necessarily. If the sexual advances were "unwelcome", but the employee complied in order to keep his or her job; it is still considered harassment. However, if an ongoing relationship develops, it often becomes more difficult - as a matter of evidentiary proof - to convince the Secure Governance Council that the original advances were "unwelcome". It is therefore very important to file sexual harassment related issues on the Global Ethics Helpline tool at the earliest possible instance.

### **What if there was a voluntary sexual relationship?**

The end of a voluntary sexual relationship may give rise to a situation alleging sexual relationship.

- o A party may claim that the relationship was the result of quid pro quo harassment and was not the result of voluntary conduct or mutual attraction.
- o Should one party try to continue the relationship, it is possible to have the other claim that the pursuing party is engaged in hostile environment sexual harassment
- o It is also possible that there may be a spiteful action in the form of a hostile environment sexual harassment by either party because of the fallout between the parties.

In all these circumstances, it becomes a matter of proof, considering the facts and circumstances in determining whether there has been an incidence of sexual harassment.

### **Can one incident constitute sexual harassment?**

In "quid pro quo" cases, a single sexual advance may constitute harassment if it is linked to the granting or denial of a tangible employment action, such as discharge, demotion or undesirable reassignment or other changes in employment or employment benefits.

In "hostile environment" cases, generally, a single incident does not create a "hostile environment."

A hostile environment claim usually requires showing of a pattern of offensive conduct; the more extreme the conduct, the less the need to show a repetitive series of incidents.

### **Is an employer liable if an employee is harassed?**

If an employer is aware of a hostile environment and has not taken any appropriate action to correct the problem, then the employer may well be held liable for the harassment.

However, whether it was supervisors, co-workers, or customers who created the hostile environment, if the employer is not made aware of the situation, the employer should not be held responsible for hostile environment harassment.

### **What are my responsibilities as an employee?**

All employees including Directors, Officers and consultants are required to comply with the rules of the Company prohibiting sexual harassment. More specifically you are required to refrain from sexually oriented behavior while interacting with other employees. It may be noted that the acts teasing, sporadic abusive utterances, occasional sexually colored jokes, could upset a person, even though it may not have been intentionally directed at him/her, and may not form a sexual harassment claim. If the censurable behavior you are engaging in, is upsetting someone, stop it immediately and refrain from future indulgences in such behavior.

Additionally, you are required to report all incidents of sexually oriented behavior that you are aware of, to the appropriate persons.

### **If an employer wants an employee to dress in what is considered a "sexy" manner, is that sexual harassment?**

It could be. Employers may not discriminate against employees on the basis of sex. Asking you to dress in a provocative manner may involve both quid pro quo harassment and be part of creating a hostile environment. No employee should be required to be put in a position that encourages people (whether other employees or visitors, vendors, customers, or salespeople) to make unwelcome sexual advances.

### **Can my employer retaliate against me for filing a complaint?**

It is unlawful for an employer to retaliate against someone who files a charge of discrimination, participates in an investigation, or opposes discriminatory practices.

### **Retaliation by the employer/ Respondent/ by any other person related to the issue/ any Witness, any other colleagues.**

HCLTech is committed to providing an environment free of any and all kinds of harassment including sexual harassment, gender-based harassment, harassment related to special conditions like pregnancy, childbirth, harassment based on any kind of medical conditions, race, ethnicity, religious creed, color, national origin or ancestry, physical or mental disability, medical condition, marital status, age, sexual orientation, etc.

This policy applies to all persons engaged directly or indirectly with HCLTech and prohibits any kind of harassment of any employee of HCLTech or any person visiting or working with HCLTech including supervisors, vendors and clients. If the Company determines that harassment has occurred, appropriate remedial action shall be taken. Any employee determined by the Company to have caused any kind of harassment shall be dealt appropriate disciplinary action, up to, and including termination. The Company shall not retaliate against anyone for filing a complaint and shall not tolerate or permit retaliation by management, employees or co-workers.

