

Sexual Harassment – Prevention & Redressal Policy

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I. Scope

This Sexual Harassment – Prevention & Redressal Policy (“this Policy”) is effective **April 1st, 2016** and supersedes any previous policy and/or practice on sexual harassment redressal. This Policy applies to all employees (including permanent, fixed-term, contractual and temporary staff) of Snapdeal Limited and its subsidiaries (collectively referred to as the “Company”).

This Policy also extends to and prohibits sexual harassment of any of Snapdeal’s customers, consultants, clients, vendors or suppliers and other persons present at Snapdeal’s workplace.

NOTE: For all other forms of workplace harassment and redressal mechanism, please refer to the “**Workplace Harassment – Prevention & Redressal Policy**”.

II. Purpose

Snapdeal absolutely prohibits sexual harassment in any form. This Policy is gender –neutral and aims to define sexual harassment & related misconduct, highlight the guidelines of reporting an instance of such harassment and the procedure for redressal of complaints regarding harassment. Sexual Harassment is against the Company policy and the violation of the same can attract penalty to an extent defined under the “Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013.

III. Definitions

A. Complainant

The individual reporting the incident of harassment is considered to be the Complainant. The said Complainant can be the individual being subjected to the harassment or someone who is a witness to the same, except during the Process of Enquiry. During the Process of Enquiry, only the person subjected to sexual harassment will be considered as the Complainant.

B. Harassment

Any slurs, offensive remarks, jokes, other verbal, graphic or physical conduct, of a discriminatory, disrespectful and offensive nature, that offends the dignity and interferes with the work performance and effectiveness of its target individual.

C. Workplace

This includes:

- i. Physical environment of the work place

- ii. Virtual work environment, when individuals are working from home and connected remotely through emails, phones, video conferencing, instant messaging applications, social media platform and;
- iii. All events which an employee/individual participates in, due to professional or business requirement including conferences, business trips and company sponsored social events.

Any harassment conducted via telephone or email or video calls or SMS or instant messaging or any other mode of communication is considered to be a part of the extended workplace if it is associated with Snapdeal directly.

D. Hostile Environment

Creation of an intimidating and/or offensive work environment as a direct or indirect result of harassment, where the employee/individual subjected to harassment, considers his/her dignity and safety to be threatened.

E. Respondent(s)

The individual/s OR employee/s perpetrating the actions which can be, individually or collectively, construed as harassment.

F. Ex-parte

Ex-parte literally means “for one party” and refers to hearings or orders being granted on the request of and for the benefit of one party only.

As per this Policy if the Respondent(s) fail to participate in the inquiry after being provided due notice and fair opportunity to participate and defend him/her, the inquiry or proceeding is conducted ex-parte.

G. Prima Facie

Prima facie literally means “as it seems at first sight”. As per this Policy, if the Complaint on Harassment seems to be substantial to the Internal Complaints Committee at the first glance, the case is investigated further.

H. Subsistence Allowance

Subsistence Allowance means a monthly allowance paid to an employee under suspension. Subsistence Allowance comprises of 50% of Basic Pay, full HRA and Special Allowance, reimbursement of telephone expenses (on actual) and Medical Facilities.

IV. Policy Statement

Snapdeal absolutely prohibits sexual harassment in any form. Snapdeal is a company incorporated under the provisions of the Companies Act, 1956 having its principal place of business at M3M Urbana Business Park, Sector-67, Gurugram, Haryana. Snapdeal is committed to maintaining a work environment free of sexual harassment and takes strict action against any form of such harassment.

The Company wants to assure all its employees that complaints will be dealt with in absolute confidence and measures will be undertaken to protect the Complainant from any further acts of harassment, coercion, intimidation and/or from retaliation due to their reporting an incident, and/or participating in an investigation or proceeding, concerning the alleged harassment.

A. Prohibited Conduct

Any misconduct or behaviour that is sexually offensive and creates a hostile environment in the workplace is a violation of this Policy and will be treated as a disciplinary matter.

The definition of work place is not restricted to physical environment of the work place; it takes into account the access that a perpetrator has to the harassed, by virtue of a job situation or work relation.

Snapdeal urges any employee/individual facing or being subjected to any instance of sexual harassment to file a formal complaint, to enable prompt redressal of the offense. You are facing an instance of unlawful harassment when:

- The continuity of your employment with Snapdeal is made subject to your submission to such offensive conduct (either explicitly or implicitly)
- Your submission to or rejection of such offensive conduct, is used as a basis for decisions regarding your employment, career opportunities and/or compensation
- Such offensive conduct unreasonably interferes with your work performance, affects your health or creates an intimidating, hostile or offensive working environment for you
- You are being subjected to comments or conduct of a sexual nature unwelcome to you

The excuse that the employee/individual perpetrating the same was "only joking" or "didn't think that the other employee would object" is an unacceptable response to such a complaint. If the comments or conduct are such that you or other employees might object to it, they are unacceptable at the workplace.

