

# POLICY AGAINST ALL SORTS OF HARASSMENT

## Objective:

Gozoop has worked hard to build a reputation for responsible behavior and fairness; a reputation that builds trust with our customers, employees and leaders. We can continue to build trust only if we are steadfast in our focus on improving all aspects of our responsibilities including the quality of our work environment.

## Effective:

The former policy was in force with effect from June 1st, 2014. The amended policy is effective from January 27th 2016.

## Applicability:

This policy, as amended from time to time is applicable to all the offices of Gozoop Online Private Limited and Gozoop Red Internet Services Private Limited (collectively "Gozoop").

The employees (Regular, Probationers and Interns) of Gozoop.

All people associated with Gozoop including vendors, freelancers & clients.

## The committee & the process to file a complaint:

Gozoop has formed an internal complaints committee with the following members to address complaints of harassment and to curb recurrence of such incidents within Gozoop.

Yati Doshi – 9819730668 - yati\_doshi@yahoo.com

Bansi Raja – 9920521293 – bansi@gozoop.com

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The committee members can be contacted on their respective mobile number or email id for any concerns.

An employee (or a non-employee) who either observes or believes to be the object of workplace harassment must formally file a complaint against the individual or group through an email addressed to any one or all of the committee members detailing out the incident.

The complainant may identify himself/herself or send the complaint anonymously. However, it may be noted that verification of data would become that much more difficult when anonymous complaints are received. However, where possible, the complaint should include details of the incident or incidents, supporting documents, names of individuals involved and names and addresses of any witnesses. The parties will not be allowed to bring in any legal practitioner to represent them in their case at any stage of proceeding.

The written complaint should be submitted preferably within 3 months from the date of the incident or where there is a series of incidents, within 3 months from the date of the last incident. In the instance of inability of any person to make such complaint in writing, such person may approach the Human Resources Manager who will render all reasonable assistance to such person for making such complaint in writing.

## Important Definitions:

In this Act, unless the context otherwise requires, -

(a) "sexual harassment" includes any one or more of the following unwelcome acts or behaviour (whether directly or by implication) namely:-

(i) Physical contact and advances; or

(ii) Demand or request for sexual favours; or

(iii) Making sexually coloured remarks; or

(iv) Showing pornography; or

(v) Any other unwelcome physical, verbal or non-verbal conduct of sexual nature;

(b) "workplace" includes -

(i) any department, organisation, undertaking, establishment, enterprise, institution, office, branch or unit which is established, owned, controlled or wholly or substantially financed by funds provided directly or indirectly by the appropriate Government or the local authority or a Government company or a corporation or a co-operative society;

(ii) any private sector organisation or a private venture, undertaking, enterprise, institution, establishment, society, trust, non-governmental organisation, unit or service provider carrying on commercial, professional, vocational, educational, entertainment, industrial, health services or financial activities including production, supply, sale, distribution or service;

(iii) hospitals or nursing homes;

(iv) any sports institute, stadium, sports complex or competition or games venue.

whether residential or not used for training, sports or other activities relating thereto:

(c) "Harassment" is unwelcome conduct toward an individual because of his or her age, disability, marital status, national origin, race or color, religion, sex, sexual orientation or gender identity, when the conduct creates an intimidating, hostile, offensive or inappropriate work environment that.

(i) Causes work performance to suffer; or

(ii) Negatively affects job opportunities.

(d) "Member" means a Member of the Internal Committee or the Local Committee, as the case may be;

(e) "Presiding Officer" means the Presiding Officer of the Internal Complaints Committee nominated under sub-section (2) of section 4;

(f) "Respondent" means a person against whom the aggrieved employee has made a complaint under section 9.

## Regulations

All employees have a right to work in an environment free from the demoralizing effects of harassment or unwelcome offensive or improper conduct.

Sexual harassment or harassment based on race, gender, color, religion, national origin, age, sexual orientation, gender identity or expression, disability, or veteran status or any other status protected by law will simply not be tolerated at Gozoop.

While it is not easy to provide a complete list of the types of improper behavior, prohibited conduct certainly includes: unwelcome sexual advances, requests for sexual favors, obscene gestures, displaying sexually graphic magazines, calendars, or posters, sending sexually explicit, racially offensive or derogatory e-mails, voice-mails, whatsapp or text messages, and other verbal or physical conduct of a sexual or offensive nature, such as uninvited touching of a sexual nature or sexually-related comments.

Examples of harassment that may violate the law and will violate this policy include, without limitation:

a) Verbal or written communications (in hard copy or electronic form) that contain offensive name-calling, jokes, slurs, negative stereotyping, threats, sexually enticing or pornographic material. This includes comments or jokes that are distasteful or targeted at individuals or groups based on age, disability, marital status, national origin, race or color, religion, sex, sexual orientation or gender identity.

b) Nonverbal conduct, such as staring, leering and giving inappropriate gifts.

c) Physical conduct, such as assault or unwanted touching.

d) Teasing, inappropriate innuendos and taunts, physical confinement against one's will, any form of unwarranted and unwelcome physical contact or advances and intrusion upon one's privacy;

e) Visual images, such as derogatory, offensive, sexually enticing or pornographic pictures, cartoons, drawings or gestures. Such prohibited images include those in hard copy or electronic form;

f) Making statements in a public forum or generally in an informal gathering, which are known to be offensive or threatening or disparaging to the caste/community/sexual preference/gender of a person;

g) Unauthorized deduction/withholding/delay in payment of salary and benefits of an individual;

h) Any conduct which has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile or offensive working environment or which may be inferred as objectionable by others;

i) Submission to any conduct of a sexual nature which is made either explicitly or implicitly a term or condition of an individual's employment including unwelcome sexual advances, requests for sexual favors.

There is a procedure for investigating and resolving issues of harassment at each operating company. Employees should promptly report incidents of harassment to the internal committee as mentioned above.

All reported incidents will be investigated in accordance with the applicable laws, with an effort to keep the source of the report confidential except where the company finds disclosure necessary for resolution.

Where inappropriate conduct has occurred, specific disciplinary actions, up to and including discharge without pay and/or legal action, where appropriate, will be implemented.

Any employee who, in good faith, reports a possible violation of this policy will be protected from any form of retaliation.

All investigations will be governed by the Sexual Harassment at Workplace (Prevention, Prohibition and Redressal) Act, 2013.

Towards the end, that everyone to whom this policy is applicable is requested to read the policy thoroughly. For any questions, the HR can be contacted.