



# Allstate India Private Limited (Allstate India)

(Formerly known as Allstate Solutions Pvt. Ltd.)

## **Policy on Prevention of Sexual Harassment at Workplace**

**Document type: Procedure & Guidelines**

**Functional Area: Human Resources**

<b>POLICY NAME</b>	<b>ALLSTATE INDIA POLICY ON PREVENTION OF SEXUAL HARASSMENT AT WORKPLACE</b>				
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## Contents

1. Purpose and Objective .....	4
2. Scope .....	4
3. Out of Scope .....	4
4. Prevention of Sexual Harassment at Workplace .....	4
5. Definitions .....	5
6. Internal Complaints Committee (ICC) .....	5
7. Implementation of the Recommendation of ICC: .....	7
8. Appeal: .....	7
9. Confidentiality and Non-Disclosure: .....	7
10. Obligations of the Management: .....	7
11. Penalty: .....	8
12. Amendments .....	8
13. Appendix .....	8
14. Point of Contact .....	8
15. Exception Approval .....	8
16. Glossary .....	9

VERSION HISTORY						
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1.12	1-Feb-2022	1-Feb-2022	Bitani Samanta	Chetan Garga	Nilangshu Ghosal	Updated Constitution members for Pune & Bangalore
1.13	1-Aug-2022	1-Aug-2022	Bitani Samanta	Chetan Garga	Nilangshu Ghosal	Updated Constitution members for Pune
1.14	20-Jun-23	20-Jun-23	Bitani Samanta & Prasun Chatterjee	Monarch Limaye	Ashish Soni	Annual Policy Review FY 2023. Updated scope, definitions, ICC members and added disciplinary authority
1.15	26-Mar-2026	26-Mar-2026	Rohan Pawar	Ankita Agrawal	Umesh Vakde	Updated Disciplinary Authority & Appellate Authority and IC members for Blr & Pune

## 1. Purpose and Objective

The purpose of this document is to lay down the policy for prevention of sexual harassment in Allstate India offices in accordance with the Sexual Harassment of Women at Workplace (Prevention, Prohibition & Redressal) Act 2013 ('SHWW Act') and Allstate Global Code of Business Conduct. To ensure complete compliance with the provisions of the SHWW Act, the rules there under and uphold the company's commitment to provide equal opportunity and a harassment free workplace notwithstanding race, caste, religion, color, ancestry, marital status, gender, sexual orientation, age, nationality, ethnic origin or disability, as the case may be.

Sexual Harassment by an employee to another employee will not be permitted, tolerated, or condoned. The objective of this policy is to provide protection against sexual harassment of women at workplace and the prevention and redressal of complaints of sexual harassment and matters related to it. This policy extends to all employees

## 2. Scope

The scope of this policy extends to all – Allstate India locations covering all the employees including individuals coming to the workplace for employment or for any other purpose whatsoever including but not limited to visitors, vendors, contractual resources, secondees and applies to any alleged act of sexual harassment against persons at workplace, whether the incident has occurred during or beyond office hours irrespective of their gender.

The scope of -the policy is not limited to all types of sexual harassment incidents that take place at the workplace, but also covers any conduct involving employees in the extended workplace including while travelling in the Company provided transport, business trips, off sites, external training programs, team outing or team bonding events, social gathering of employees or events (including but not limited to Recruitment Drives, CSR, Sports, Cultural Events) organized by the Company.

The policy would also cover situations of occurrence of sexual harassment during the employee working from home in a situation where the employee's supervisor or any other employee of the organization visits the residence of an employee to monitor, supervise or verify the work done by the employee including virtual harassment over calls or messages

## 3. Out of Scope

All complaints not relating to sexual harassment will not be taken up by the Internal Complaints Committee.

## 4. Prevention of Sexual Harassment at Workplace

**Meaning of Sexual Harassment:** Sexual harassment may be one or a series of incidents involving unsolicited and unwelcome sexual advances, requests for sexual favors, or any other verbal or physical conduct of sexual nature.

**Sexual Harassment** includes any one or more of the following unwelcome acts or 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 comments; or
- Showing pornography; or
- Any other unwelcome physical, verbal or non-verbal conduct of sexual nature

The following circumstances, among other circumstances, if it occurs or is present in relation to or connected with any act or behavior amounts to sexual harassment: -

- Implied or explicit promise of preferential treatment in employment; or
- Implied or explicit threat of detrimental treatment in employment; or
- Implied or explicit threat about present or future employment status; or
- Interference with the work or creating an intimidating or offensive or hostile work environment for the employee; or
- Humiliating treatment likely to affect employee's health, safety, and wellbeing

In addition to inappropriate visual, verbal and/or physical sexual harassment, sexual harassment may involve unwanted virtual interactions which will be termed as unwelcome virtual sexual harassment.

