




**Karvy Data Management Services Limited**

**Prevention of Sexual Harassment Policy  
(POSH)**



Prepared By	Designation	Signature
Ms. Shruti Walia	Company Secretary	

Reviewed By	Designation	Signature
Mr. V. Mahesh	CEO and Managing Director	

Approved By	Designation	Signature
On behalf of the Board	CEO and Managing Director	



## Prevention of Sexual Harassment Policy (POSH)

Karvy Group is committed to ensuring a workplace free from sexual harassment and to provide mechanism for redressal of complaints of sexual harassment without fear or threat of reprisals in any form or manner. Accordingly, the Company has framed the Policy for the Prevention of Sexual Harassment ("the Policy") which is outlined in accordance to the Sexual harassment of women at workplace ( Prevention, Prohibition and Redressal) ACT,2013.

### Scope of this policy

The Policy extends to all Companies in the Karvy Group across all employee segments.

### About the Policy:

Sexual harassment is deemed to be misconduct and includes such unwelcome sexually determined behavior (whether directly or by implication) namely:

- Physical contact and advances; or
- A demand or request for sexual favors; or
- Making sexually colored remarks; or showing pornography; or
- Physical confinement against one's will and any other act likely to violate one's privacy
- Unwelcome sexual overtone in any manner such as over telephone (obnoxious telephone calls) and the like
- Any unwelcome physical, verbal or non-verbal conduct of sexual nature
- Any other behaviour which is objectionable in any manner and an impediment to providing a workplace free from all forms of sexual harassment

KARVY has constituted a Core complaint committee called the POSH committee with regional representatives to prohibit, prevent or deter the commission of acts of sexual harassment at workplace.

### The POSH Committee

Any employee who has any grievance in above mentioned cases can write to any committee members (as mentioned below) of the same in full confidence. All allegations of sexual harassment will be quickly and discreetly investigated by the senior management team (complaint committee) as per the policy.

Name & contact details of members of the committee:

Sr.No.	Name	Contact No.	Email-id
1	<b>Ms.Sailaja Y (Presiding Officer)</b>	9948111566	<b>posh@karvy.com</b>
2	Mr.Deepak Gupta(Committee member)	8975520202	
3	Mr.CH Viswanath (Committee member)	9704779000	
4	<b>Dr.Arpita (External Committee member)</b>	8688801408	
5	Ms. Karuna Kamath (Committee member)	8008646767	
6	Ms. Aruna Kanneganti (Committee member)	9000078882	
7	Shabna Iyer (Committee member)	9866136755	
8	Gulzar Jiwani (Committee member)	8019757231	



### Employee Initiative

- Any employee who feels or believes that he or she has been subjected to or witnessed sexual harassment in the Company, has an obligation and duty to report the same to [posh@karvy.com](mailto:posh@karvy.com)
- Any employee who feels and is being sexually harassed directly or indirectly may submit their complaint to the committee with his/ her signature or personal/official mail id within 10 days of occurrence of incident.
- If complaints of sexual harassment are submitted to or received by colleagues, leaders, managers or the concerned HR SPOC, the said colleagues, leaders, managers or HR SPOC have to forward the same immediately to [posh@karvy.com](mailto:posh@karvy.com)
- Further, colleagues, leaders, managers or the concerned HR SPOC have an obligation and duty to ensure complete confidentiality of all complaints.

It is important to emphasize that employees will not be retaliated against in any way for making a good faith complaint of sexual harassment.

### Process for Complaint redressal

- An employee who is aggrieved by any conduct / behavior or is witness to or privy to information that amounts to sexual harassment is entitled/required to submit a complaint in writing to [posh@karvy.com](mailto:posh@karvy.com)
- The said complaint should contain all available details/information that the complainant has or is aware of.
- On filing a complaint, the core committee has to investigate the complaint and submit a report with its recommendations to the top management which will take suitable action within 90 days.
- Malicious complaint filed by any employee would be subject to disciplinary action by the Management.