B. Right to work in a Free Environment

Every employee shall have a right to be free from Sexual Harassment and the right to work in an environment free from any form of Sexual Harassment. Preventing the menace of sexual harassment and making the premises and work place free of sexual harassment will be the moral responsibility and accountability of Snapdeal starting from the Management to the lowest level employee. Such persons will be bound to take immediate action if any case of sexual harassment is noticed or reported by any staff of the company.

C. Sexual Harassment

Sexual harassment is an unlawful conduct, which undermines the integrity of the employment relationship. Therefore, it is unacceptable in the workplace and the management at Snapdeal does not tolerate such conduct. Snapdeal prohibits all sexual advances and not just those that are

unwelcome.

- A. The term "Sexual Harassment" includes slurs and any other offensive remarks, jokes, other verbal, graphic or physical conduct. It may include but is not limited to any one or more of the following unwelcome acts or behaviour, committed explicitly or implicitly:

- Physical contact and advances; or

- A demand or request for sexual favours; or
 - Making sexually coloured remarks; or
 - Showing pornography; or
 - Implied or explicit promise of preferential treatment to an employee's with respect to his/her employment; or
 - Implied or explicit threat of detrimental treatment to an employee with respect to his/her employment; or
 - Implied or explicit threat to an employee regarding his/her present or future employment status; or
 - Interference with his/her work or creating an intimidating or offensive or hostile work environment for him/her; or
 - Humiliating treatment likely to affect his/her health or safety
 - Offering employment benefits in exchange for sexual favours
 - Making or threatening reprisals (revenge) after a negative response to sexual advances
 - Visual and/or non-verbal conduct, including leering, making sexual gestures, showing pornography, displaying sexually suggestive objects or pictures, cartoons, or posters
 - Verbal conduct, including making or using derogatory comments, sexually colored remarks, epithets (nickname/appellation), slurs, and jokes
 - Verbal and/or written abuse of a sexual nature, graphic verbal commentaries about an individual's body, sexually degrading words used to describe an individual, suggestive or obscene letters, notes, or invitations
 - Physical conduct, including touching, assault, impeding or blocking movements, standing at a close distance that would make the other person uncomfortable
 - Stalking and/or voyeurism
- B. Sexual Harassment in virtual work environment may include, but is not limited to any one or more of the following unwelcome acts or behaviour, committed explicitly or implicitly :
- Sexual Jokes or Off-Color Comments in the Company Messaging App
 - Sending Sexts or Video-Chat Exposures
 - Sharing screen during work related video call & showing pornography or inappropriate content

- Video calls at odd times
- Inappropriately or under-dressed colleagues during video calls
- Compelling employees to join in 'night suit' video conference parties

- Taking video calls lying on a couch or bed
- Insisting someone to turn on video, even if they say they are not comfortable to do so.
- In a virtual meeting, participants are privy to a poster with provocative content on the wall of one of the participants
- Sharing inappropriate jokes on a video call to “lighten the mood” and to “build camaraderie”
- Other unwelcome physical, verbal or non-verbal conduct of a sexual nature

Sexual harassment at the work place also takes into account the access that a perpetrator has to the harassed, by virtue of a job situation or work relation. In the event that you feel you are being harassed sexually outside Snapdeal premises such as, at conferences, on business trips, at company sponsored social events, via telephone or email and/or even during the pick-up, drop or while you’re availing transport organized by the Company or during a business trip, including transportation provided by the employer for undertaking such journey; if it is associated with Snapdeal or its workplace, it will be considered to be sexual harassment at workplace and strict action will be taken against the offender.

V. Sexual Harassment Redressal Committee

The Company has constituted a Committee (the “Internal Complaints Committee”) including representatives from all of its administrative units or offices, as a part of creating the appropriate complaint mechanism for redressing complaints regarding Sexual Harassment. Generally, it takes a minimum of fifteen (15) days from the day the procedure is initiated, to redress the complaint in question. The timeline however, serves as a guideline and is subject to change, based on the circumstances.

