# Anti-Sexual Harassment Policy

# 1. Policy Statement

Silverlink Technologies Pvt Ltd is committed to creating and maintaining a workplace free from sexual harassment. We have zero tolerance policy for any form of sexual harassment in the workplace, treat all incidents seriously and promptly investigate all allegations of sexual harassment. We believe that all employees, contractors, clients, and visitors have the right to work in an environment that promotes respect, dignity, and equality. Sexual harassment is unlawful and will not be tolerated.

### 2. Purpose

This policy outlines Silverlink's stance on sexual harassment, provides examples, and establishes procedures for reporting and addressing incidents. We aim to foster a safe, supportive, and respectful work environment.

## 3. Scope

This policy applies to all employees, contractors, clients, vendors and visitors of Silverlink Technologies at all locations where Silverlink Technologies operates. It covers conduct during work hours, at work-related events, and on digital platforms used for work purposes.

#### 4. Definition of Sexual Harassment

Sexual harassment includes any unwelcome sexual advance, request for sexual favors, or other verbal, non-verbal, or physical conduct of a sexual nature when:

- Submission to such conduct is made, either explicitly or implicitly, a term or condition of an individual's employment.
- Submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting that individual.
- Such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile, or offensive work environment.

#### **Examples of Sexual Harassment:**

- Unwanted sexual advances, flirtations, or propositions.
- Inappropriate touching, comments, jokes, or gestures of a sexual nature.
- Sending or displaying sexually suggestive messages, emails, or images.
- Commenting on an individual's appearance or personal life in a sexual manner.
- Repeated unwelcome social invitations or gifts.

### 5. Roles and Responsibilities

#### **Employees:**

- Maintain a respectful workplace and refrain from any form of sexual harassment.
- Report any incidents or concerns regarding sexual harassment to appropriate channels.

#### **Supervisors and Managers:**

- Ensure a work environment free from harassment.
- Take immediate and appropriate action if they observe or become aware of conduct that may constitute harassment.
- Maintain confidentiality regarding reported incidents, disclosing information only as necessary to conduct a thorough investigation.

#### **Human Resources:**

- Provide training on anti-harassment policies and procedures.
- Investigate complaints promptly, impartially, and confidentially.
- Take appropriate corrective and preventive action.

#### 6. Reporting Procedures

Employees are encouraged to report sexual harassment as soon as possible to ensure a prompt investigation. Reports can be made to any of the following:

- Immediate supervisor or manager
- Human Resources department

When a designated person receives a complaint of sexual harassment, he/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
- 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

**Confidentiality:** All complaints and investigations will be handled confidentially to the extent possible, with information disclosed only to those who need it to investigate and resolve the matter.

**No Retaliation:** Retaliation against anyone for reporting harassment or participating in an investigation is strictly prohibited. Retaliation may result in disciplinary action, up to and including termination.

#### 7. Investigation Process

Upon receiving a complaint, the POSH Committee in the company will:

- Acknowledge receipt of the complaint.
- Conduct a thorough, fair, and impartial investigation.
- Maintain confidentiality during the investigation process.
- Keep the complainant informed of the investigation's status and any resolutions.
- Take corrective action based on findings, if necessary.

# 8. Disciplinary Action

If the investigation confirms that sexual harassment has occurred, disciplinary action will be taken, which may include, but is not limited to:

- Verbal or written warning
- Mandatory training or counseling
- Suspension or termination of employment

# 9. Prevention and Training

To support this policy, Silverlink Technologies:

- Provides mandatory anti-sexual harassment training for all employees upon hiring and annually thereafter.
- Educates employees on their rights and responsibilities under this policy.

#### 10. Review and Amendments

This policy will be reviewed annually by the Human Resources department and revised as needed to reflect changes in the law, organizational practices, or workplace needs.

#### **Questions or Concerns:**

If you have any questions or concerns regarding this policy, please contact HR department on <a href="mailto:internal\_hr@silverlinktechnologies.com">internal\_hr@silverlinktechnologies.com</a>