

SSG Software Systems Private Limited Policy against Sexual Harassment

The Policy Statement –

SSG Software Systems Private Limited is committed to providing a safe environment for all its Employees, Employees on contract, Academic Project Trainees, Visitors, Vendors, Casual workers, Contractors and Customers, at it's office - free from discrimination on any ground (except skill and performance) and from harassment at work including sexual harassment.

SSG Software Systems Private Limited will

- operate a zero tolerance policy for any form of sexual harassment in the workplace,
- treat all incidents seriously and promptly
- Investigate all allegations of sexual harassment.

Any person found to have sexually harassed another will face disciplinary action, up to and including dismissal from employment / contract / payment or legal step may be taken against the harassing party.

All complaints of sexual harassment will be taken seriously and treated with respect and in confidence.

No one will be victimized for making such a complaint.

Every Employee, Employee on contract, Academic Project Trainee, Visitor, Vendor, Casual worker, Contractor and Customer is responsible to be alert for self as well as others around to prevent such incidents.

HR processes of training the Employees, Employees on contract and Academic Project Trainees on etiquette, dress sense, Non Disclosure Agreement, Health awareness, keeping good health, discipline, office timings by HR and Managers should not be treated as Sexual harassment, where the trainer is aware about the subject sexual harassment. It is the responsibility of the complaining person to read and understand the Policy.

In Sales and Marketing and operation processes – everyone commonly uses terms which may mean a sexual term. Since for decades these terminologies are used to explain sales and marketing or operations, they should not be treated as a sexual abuse. Some of the examples are – Delivery of Goods and Services, Market Penetration – to name a few.

Definition of sexual harassment –

Sexual harassment is unwelcome conduct of a sexual nature which makes a person feel offended, humiliated and/or intimidated.

It includes situations where a person is asked to engage in sexual activity as a condition of that person's employment, as well as situations which create an environment which is hostile, intimidating or humiliating for the recipient.

Sexual harassment can involve one or more incidents and actions constituting harassment may be physical, verbal and non-verbal.

Examples of conduct or behavior which constitute sexual harassment include, but are not limited to:

Physical conduct (Unwelcome physical contact including patting, pinching, stroking, kissing, hugging, fondling, or inappropriate touching)

Physical violence, including sexual assault (Physical contact, e.g. touching, pinching)

The use of job related threats or rewards to solicit or to offer sexual favors

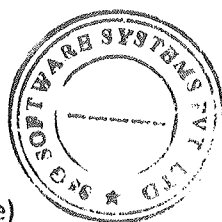
Verbal conduct (Comments on a worker's appearance, age, private life, etc.)

Sexual comments, stories and jokes

Sexual advances



Mrs. Hena S Gupta
Director (HR and Finance)



Bangalore
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Repeated and unwanted social invitations for dates or physical intimacy

Insults based on the sex of the worker

Condescending or paternalistic remarks

Sending sexually explicit messages (by phone or by email)

Non-verbal conduct

Display of sexually explicit or suggestive material

Sexually-suggestive gestures

Whistling

Leering

Anyone can be a victim of sexual harassment, regardless of their sex and of the sex of the harasser.

SSG Software Systems Private Limited recognizes that sexual harassment may also occur between people of the same sex.

What matters is that the sexual conduct, against whom the conduct is directed, is unwanted and unwelcome by the person as well as the company.

SSG Software Systems Private Limited recognizes that sexual harassment is a manifestation of power relationships and often occurs within unequal relationships in the workplace, for example between manager or supervisor and employee.

Anyone, including employees of SSG Software Systems Private Limited, clients, customers, casual workers, contractors or visitors who sexually harasses another will be reprimanded in accordance with this internal policy.

All sexual harassment is prohibited whether it takes place within SSG Software Systems Private Limited premises or outside, including at social events, business trips, training sessions or conferences sponsored by or assigned by SSG Software Systems Private Limited.

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Complaints procedures

Victims of sexual harassment may want to resolve the matter in different ways. Some may be happy with an informal resolution and for the matter to stop, others may want more formal measures.

Anyone who is subject to sexual harassment should, if possible, inform the alleged harasser that the conduct is unwanted and unwelcome. SSG Software Systems Private Limited recognizes that sexual harassment may occur in unequal relationships (i.e. between a supervisor and his/her employee) and that it may not be possible for the victim to inform the alleged harasser.

If a victim cannot directly approach an alleged harasser, he/she can approach Mrs. Hena S Gupta, Director (Finance and HR), responsible for receiving complaints of sexual harassment.

When the designated person (Mrs. H S Gupta, in this case) receives a complaint of sexual harassment, she will:

- immediately record the dates, times and facts of the incident(s)
- ascertain the views of the victim as to what outcome he/she wants



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- ensure that the victim understands the company's procedures for dealing with the complaint
- discuss and agree the next steps: either informal or formal complaint, on the understanding that choosing to resolve the matter informally does not preclude the victim from pursuing a formal complaint if he/she is not satisfied with the outcome
- keep a confidential record of all discussions
- respect the choice of the victim
- ensure that the victim knows that they can lodge the complaint outside of the company through the relevant country/legal framework

Throughout the complaints procedure, a victim is entitled to be helped by a counsellor within the company.