Internal Complaints Committee Constitution:

- The Company shall have a Complaints Committee comprising of a minimum of 3 members
- The Complaints Committee shall be chaired by a woman of adequately senior position
- Not less than half of the members of the Complaints Committee shall be women
- The Complaints Committee shall appoint/co-opt a nominee from an NGO or any other person who is familiar with the subject of sexual harassment, as a third party member
- Changes in the constitution of the Complaints Committee, whenever necessary, shall be made as expeditiously as possible and in any case within fifteen (15) days of the date of vacancy of office by one of the members
- The Presiding Officer and other members of the Committee, will retain office up to a maximum term

of three (3) years from their date of nomination

All employees who believe that they have experienced or witnessed harassment are strongly urged to notify the Internal Complaints Committee. Any employee who experiences sexual harassment can get in touch with any member of the committee whose contact details are provided below.

Please refer to the **Appendix** on page 17 for a list of the present members of the Internal Complaints Committee, appointed to deal with the complaints of sexual harassment in accordance with the guidelines laid down by the Supreme Court of India.

VI. Suggested Measures for Complainant

The section lays down broad suggested measures that can be taken by an employee who has been subjected to sexual harassment.

- The Complainant needs to understand when he/she is being subjected to sexual harassment. Such misconduct has been defined under “Sexual Harassment” in Section IV at page 5 and 6 of this policy
- Some examples of Sexual Harassment :
 - Unwarranted continuous late sitting at work with alleged respondent
 - Pestering or stalking a person
 - Uncomfortable proximity
 - Regular Late night meetings at house or outside office
 - “Accidentally on purpose” brushing against a person
- It is advisable for the Complainant to let a person know if his/her behaviour and gestures are unwelcome or if they make you feel uncomfortable. Whether it is a manager or a colleague, such misconduct is illegal, and if their actions are affecting how you work, you need to get them to stop.
- The Complainant can further share the incident with friends/ family/ any colleague at work/ Human Resources/ Reporting Manager/ Head of department/ legal department. They may not have a solution to the issue, but they may guide you to the further recourse.
- The Complainant may keep a record of incident(s), including date, time, location, possible witness (if any), what happened, one’s response to the incident etc.
- Such record of events is not mandatory to be kept, but a record can strengthen the case and help you remember the details over time, in case the Complaint is not filed immediately.
- It is advisable to file a complaint and report the abuse to the Internal Complaints Committee as soon as possible.

VII. Sexual Harassment Complaint Redressal Procedure

The procedure to redress Sexual Harassment Complaints is listed below:

- If you are being subjected to or have been subjected to sexual harassment or have witnessed someone else being subjected to such harassment, you can file a written complaint with the Human Resource Department or your HRBP or send an email to the Internal Complaints Committee at ICC@snapdeal.com, within a period of three (3) months from the date of the incident.

NOTE: The Reporting Manager and Head of Department are firmly advised to not attempt to address any complaints of sexual harassment. In view of the sensitivity & confidentiality related to such matters, only the HR Department and ICC are authorized to act upon these complaints.

- In case you file the complaint with the Human Resource Department, the Human Resource (HR) Representative of that respective location, will scan the complaint and mail it to ICC@snapdeal.com within 24 hours of receiving the complaint. All complaints shall be treated as highly confidential

- If an employee has been a victim of sexual harassment and is unable to register a complaint by himself/herself, on account of physical/mental incapacity and/or death or otherwise, the legal heir or representative of the aggrieved employee can register the complaint

- Post receipt of such a complaint in the mailbox, the pre -designated Internal Complaints Committee, will review the complaint and initiate the preliminary enquiry. If the committee is satisfied that there is a prima facie cause to believe that your complaint is substantial, the case will be investigated further

- Following this, the Internal Complaints Committee holds a discussion with the Complainant (hereon, the “Complainant” refers to the individual who is being/has been harassed). His/her concerns regarding Snapdeal’s policy on redressal of sexual harassment and the redressal process are addressed. The Committee also reserves the right to request further details from the Complainant, to verify the authenticity of the complaint

- The investigation conducted may be recorded on camera, with a view to ensure confidentiality to the extent practicable. In case the Complainant wishes not to have their identity revealed, his/her identity will be kept confidential and will not be revealed to the respondent.

-Options of Redressal - The following options of redressal are available to the Complainant under the policy:

- I. **Conciliation Process** – This exercise may be attempted in case the alleged incident is either centred on a misunderstanding on behalf of the complainant, rather than a gross misconduct or if the extent of the misconduct is not outrageous.

Only if the Complainant agrees, the Internal Committee may take steps to settle the matter between Complainant and Respondent by conciliation. However, no monetary settlement shall be made as a basis of the reconciliation.

It is also to be noted, in case of misconduct when both parties have reconciled, the case will still be recorded in employee records of the Respondent. This will be taken into account while assessing performance as well as will help form a strong case, in case of any repeat offence.