Virtual sexual harassment shall mean and include unwelcome behaviors such as:

- Inappropriately dressed (unprofessionally/ non-presentable) while on video calls.
- Personal/inappropriate comments about a person on a video call, audio call, messages or on social media handles.
- Inappropriate emoticons, memes, images or videos and messages, virtual stalking, etc.
- Threatening about performance ratings virtually.
- Requesting for unwarranted video calls and calls during odd hours.
- Inappropriate or sexist or misogynist jokes, sexualized bullying etc.
- Definitions: Words and expressions used in this policy but not defined herein shall have the meanings assigned to them under the Sexual Harassment of Women at Workplace (Prevention, Prohibition & Redressal) Act 2013. Refer to Section 15.0: Glossary for details of such definitions and terms

## 5. Internal Complaints Committee (ICC)

ICC means a committee constituted under this Policy and shall also be treated as a committee as envisaged under Section 4 of the SHWW Act and Rules thereunder. Allstate India has set up an ICC to attend the sexual harassment complaints. Details of the members, including their names and contact information, of the IC constituted by the Company for its offices at Pune and Bangalore are displayed at office notice board and have also been published in the "HR employee lounge" on SharePoint and will be updated on a periodic basis, as and when applicable. Employer will not form a part of the IC.

### 5.1 Constitution of Internal Committee:

The management shall constitute ICC consisting of the following:

- A Presiding Officer who shall be a woman employed at a senior level at workplace from among the employees
- Not less than two members from amongst employees preferably committed to cause of the women or who had experience in social work or have a legal knowledge
- One member from amongst non-governmental organization or association committed to the cause of women or a person familiar with the issues relating to harassment at workplace including sexual harassment
- The management shall ensure that at least one half of the total members so nominated shall be women
- The Presiding Officer and every member shall hold the office for a period of 3 years from the date of their appointment

### **5.2. Powers and Functions of Internal Complaints Committee:**

The ICC shall have the same powers as are vested in a Civil Court under the Code of Civil Procedure, 1908 (5 of 1908) when trying a suit in respect of the following matters, namely: —

- Summoning and enforcing the attendance of any person and examining him or her on oath;
- Requiring the discovery and production of documents; and
- Any other matter which may be prescribed.
- The ICC shall meet periodically and review the measures taken for creating awareness among the employees on gender sensitivity and suggest further measures for enhancing the level of sensitivity on the subject among the employees.

### **5.3 Complaint Procedure:**

An aggrieved employee may make a complaint, in writing, of harassment at workplace to the ICC or any of its member or mail @ POSHBangalore ([POSHBangaloreMailbox@allstate.com](mailto:POSHBangaloreMailbox@allstate.com)) or POSHPune ([POSHPune@allstate.com](mailto:POSHPune@allstate.com)) giving the details of the harassment meted out to him or her within a period of 90 days from the date of the incident and in case of a series of incidents, within a period of 90 days from the date of last incident. The complaint by an aggrieved employee be sent either by post/email or given in person to the Presiding Officer of the Committee or to any other Member of the Committee. The details of ICC committee members are mentioned in the **Annexure**

The ICC may, for the reasons to be recorded in writing, extend the time limit not exceeding 90 days, if it is satisfied that the circumstances were such which prevented the employee from filing a complaint within the said period.

Where the employee is unable to make a complaint on account of his or her physical or mental incapacity or death or otherwise, his or her legal heir may make a complaint under this section in writing. It is, however, pertinent to state that where the aggrieved employee is unable to make a complaint on account of his or her physical incapacity, a complaint may be filed by —

- his or her relative or friend; or
- his or her co-worker; or
- Any person who has knowledge of the incident, with the written consent of the aggrieved employee.

### **5.4 Procedure to be followed, post the receipt of a Complaint:**

Before the ICC initiates an inquiry, the complainant may request the ICC to take steps to resolve the matter through conciliation provided no monetary settlement shall be made as basis of conciliation. If a settlement has been so arrived, the ICC shall record the same and forward the same to the Employer and provide copies of the settlement to the aggrieved individual and the respondent. In such cases, no further inquiry shall be conducted by the ICC.

ICC shall investigate and enquire into the complaint in accordance with principles of natural justice and statutes of SHWW act.

- The enquiry shall be completed within a period of 90 days of receipt of the complaint. The parties shall not be allowed to bring any legal practitioner to represent them at any stage of the inquiry proceedings before the ICC.
- The aggrieved employee may be transferred to any place or Department, transfer to any other place, grant leave to the aggrieved employee or grant such other relief as prescribed, if the employee so requests depending on the nature of the case. The Committee may also recommend for transfer of either aggrieved employee or Respondent depending upon the facts of each case and at the request of the aggrieved employee.

