



VODAFONE IDEA LTD

POLICY FOR PREVENTION OF SEXUAL HARRASMENT

Policy Number/Version	Date of Effect	Revisit Date
PNo11/v4.0	26/05/2026	26/05/2029

1. Philosophy

- 1.1** Vodafone Idea Limited (VIL) is an equal employment opportunity organization, committed to ensure a safe, secure and congenial work environment for all its employees, irrespective of gender, caste, creed or sex and enable employees to render their services without fear of any prejudice, bias and sexual harassment.
- 1.2** This policy is applicable to all Employees of VIL and its subsidiaries located at the Workplace which aims at (i) ensuring the protection of employees from sexual harassment, (ii) creating awareness of the Indian law in force and the VIL's internal policies amongst employees to prevent sexual harassment, and (iii) putting in place the recourse mechanism available to employees for re-dressal of complaints relating to sexual harassment.

2. Objective

- 2.1** VIL believes that all employees have the right to be treated with utmost respect and dignity and should have the opportunity to work in an environment free from sexual harassment. VIL will not tolerate sexual harassment in the workplace in any form or manner.
- 2.2** The purpose of this policy is to:
- 2.2.1 Ensure a safe working environment free from sexual harassment, in which persons of all gender work and complement each other as equals,
 - 2.2.2 Prevent sexual harassment of employees at the workplace,
 - 2.2.3 Give employees a mechanism to raise concerns or issues with respect to sexual harassment at the workplace; and
 - 2.2.4 Provide them with an appropriate redressal mechanism.
- 2.3** Sexual harassment of employees at workplace is a grave offence which would also be treated as 'Misconduct' under the Code of Conduct of the Company. Any conduct or behaviour that amounts to sexual harassment shall result in disciplinary action as mandated by relevant Company policies and applicable laws.
- 2.4** This Policy is framed bearing in mind the provisions and applicability of Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (hereinafter referred to as "the Act") and the Rules framed thereunder as well as the Code of Conduct and other



policies respecting diversity and equality in respect of hiring, promotions, conditions of service, etc.

3. Applicability & Scope

- 3.1** This Policy shall be applicable to all “Employees” of VIL and all its subsidiaries, hereinafter collectively as “the Company”, and to any Aggrieved Employee as defined hereinafter.
- 3.2** This policy shall come to effect in instances where the respondent is an employee of Company and the incident occurs at a Company workplace.
- 3.3** A designated HR Head of the Company for Corporate and Circle Establishments of the company is appointed as Employer as the person(s) responsible for the overall administration and implementation of this Policy,
- 3.4** The establishment where the incident occurs and/or where Respondent is posted shall primarily have the jurisdiction to address, investigate and facilitate redressal of any complaint under this Policy through the respective Circle Internal Committee. However for incidents which involves Business Leadership Team members or the employer of such Circle as respondent, the investigation shall be carried out by Corporate Internal Committee representatives with invitee members from the Circle of incident, as may be required.

4. Definitions

- 4.1** “Sexual harassment” includes any one or more of the following unwelcome acts or behavior whether directly or by implication, namely:
- 4.1.1 Physical contact and advances; or
 - 4.1.2 Demand or request for sexual favors; or
 - 4.1.3 Making sexually coloured remarks; or
 - 4.1.4 Showing pornography; or
 - 4.1.5 Any other unwelcome physical, verbal or non-verbal conduct of sexual nature
 - 4.1.6 If any of the following circumstances occur or are present in relation to or connected with any act or behaviour of sexual harassment, the same may amount to sexual harassment:
 - 4.1.6.1** Implied or explicit promise of preferential treatment in employment of employee; or
 - 4.1.6.2** Implied or explicit threat of detrimental treatment in his/her employment; or
 - 4.1.6.3** Implied or explicit threat about his/her present or future employment status; or
 - 4.1.6.4** Interferes with his/her work or creating an intimidating or offensive or hostile work environment for him/her; or
 - 4.1.6.5** Humiliating treatment likely to affect his/her health or safety
- 4.2** “Aggrieved Employee” means a Employee, of any age whether employed or not, who alleges to have been subjected to any act of sexual harassment by the respondent
- 4.3** “Complainant” means an Aggrieved employee who alleges to have been subjected to any act of Sexual harassment by the Respondent