- II. **Formal Enquiry through Internal Complaints Committee** – The committee initiates enquiry in case Conciliation has not resulted in any settlement or if any term or condition of the settlement arrived through conciliation, has not been complied with by respondent

VIII. Process of Enquiry

- Post preliminary enquiry, when Conciliation does not take place the Committee frames the charges, draws up a charge sheet and issues a Show Cause to the Respondent(s). In this Notice, the

Respondent(s) is provided an opportunity to submit a written explanation, with respect to the charges levelled against him/her, within forty-eight (48) hours post receipt of the notice

- If the Respondent seeks additional time for submitting the explanation, additional time of up to forty-eight (48) hours will be granted to him/her at most, subject to the consideration of reasonability and the time-line mentioned in the paragraph herein

- In the event that the situation does not warrant a suspension, the Respondent continues to be on duty

- However, if evidence suggests that the situation warrants a suspension, the Respondent is suspended, to protect the Complainant and/or the subject of harassment (if he/she is another individual), from any further victimization or a possibility of a backlash due to the complaint and to safeguard other employees and company property from any possible risk

- If the Respondent admits to the charge unconditionally, further enquiry is neither required nor conducted. The Disciplinary Authority (HR Management), basis ICC recommendation, may impose any corrective action, depending on the gravity of the offense. The corrective action may include:

1. Verbal Warning
2. Written Warning
3. Final Written Warning
4. Termination

The detailed course of action & its impact has been added as **Appendix** on Page 16

- Where such conduct amounts to a specific offence under the Indian Penal Code or under any other law, the Disciplinary Authority (HR Management) shall initiate appropriate action in accordance with law

- The Internal Complaints Committee reserves the right to summon any person, whose inputs it considers relevant to the case and interview him/her as part of the formal enquiry. Subsequently the following actions are taken:

- A written statement is obtained from all the parties involved (the Complainant, the Respondent and the witnesses, if any)
- These statements are reviewed. Following this, the Internal Complaints Committee may further interview the witnesses if required and record their additional statements
- Any evidence found or used during the investigation in the form of documents or any other material, are recorded and considered by the Internal Complaints Committee
- The Internal Complaints Committee prepares a Complaint Investigation Report, describing the facts of the case and its various details chronologically

- A summon to appear for a hearing before the Internal Complaints Committee is sent to the Respondent via registered post.
- If the Respondent fails to participate in the inquiry after being provided due notice and fair opportunity to defend him/her, the Internal Complaints Committee adjourns the meeting and the Respondent is sent a copy of the minutes of the meeting via registered post

- The Internal Complaints Committee may, according to its discretion, allow personal hearings for the Complainant, the Respondent and the witnesses (if any), on an individual basis, if so requested by either the Complainant, witnesses or the Respondent(s)
- During the course of investigation, a copy of Enquiry Report and the recorded evidence may be provided to the respondent(s)
- Audio and video recordings of all such hearings may be maintained by the Internal Complaints Committee, as far as possible
- The Internal Complaints Committee reviews the circumstances, evidence and all relevant statements to make its recommendations. It is not required to follow strict rules of evidence in such enquiries, but shall make its recommendations based on principle of “preponderance of probability”
- After the proceedings and the consideration period, the Internal Complaints Committee reaches a decision and prepares the final Complaint Investigation Report based on its findings and recommendations
- Findings of the Committee: The Committee shall submit a report of its findings and recommendations to the Disciplinary Authority (HR Management) within a period 15 (fifteen) days from the date of completion of the inquiry
- The findings of the report will be made available to the concerned employees (the Complainant and the Respondent). In case the Complainant has requested not to have their identity revealed, then the identity of the Complainant will be held confidential and will not be revealed in the report
- The Disciplinary Authority (HR Management) shall act upon the Committee’s recommendation within 15 (fifteen) days of its receipt
- The Disciplinary Authority (HR Management) reviews the findings and the evidence on record and takes a considered decision, either acquitting or confirming the charges against Respondent (s). In cases where the charges are confirmed, the Disciplinary Authority (HR Management) will impose corrective action as mentioned on Page 10 under the section – **Process of Enquiry**
- The case shall be redressed within a period of Thirty (30) days. This includes the process of enquiry, formulation of the report, sharing the report with its findings and recommendations to the Disciplinary Authority (HR Management) and the appropriate disciplinary action being taken

IX. Exceptional Cases:

In exceptional cases, measures can be taken to provide Interim Relief to the Complainant.

The Committee can offer to make arrangements for the Complainant to avoid uncomfortable

interaction with the Respondent, including transferring the team, changing reporting manager, allowing working from home etc.