**1. Implementation of the Recommendation of ICC:**

After completion of the inquiry, the ICC shall forward its finding report to the Disciplinary Authority. The Disciplinary Authority shall examine the report and thereafter decide the punishment in accordance with the disciplinary action policy of the Company which includes but not limited to written apology, warning, reprimand, withholding of promotion, withholding of pay rise or increments, terminating the services or undergoing counseling session or carrying out community service. The disciplinary action shall be completed within 60 days of the receipt of the recommendations of the ICC.

**2. Appeal:**

The Complainant or the Respondent if they are aggrieved by the Findings/recommendations of the ICC or the Orders of the Disciplinary Authority may prefer an Appeal before Appellate authority who is specified as the Appellate Authority within 90 days of the submission of the Findings by the ICC. The Appeal shall be made by the aggrieved person in writing within. The Appellate Authority shall dispose of the Appeal within 60 days.

The Appellate Authority shall hear the parties concerned. On total consideration of the case, the Appellate Authority may either confirm, modify, or set aside the findings/recommendations of the ICC or orders of disciplinary authority, as the case may be.

The Appellate Authority shall give reasons for passing his orders. The orders of the Appellate Authority shall be communicated to the Appellant as well as the Respondent

**3. Confidentiality and Non-Disclosure:**

The identity and address of the aggrieved employee, respondent and witnesses, any information relating to conciliation and enquiry proceedings, recommendations of the Committee, the action taken by the employer shall be treated as confidential and shall not be disclosed to anyone who is not authorized to receive the said information.

**4. Obligations of the Management:**

- The management is obliged to initiate action under the Indian Penal Code against a perpetrator, where the perpetrator is not an employee of the establishment and there is a complaint of Sexual Harassment against the said perpetrator in the workplace where the harassment took place
- The management is obliged to create awareness amongst employee on gender sensitivity and harassment free workplace

**5. Penalty:**

- Punishment for false or malicious complaint and false evidence. Where the ICC arrives at a conclusion that the allegation against the Respondent is malicious, false or any forged or misleading document had been produced, it may recommend to the employer, to act against the Complainant in accordance with the disciplinary policy of the company
- Punishment for false evidence or producing forged or misleading documents. Where the ICC arrives at a conclusion that during the inquiry any witness (including the Complainant and the Respondent) has given false evidence or produced any forged or misleading document, it may recommend to the employer of the witness to act against such person.
- Penalty for publication or making known contents of complaint and inquiry proceedings. Where any person, entrusted with the duty to handle or deal with the complaint, enquiry or any recommendations or action, publishes or makes known the contents of complaint or enquiry proceedings, he/she shall be liable for penalty in accordance with any breach of confidentiality the person concerned shall be liable for penalty in accordance with the provisions of service rules applicable to the said person or with penalty of Rs. 5000/- which may be recovered from the salary.
- If the Respondent or the aggrieved person retaliate, it would be treated as misconduct and the same shall have to be dealt with in accordance with disciplinary action policy of the Company.

**6. Amendments**

The Company may make any alteration or amendment or rescind any clauses of this Policy as and when it finds necessary to ensure complete compliance to the provisions of the applicable law and to ensure that the policy completely serves the purpose for which it has been laid down.

**7. Appendix**

**Disciplinary Authority and Appellate Authority for Allstate India – Bangalore and Pune**

Sl. No	Name	Authority as per this policy	Designation in Allstate India	Email id & Phone
1	Mr. Shibu Mathew Zacharia	Appellate Authority	Managing Director	91 9607971558 szaci@allstate.com
2	Mrs. Ankita Agrawal	Disciplinary Authority	Chief Human Resource Officer	9742408134 aagr@allstate.com

**8. Point of Contact**

In case of clarification please reach out to ICC members. [Please click here to access the list of ICC committee members](#)

Any questions or interpretation regarding this Policy should be directed to the ICC

**9. Exception Approval**

In case of any exception same needs to be approved by Chief Human Resource Officer and/ or Managing Director.

## Glossary

**Workplace:** includes all the offices of the company and departments, branches situated anywhere in India. It also includes any place visited by the employees arising out of or during the course of employment including transportation provided by the Management of the establishment for undertaking the journey, the places where the employees of the company have met for social, sports or extracurricular activities organized by the Company.

**Disciplinary Authority:** Disciplinary Authority means, authority specified by the company from time to time and notified for the information of the employees. The Company may appoint or specify different disciplinary authority for employees at different levels or grades. (Refer to the Appendix for the Disciplinary Authority)

**Appellate Authority:** Appellate Authority means, authority specified by the company from time to time and notified for the information of the employees. The Company may appoint or specify different Appellate Authority for employees at different levels or grades. (Refer to the Appendix for the Appellate Authority)



#### DISCLAIMER

The policy is meant to serve a guideline for the employees. Nothing contained in the policy shall be construed to confer any legal right or entitlement on any individual or team(s) mentioned in the policy unless specified by law. The Organization reserves an unconditional right to amend, modify and/or rescind the entire policy or part of it at any point in time. Management decision is final.