- 4.4** “Employee” means a person employed at a workplace for any work on regular, temporary, ad hoc or daily wage basis either directly or through an agent, including a contractor, with or without the knowledge of the Company, whether for remuneration or not, or working on a voluntary basis or otherwise, whether the terms of employment are express or implied and includes a co-worker, a contract worker, probationer, trainee, apprentice or called by any other such name
- 4.5** “Employer” with respect to Company Establishments including that at corporate offices including its registered office and Circles Establishment as listed in Schedule 1 shall have the same meaning as defined under the Act and for the purposes of this policy and the rules made thereunder, shall mean the designated Head of HR at respective registered office of the Company.
- 4.6** “Workplace”- Each of the following shall individually be the “workplace” for the purpose of this Policy:
- 4.6.1 Registered office of the Company at Suman Tower, Plot No. 18, Sector – 11, Gandhinagar – 382011, Gujarat and other Corporate/ Central offices (hereinafter “Corporate Establishment”) and other Circle Office(s) including Zonal offices/stores/branch offices/MSCs/any other business location as may be set up by the respective Circles (hereinafter “Circle Establishments”) located in different parts of the country for the purposes of running the activities of corporate, central and Circle functions. (hereinafter “Establishment”)
- 4.6.2 “Workplace” shall also include any place visited by the employee arising out of or during the course of employment, including transportation provided by the Company for undertaking such journey, or on offsite or during business functions, events, activities of the Company or the Company guest houses or accommodation and shall also include any hotel or restaurant if used for any purpose connected with or relating to business of the Company.
- 4.6.3 For the purpose of this policy, “Workplace” shall also include remote, virtual, hybrid and work from home arrangements, including any location from which an employee performs official duties or participates in work related interactions. This shall include all work related communication and engagement conducted through digital or virtual platforms such as email, telephone, messaging applications, collaboration tools, video conferencing platforms and any other electronic mode used for official business.
- 4.6.4 The Company may, at its discretion, and if the facts and circumstances so warrant, also take cognizance of incidents occurring at places other than workplace as defined above, e.g. functions and events of personal nature organized by one employee and attended by other or jointly organized by them, etc



- 4.7** “Respondent” means a person against whom the aggrieved employee has made a complaint of sexual harassment in pursuance of Section 9 of the Act;
- 4.8** “Appellate Authority” shall mean and include a 3 member committee of the leadership of the company as may be formed and notified from time
- 4.9** “Special educator” means a person trained in communication with people with special needs in a way that addresses their individual differences and needs

5. Internal Committee

- 5.1** The Company shall constitute an Internal Committee (“IC”) with pool of committee members notified on periodic basis, for all workplaces under Corporate and Circle Establishments as the case may be.
- 5.2** Internal Committee for Circle Establishment: This is a Committee of at least 5 members which is constituted in every Circle to receive and investigate into any complaints related to sexual harassment and submit its’ recommendations to the Management Team.
- 5.3** Internal Committee for Corporate Establishment: This is a committee of at least 5 members which is constituted at the Company level to receive and investigate into any complaints related to sexual harassment from any of the Circles and offices and submit its recommendations to the Management Team. The Company level internal committee will also deal with cases if the complaint is against a Circle Management team member.
- 5.4 Appellate Authority**
The appellate authority comprises of 3 members of the leadership team and will investigate any complaints made against the employer or an executive committee member.
- 5.5** The Internal Committee will be headed by a woman and at least half of its members shall consist of women. Further, to prevent the possibility of any undue pressure or influence from any quarter, the Internal Committee involves a third party i.e an external member who is well respected in the community and is knowledgeable on the subject of sexual harassment.
- 5.6** The order constituting IC for the Company Establishments and penal consequences of sexual harassment are put up on the notice board of Corporate Office and each Circle office respectively and is also available on the intranet of the Company along with other HR Policies and Guidelines.
- 5.7** The chairperson or any member of the IC cannot hold office for a period exceeding 3 (three) years from the date of their nomination. Changes in the constitution of the IC whenever necessary shall be made as expeditiously as possible.