SSG Software Systems Private Limited will nominate a number of counsellors and provide them with special training to enable them to assist victims of sexual harassment.

SSG Software Systems Private Limited recognizes that because sexual harassment often occurs in unequal relationships within the workplace, victims often feel that they cannot come forward.

SSG Software Systems Private Limited understands the need to support victims in making complaints.

Informal complaints mechanism - If the victim wishes to deal with the matter informally, the designated person will:

- give an opportunity to the alleged harasser to respond to the complaint
- ensure that the alleged harasser understands the complaints mechanism
- facilitate discussion between both parties to achieve an informal resolution which is acceptable to the complainant, or refer the matter to a designated mediator within the company to resolve the matter
- ensure that a confidential record is kept of what happens
- follow up after the outcome of the complaints mechanism to ensure that the behavior has stopped
- ensure that the above is done speedily and within seven days of the complaint being made


Formal complaints mechanism –

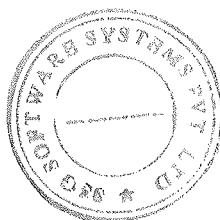
If the victim wants to make a formal complaint or if the informal complaint mechanism has not led to a satisfactory outcome for the victim, the formal complaint mechanism should be used to resolve the matter.

The designated person who initially received the complaint will instigate a formal investigation. The senior human resources manager may deal with the matter herself, refer the matter to an internal or external investigator or refer it to a committee of three others in accordance with this policy.

The person carrying out the investigation will:

- interview the victim and the alleged harasser separately
- interview other relevant third parties separately
- decide whether or not the incident(s) of sexual harassment took place
- produce a report detailing the investigations, findings and any recommendations


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- if the harassment took place, decide what the appropriate remedy for the victim is, in consultation with the victim (i.e - an apology, a change to working arrangements, a promotion if the victim was demoted as a result of the harassment, training for the harasser, discipline, suspension, dismissal)
- follow up to ensure that the recommendations are implemented, that the behavior has stopped and that the victim is satisfied with the outcome
- if it cannot determine that the harassment took place, he/she may still make recommendations to ensure proper functioning of the workplace
- keep a record of all actions taken
- ensure that the all records concerning the matter are kept confidential
- ensure that the process is completed as quickly as possible and in any event within one month of the complaint being made

It is also vital that the wishes and needs of the victim are incorporated into the outcome of the complaints mechanism. For example, if it is found that a victim was harassed by a colleague and that they work together on a daily basis, the views of the victim should be ascertained before making a decision on re-organizing the office. For example, the victim may not want to be moved to a different department and as the victim, he/she should be entitled to decide this and not be re-victimized by being forced to move within the company.

Sanctions and disciplinary measures –

Anyone who has been found to have sexually harassed, provoked or indulged (agreed to) in activities of such nature willingly with another person under the terms of this policy is liable to any of the following sanctions:

- verbal or written warning
- adverse performance evaluation
- reduction in wages
- transfer
- demotion
- suspension
- dismissal
- Stopping Payment
- Complaint to Police

The nature of the sanctions will depend on the gravity and extent and party of the harassment.

Suitable deterrent sanctions will be applied to ensure that incidents of sexual harassment are not treated as trivial.

Certain serious cases, including physical violence, will result in the immediate dismissal of the harasser.



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Implementation of this policy -

SSG Software Systems Private Limited will ensure that this policy is widely disseminated to all relevant persons through its website.

Whenever, there is a hint of such behavior by anyone, any employee can ask for group training on the content of this policy to the Director(HR) as a first level hint on something is going wrong.

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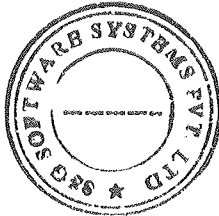
Monitoring and evaluation -

SSG Software Systems Private Limited recognizes the importance of monitoring this sexual harassment policy and will ensure that it anonymously collects statistics and data as to how it is used and whether or not it is effective.

Supervisors, managers and those responsible for dealing with sexual harassment cases will report on compliance with this policy, including the number of incidents, how they were dealt with, and any recommendations made. This will be done on a yearly basis. As a result of this report, the company will evaluate the effectiveness of this policy and make any changes needed.

Monitoring and evaluation can be done through different means, including questionnaires completed by employees, feedback from victims or those who work in the complaints procedure. This is important to review the effectiveness of the policy and the complaints procedure.

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Director (HR and Finance)

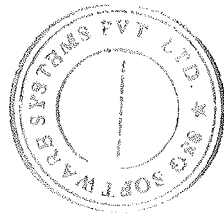
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ANTI-DISCRIMINATION Policy of SSG Software Systems (P) Ltd.

SSG Software systems (P) Ltd. its management and all its employees are bound NOT to discriminate employees by race, caste, gender, color of the skin, height, economic status, religion or work category.

After humanity, the next quality of appreciating people will be the performance, team work, speed of learning new technology and application of the same.

Apart from the above, we will also follow the anti-discrimination as stated in the constitution of India.



For SSG Software Systems (P) Ltd

Sabyasachi Gupta
Sabyasachi Gupta
Managing Director.

