



Sexual Harassment Policy

Version 2.3



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Prepared By

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Reviewed and Approved By

Version	Date	Reviewed by	Approved By	Owner
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1.0	19/03/2012	HR Director	Mr. R.Kumar	HR Director
1.1	27/06/2012	HR Director	Mr. R.Kumar	HR Director
1.2	28/06/2013	HR Director	Mr. R.Kumar	HR Director
1.3	21/06/2014	HR Director	Mr. R.Kumar	HR Director
1.4	01/08/2014	HR Director	Mr. R.Kumar	HR Director
1.5	22/06/2015	HR Director	Mr. R.Kumar	CISO/CEO
1.6	14/06/2016	HR Director	Mr. R. Kumar	CISO
1.7	15/11/2017	HR Director	Mr. R. Kumar	CISO
1.8	12/06/2018	HR Director	Mr. R. Kumar	CISO
1.9	10/07/2019	HR Director	Mr. R. Kumar	CISO
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2.2	02/12/2022	HR Director	Mr. R. Kumar	CISO
2.3	05/12/2023	HR Director	Mr. R. Kumar	CISO

1. PURPOSE

AEL Data Sexual Harassment Policy of the Employees would help the Organisation to create an equal employment opportunity company and is committed to creating a healthy working environment that enables employees to work without fear of prejudice, gender bias and sexual harassment. The Company also believes that all employees of the Company have the right to be treated with dignity.

Sexual harassment at the work place or other than work place if involving employees is a grave offence and is, therefore, punishable. AEL Data into protect the human assets by reducing the exposure to various Environmental threats that can produce a disruption or denial of computer service.

2. SCOPE

This Policy extends to all employees of the Organisation and is deemed to be Incorporated in the service conditions of all employees and comes into effect immediately In the AEL Data premises.

3. ROLES AND RESPONSIBILITIES

HR Director, HR Dept and all Employees within AEL Data are responsible for adhere the Sexual Harassment policy of the Organisation.

4. REFERENCE STATEMENTS



Sexual Harassment Policy

In order to ensure that AEL Data, This Policy extends to all employees of the Organisation and is deemed to be incorporated in the service conditions of all employees and comes into effect immediately. Sexual Harassment would mean including but not limited to the following:

- unwelcome sexual advances, requests or demand for sexual favors, Either explicitly or implicitly, in return for employment, promotion, Examination or evaluation of a person towards any Organisation activity;
- unwelcome sexual advances involving verbal, non-verbal, or physical Conduct such as sexual jokes, letters, phone calls, E-mail, gestures, showing of pornography, physical contact, stalking, sounds, display of pictures and signs, verbal or Non-verbal communication which offends the individuals sensibilities
- Eve teasing, innuendos and taunts, physical confinement against one's Will and likely to intrude upon one's privacy;
- conduct of such an act at work place or outside in relation to an Employee of AEL Data, or vice versa during the course of employment; and
- "Employee" means any person on the rolls of the Organisation including Those on deputation, contract, temporary, part time or working as Consultants.
- Code of conduct document

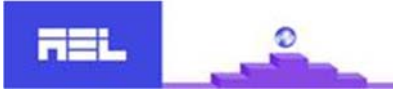
4.1. COMPLAINT REDRESSAL COMMITTEE

AEL Data Information Security Committee has been constituted by the AEL Data Management to consider and redress complaints of Sexual Harassment.

Educate our employees and contractors on their environmental responsibilities and ensure this is integrated into their work practices, training and decision making

4.2. REDRESSAL PROCESS

- Any employee who feels and is being sexually harassed directly or indirectly may submit a complaint of the alleged incident to the HR Dept of the Information Security Committee in writing with his/her signature within 3 days of occurrence of incident.
- The AEL Data HR Dept and ISC will maintain a register to endorse the complaint received by it and keep the contents confidential, if it is so desired, except to use the same for discreet investigation.
- The AEL Data HR Dept and ISC will hold a meeting with the Complainant within five days of the receipt of the complaint, but no later than a week in any case.
- At the first meeting, the AEL Data HR Dept and ISC members shall hear the Complainant and record her/his allegations. The Complainant can also submit any corroborative material with a documentary proof, oral or written material, etc., to substantiate his / her complaint. If the Complainant does not wish to depose personally due to embarrassment of narration of event, a lady officer for lady employees involved and a male officer for male employees, involved shall meet and record the statement.



- Thereafter, the person against whom complaint is made may be called for a deposition before the ISC and an opportunity will be given to him / her to give an explanation, where after, an “Enquiry” shall be conducted and concluded.
- In the event, the complaint does not fall under the purview of Sexual Harassment or the complaint does not mean an offence of Sexual Harassment, the same would be dropped after recording the reasons thereof.
- In case the complaint is found to be false, the Complainant shall, if deemed fit, be liable for appropriate disciplinary action by the AEL Data Management as per HR/admin Policy.

4.3. ENQUIRY PROCESS

- The HR Dept and ISC shall immediately proceed with the Enquiry and communicate the same to the Complainant and person against whom complaint is made.
- The HR Dept and ISC shall prepare and hand over the Statement of Allegation to the person against whom complaint is made and give him / her an opportunity to submit a written explanation if she / he so desires within 7 days of receipt of the same.
- The Complainant shall be provided with a copy of the written explanation submitted by the person against whom complaint is made. If the Complainant or the person against whom complaint is made desires any witness/es to be called, they shall communicate in writing to the HR Dept and ISC the names of witness/es whom they propose to call.
- The HR Dept and ISC shall call upon all witnesses mentioned by both the parties. The ISC and HR Dept shall provide every reasonable opportunity to the Complainant and to the person against whom complaint is made, for putting forward and defending their respective case.
- The HR Dept and ISC shall complete the “Enquiry” within reasonable period but not beyond three months and communicate its findings and its recommendations for action to the CISO-HR Director. The report of the HR Dept and ISC shall be treated as an enquiry report on the basis of which an erring employee can be awarded appropriate punishment straightaway.
- The CISO -HR Director will direct appropriate action in accordance with the recommendation proposed by the HR Dept and ISC. The HR Dept and ISC shall be governed by such rules as may be framed by the Supreme Court orders or any other legislation enacted later on.

5. COMPLAINT

- 5.1. Audits will be performed on a regular basis by authorized organizations/designated officers of AEL Data.
- 5.2. Audits will be managed in accordance with the Information Security Audit Procedure.
- 5.3. Every effort will be made to prevent audits from causing operational failures or disruptions.

6. EXCLUSIONS

There are no exclusions to the above guidelines



7. ENFORCEMENT

Any employee found to have violated this policy may be subject to disciplinary action as per HR & Admin Procedure.