- 5.8** In case a member of the IC dies or ceases to be engaged, as the case may be, with the Company during the period of nomination, then the Company will appoint an alternate member to the IC instead.
- 5.9** Any member of the IC shall be removed from the IC if:
- 5.9.1 He/she makes known to the public, press or media by means of publishing, communicating or in any other manner, any information in relation to the contents of a complaint, the identity and addresses of the Complainant, Respondent and witnesses, details of the conciliation and inquiry proceedings, recommendations of the IC, or the action taken against the Respondent. Such non-disclosure obligation shall not apply to information regarding the justice secured to any Complainant. However, care should be taken that the name, address, identity or any other particulars that could lead to the identification of the Complainant or witnesses should not be disclosed; or
 - 5.9.2 He/she has been convicted for an offence or an inquiry into an offence under any law for the time being in force or is pending against him/her; or
 - 5.9.3 He/she has been found guilty in any disciplinary proceedings or a disciplinary proceeding is pending against him/her; or
 - 5.9.4 He/she has so abused his/her position as to render his/her continuance in office prejudicial to the public interest.

6. Registration of Complaint

- 6.1** Any Aggrieved Employee may file a written complaint of sexual harassment at the workplace at p.sh@vodafoneidea.com, as may be notified from time to time. It shall equally be possible that complaints from Circles can also be lodged with the designate Circle Member representing in pool of committee members. It shall be the responsibility of all managers to notify the secretary of the IC of an incident of sexual harassment that he/she is either witness or is brought to his/her notice by the aggrieved Employee.
- 6.2** All complaints relating to sexual harassment at workplace shall be made as provided in the rules framed under this Policy, within a period of 3 (three) months from the date of incident. In case of a series of incidents, the complaint shall be made within a period of 3 (three) months from the date of last incident.
- 6.3** The IC in its own discretion and for reasons to be recorded in writing, may extend the time limit not exceeding 3 (three) months, if it is satisfied that the circumstances were such which prevented the Employee/ Aggrieved Employee from filing a complaint within the said period of 3 (three) months.
- 6.4** In addition to the above process, an employee/ aggrieved woman who wants to make a complaint but unable to do so for any reason whatsoever, processes as specified under the Act may be adopted to register the complaint and proceed further, as applicable. Without



prejudice to the generality of the foregoing, an employee/aggrieved women, as defined under the Act, may also file a complaint through the online 'SHe-Box' portal (@ <https://shebox.wcd.gov.in>) made available by the Ministry of Women and Child Development, Government of India, for complaints of sexual harassment at the workplace."

7. Conciliation

- 7.1 The IC may, before initiating an inquiry, at the request of the Aggrieved Employee take steps to settle the matter between him/her and the respondent through conciliation. However, no monetary settlement shall be made as a basis of conciliation.
- 7.2 If the parties arrive at a settlement, the IC shall record such settlement and forward the same to employer to take actions specified in the recommendation.
- 7.3 The IC shall provide copies of settlement as recorded to the Aggrieved Employee and the Respondent.
- 7.4 Where a settlement is arrived at, no further inquiry shall be conducted by the IC.
- 7.5 If the Aggrieved Employee informs the IC that the Respondent has not complied with any term or condition of the settlement, or if no settlement is reached at after the conciliation process, an inquiry into the complaint shall be made by the IC.

8. Inquiry Process

- 8.1 Upon receipt of the complaint as per mode stated above, the relevant members of the IC to form the quorum for investigating the complaint as per clause 6 above, which shall be communicated to the complainant.
- 8.2 The Complainant shall submit to the IC the complaint along with the supporting documents and the names and addresses of the witnesses. The complaint shall contain all the relevant material and relevant details concerning the alleged sexual harassment including the name(s) of the Respondent.
- 8.3 Within a period of 7 (seven) working days from the receipt of the complaint, the IC shall send one copy of the complaint to the Respondent. The Respondent shall file his/her reply to the complaint along with his/her list of documents, names and addresses of witnesses within a period of 10 (ten) working days from the date of receipt of complaint.
- 8.4 The IC will take immediate necessary action to cause an inquiry to be made into the complaint in accordance with the principles of natural justice. Both the Complainant and the Respondent will be given an equal opportunity to be heard. No Advocate/ legal practitioner shall be permitted to represent complainant or the Respondent. A copy of the findings of the IC shall



be made available to both the parties enabling them to make representation against the findings before the IC.

8.5 The IC shall in relation to the complaints filed by an Aggrieved Employee have the powers of a civil court as provided under the Code of Civil Procedure, 1908 (5 of 1908) in respect of the following matters:-

8.5.1 Summoning and enforcing the attendance of any person and examining him on oath

8.5.2 Requiring the discovery and production of documents

8.5.3 Any other matter

8.6 The IC shall have the right to terminate the inquiry proceedings or to give an ex-parte decision on the complaint, after giving advance notice of 15 (fifteen) days in writing, if the Complainant or Respondent fails without sufficient cause to present themselves for 3 (three) consecutive hearings convened by the Presiding Officer. The IC will make every effort to complete the inquiry within a period of 90 (ninety) days of receipt of complaint by the IC.