Workplace Sexual harassment should not be ignored under any circumstances because silence or the act of ignoring towards the harassing incident conduct may be interpreted as acceptance of such incident or conduct. In making our work atmosphere healthier and free from harassment. The Company has some defined set of guidelines defined for employee; employer to make a work environment free from Harassment.

**What are the local laws governing Sexual harassment? When I am outside my home country on a short official trip will these laws be applicable?**

### **Indian Law**

The Supreme Court has defined the term sexual harassment in the case of Vishaka and others v. State of Rajasthan as under: "Sexual harassment includes such unwelcome sexually determined behaviour (whether directly or by implication) as: (a) physical contact and advances; (b) a demand or request for sexual favours; (c) sexually coloured remarks; (d) showing pornography; (e) any other unwelcome physical, verbal or non-verbal conduct of sexual nature. Where any of these acts is committed in circumstances whereunder the victim of such conduct has a reasonable apprehension that in relation to the victim's employment or work whether she is drawing salary, or honorarium or voluntary, whether in government, public or private enterprise such conduct can be humiliating and may constitute a health and safety problem. It is discriminatory for instance when the woman has reasonable grounds to believe that her objection would disadvantage her in connection with her employment or work including recruiting or promotion or when it creates a hostile work environment. Adverse consequences might be visited if the victim does not consent to the conduct in question or raises any objection thereto."

**Other Geos shall abide by their local laws.**

## Policy History

Modified Date	Version No.	From	To	Reason for creation / updation	Author	Approved by
15 Nov, 2024	1	1 Apr, 2024	28 Aug, 2024	New Launch on Policy Studio	Sadhana Yadav(Ent HR-I&C-I&C-Policy-Policy)	Srinivasan Govindan(Ent HR-I&C-I&C-Policy-Policy)
15 Nov, 2024	2	29 Aug, 2024	5 Sep, 2024	Business Requirements	Sadhana Yadav(Ent HR-I&C-I&C-Policy-Policy)	Srinivasan Govindan(Ent HR-I&C-I&C-Policy-Policy)
15 Nov, 2024	3	6 Sep, 2024	24 Oct, 2024	Business Requirements	Sadhana Yadav(Ent HR-I&C-I&C-Policy-Policy)	Srinivasan Govindan(Ent HR-I&C-I&C-Policy-Policy)
28 Nov, 2024	4	25 Oct, 2024	26 Nov, 2024	Minor changes made to the content of the policy on recommendation of SECURE team and addition of Chandigarh as a new venue for the IC location.	Sadhana Yadav(Ent HR-I&C-I&C-Policy-Policy)	Srinivasan Govindan(Ent HR-I&C-I&C-Policy-Policy)
23 Jun, 2025	5	27 Nov, 2024	22 Jun, 2025	1. Location – Hardoi and Tuticorin has been added. 2. Members – (i) Priyanka Bijolia – has been added in Hardoi and Tuticorin locations and (ii) Smrita Rastogi has been removed from Bengaluru Location	Sadhana Yadav(Ent HR-I&C-I&C-Policy-Policy)	Srinivasan Govindan(Ent HR-I&C-I&C-Policy-Policy)
23 Jun, 2025	6	23 Jun, 2025		IC Committee SPOC details have been updated	Sadhana Yadav(Ent HR-I&C-I&C-Policy-Policy)	Srinivasan Govindan(Ent HR-I&C-I&C-Policy-Policy)
25 Aug, 2025	1	19 Aug, 2025		Launch in policy studio	Sadhana Yadav(Ent HR-I&C-I&C-Policy-Policy)	Srinivasan Govindan(Ent HR-I&C-I&C-Policy-Policy)
25 Aug, 2025	1	19 Aug, 2025		Launch in policy studio	Sadhana Yadav(Ent HR-I&C-I&C-Policy-Policy)	Srinivasan Govindan(Ent HR-I&C-I&C-Policy-Policy)