8.7 The IC during the pendency of the inquiry, on the written request of the Complainant, recommend to the employer (i) to transfer the Complainant or the Respondent to any other workplace; or (ii) grant leave to the Complainant up to a period of 3 (three) months; or (iii) restrain the Respondent from reporting on the work performance of the Complainant or writing his/ her confidential report and assign the same to another officer.

8.8 The leave from work granted under clause 8.7 would be in addition to the leave sanctioned under the leave policy of the Company.

8.9 The employer will implement the recommendations of the IC received under clause 8.6 and send the report of such implementation to the IC

9. Investigation Report

9.1 On the completion of an inquiry under this Policy, the IC shall provide a report of its findings to the employer, within a period of 10 (ten) days from the date of completion of the inquiry and such report shall be made available to the Complainant and Respondent.

9.2 Where the IC arrives at the conclusion that the allegation against the Respondent has not been proved, it shall recommend to the employer that no action is required to be taken in the matter.

9.3 Where the IC arrives at the conclusion that the allegation against the Respondent has been proved, it shall recommend to the employer such measures as set out in this Policy.

9.4 The employer shall implement the recommendation of the IC within 60 (sixty) days of its receipt by him/her.



10. Disciplinary Action

10.1 In unlikely event of any exception to this policy, it shall require an approval of the CHRO with a recommendation by Rewards COE. For the purposes of this Policy, disciplinary action for sexual harassment may result in any one or more of the following;

- 10.1.1 Written apology
- 10.1.2 Warning
- 10.1.3 Reprimand or censure
- 10.1.4 Withholding of promotion
- 10.1.5 Withholding of pay rise or increments
- 10.1.6 Termination from service
- 10.1.7 Undergoing counselling session
- 10.1.8 Carrying out community service

10.2 In addition to the disciplinary action taken in terms of 10.1, an appropriate amount as may be determined by the IC shall be deducted from the salary or wages of the Respondent and paid to the Aggrieved Employee or to Aggrieved Employee's legal heirs as compensation.

10.3 If due to absence of the Respondent from his duty or cessation of his employment, the employer is unable to deduct the amount referred to in clause 10.2, the employer can direct the Respondent to pay such amount to the Aggrieved Employee directly.

10.4 If the Respondent fails to pay the amount referred to in clause 10.2 to the Aggrieved Employee or the Aggrieved Employee's legal heirs, the IC may forward the order for recovery of the sum as an arrear of land revenue to the District Officer in accordance with the Act.

10.5 In determining the compensation required to be paid by the Respondent to the Aggrieved Employee as per clause 10.2, the IC shall have regard to:

- 10.5.1 The mental trauma, pain, suffering and emotional distress caused to the complainant;
- 10.5.2 The loss in the career opportunity due to the incident of sexual harassment;
- 10.5.3 Medical expenses incurred by the victim for physical or psychiatric treatment;
- 10.5.4 The income and financial status of the Respondent; and
- 10.5.5 Feasibility of such payment in lump sum or in instalments

11. False or Malicious Complaint

11.1 Where the IC arrives at a conclusion that the allegation against the Respondent is malicious or the Complainant has made the complaint knowing it to be false or the Complainant has produced any forged or misleading document, it may recommend to the employer of the Complainant or the District Officer, as the case may be, to take action against the Complainant in accordance with the provisions of the service rules applicable to the Complainant.

11.2 A mere inability to substantiate a complaint or provide adequate proof will not attract action against the Complainant.



- 11.3** Before any action is recommended by the IC, the malicious intent on part of the Complainant shall be established after an inquiry in accordance with the procedure prescribed in the rules framed by the Company under this Policy.
- 11.4** Where the IC arrives at a conclusion that during the inquiry any witness has given false evidence or produced any forged or misleading documents, it may recommend to the employer of the witness or the District Officer, as the case may be, to take action in accordance with the provisions of the service rules applicable to the witness.
- 11.5** In cases of proven false or malicious complaints, the Company shall take appropriate steps to restore the reputation of the accused person.

12. Confidentiality

- 12.1** All proceedings, documents and records maintained under this Policy shall be confidential.
- 12.2** Special privacy safeguards will be applied to the investigation and complaints will be handled on a confidential "need to know" basis. A pseudonym may be used in place of the Complainant's name.
- 12.3** All persons involved in the proceeding under this Policy including the parties, witnesses, facilitators, IC members shall be under a duty to respect and maintain confidentiality.
- 12.4** The contents of the complaint made, the identity and addresses of the Aggrieved Employee, Respondent and witnesses, any information relating to conciliation and inquiry proceedings, recommendations of the IC and the action taken by the employer or the District Officer under the provisions of this Policy shall not be published, communicated or made known to the public, press and media in any manner.
- 12.5** However, information may be disseminated regarding the justice secured to any victim of sexual harassment under this Policy without disclosing the name, address, identity or any other particulars calculated to lead to the identification of the Aggrieved Employee and witnesses.
- 12.6** Any person who is entrusted with the duty to handle or deal with the complaint, inquiry or recommendations or action under this Policy and contravenes the provisions of confidentiality will be liable for penalty as per the service rules of the Company or shall pay a fine of INR 5,000 (Rupees Five Thousand only) to the employer.



13. Victimization/ Retaliation

- 13.1** The employer will ensure that any Employee subjected to sexual harassment or any Employee giving evidence in connection with an instance of sexual harassment is not victimized or discriminated against while dealing with complaints of sexual harassment and/or in his/her career in the Company.
- 13.2** No Employee will be subjected to retaliatory action relating to his or her report of any alleged sexual harassment.
- 13.3** The employer shall forbid and take necessary steps to prevent any form of retaliation against witnesses. Even where the witness is found to be false and malicious, action shall be taken against him/her as defined in this policy.
- 13.4** If the Employee subjected to sexual harassment or any Employee giving evidence in connection with an instance of sexual harassment is victimized or discriminated against, he/she can file a complaint with the Appellate Authority as provided under this policy.

14. Appeal

- 14.1** If the victim of sexual harassment feels unsatisfied with the outcome of his/her complaint to the Circle level Complaints Committee, he/she may appeal to the Appellate Authority. This committee after hearing the appeal shall review the case its decision be final and binding on all parties concerned.
- 14.2** Any person, if aggrieved by the findings and recommendation of the IC/findings of the Appellate Authority or non-implementation of their respective recommendations, may file an appeal to a court or tribunal in accordance with the Act, within a period of 90 (ninety) days of the recommendations.

15. Annual Report

- 15.1** IC shall prepare an annual report at the end of the year and submit such report to the employer, who shall cause such report to be submitted with the concerned District Officer where the registered office of the Company is situated.
- 15.2** The annual report shall contain the following details:
- 15.2.1 number of complaints of sexual harassment received in the year;
 - 15.2.2 number of complaints disposed off during the year;
 - 15.2.3 number of cases pending for more than 90 (ninety) days;
 - 15.2.4 number of workshops or awareness programmes against sexual harassment carried out; and
 - 15.2.5 nature of action taken by the employer or District Officer



16. Awareness

- 16.1** The Company conducts training sessions, workshops, awareness programmes for sensitizing the Employees with the provisions of the Act and on sexual harassment. It is mandated that Employees should attend these awareness programmes / training sessions.
- 16.2** Any clarification/s or explanation in respect of this policy will be provided by the respective HR-Heads of the Corporate Establishment and the Circle Establishments.
- 16.3** The Company will provide necessary facilities to the IC established by the Company/ or Local Complaints Committee for dealing with the complaints and conducting an inquiry.
- 16.4** The Company will provide assistance in securing the attendance of Respondent and witness before the IC of the Company/ Local Complaints Committee.
- 16.5** The Company will make available all the necessary information required by the IC of the Company and Local Complaints Committee, as the case may be.
- 16.6** The Company shall provide assistance to the Aggrieved Employee if the Aggrieved Employee chooses to file a complaint in relation to the offence under the Indian Penal Code, 1860, or any other law for the time being in force;
- 16.7** A copy of this Policy on Prevention of Sexual Harassment at the Workplace and the rules framed under this Policy is put up on the notice board of the Corporate Establishment/ Circle Office and is also available on the intranet of the Company along with other HR Policies and Guidelines. For any clarification on this Policy, an Employee can approach the HR department.

Note: Employees are advised to approach the Legal Department of the Company in case they need any clarification on specific provisions of The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and Rules made thereunder.

Recommended By:

**EVP – EVP-HRBP
Supt,PWM,D&I,Culture,Com & Eng**

Approved By:

CHRO