If the Respondent is required to be kept under suspension pending domestic enquiry, Subsistence Allowance is provided during this time. The provision of Subsistence Allowance to Respondent shall be subject to the approval of Vice President, Human Resources.

X. False/ Malicious Complaint

- In case the Committee arrives at a conclusion that the allegation against the respondent is false or malicious, the Committee may recommend that appropriate action be taken against the Complainant and/or against any witness who has given false evidence, up to and including termination of service. The Disciplinary Authority (HR Management) will impose recommended corrective action as cited on Page 10 under the section – **Process of Enquiry**

XI. Conformance to Statutory Guidelines

- Snapdeal shall maintain a complete written record of each complaint and how it was investigated and resolved
- The Annual Returns mandated under the “Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013” shall be submitted within stipulated timelines, including details on :
 - Number of complaints of Sexual Harassment received during the year
 - Number of complaints of Sexual Harassment disposed during the year
 - Number of complaints pending for more than 90 days
 - Nature of action taken
 - Number of sensitization workshops conducted during the year
- All the new employees shall undergo an Orientation programme on Prevention of Sexual Harassment at workplace within 30 days of joining and shall mandatorily go through online refresher training once a year
- Regular Sensitization workshops shall be conducted for all employees on Prevention of Sexual Harassment at Workplace and the records of the same shall be maintained
- Written records shall be maintained in a confidential manner

XII. Report Retaliation Actions

Employees are protected against retaliation by a supervisor or a vendor for reporting complaints under this policy. Employees, who in good faith, report that they believe there has been a violation of this policy or who co-operate in an investigation will not suffer any retaliation by Snapdeal. Any employee who has been the victim of retaliation should immediately report the retaliatory acts in any of the following ways:

- Report directly to the Associate Vice President/ Vice President, Human Resources

- Report via email to ICC@snapdeal.com

Snapdeal prohibits all its employees from hindering its internal investigations and expects full co-operation from all employees. All complaints of harassment that are reported to management will be investigated as promptly as possible and will be kept strictly confidential.

XIII. Responsibility

A. Corporate Responsibility

There is both a corporate obligation and an individual obligation to fulfil the intent of this Policy. The excerpts of the Policy shall be prominently displayed in all of Company's premises and it is expected that you as an employee, will have a working knowledge of permissible activities in your workplace and will seek guidance from the Human Resources Department, the Internal Complaints Committee or the Legal Department concerning any matter in which there is any question, in strict confidence.

B. Managerial and Supervisor Responsibility

It is the responsibility of all Officers, Managers and Directors of the Company and subsidiary companies, to make the content of this policy known to every employee in their respective organizations and also to administer the execution of all applicable provisions.

Managers must ensure that nobody is subject to harassment and there is equal treatment amongst all. They must sensitize the team about such misconduct.

They must also ensure that all employees understand that harassment will not be tolerated; that complaints will be taken seriously; and that the complainant, respondent/s, or witnesses shall not be victimized in any way.

C. Legal Team Responsibility

The Legal Department is responsible for review and interpretation of the laws and should be called upon for guidance and counsel if any questions arise, regarding the application of this policy.

D. Employee's Responsibility

All employees of Snapdeal should read, understand and abide by the policy. As an employee, you too are responsible for your own behaviour and for that of others to some extent.

- Snapdeal expects you to behave respectfully and professionally at all times. Please remember that your actions reflect upon yourself and the Company

- You are also expected to behave with sensitivity and understanding towards your colleagues, peers, juniors and seniors at all times. In the event that you find someone feeling uncomfortable because of your actions, apologise to them and do not repeat the same. Similarly, if someone else's actions and/or behaviour offend you, let that person know respectfully so that it does not happen again

- Constructive feedback about lapse in performance or less than expected appraisals, rewards & recognition, should not be construed as misconduct. The employees are urged not to misuse the

provisions of the policy to report false complaints under sexual harassment.

- Please report any behaviour that may constitute sexual harassment

These guidelines are formulated to protect both genders and are unbiased towards sexual orientation.

XIV. Administration of the Policy

The Human Resource Department is responsible for administering, tracking and communicating this Policy and answering any questions that may arise. The Vice President, Human Resources will be responsible for any interpretation of this Policy. Management shall assist in the implementation of this policy by disseminating it within their departments and ensuring its implementation. All supervisory personnel must ensure that this policy is properly administered for all employees. Violations of this policy may result in disciplinary action up to and including termination of employment.

XV. Breach of the Policy

The Company reserves the right to take disciplinary action or initiate criminal proceedings as and when it considers necessary in respect of all reported cases of violation of this policy. Disciplinary action may include termination of services of employees and/or legal action against those who violate the spirit of this policy, regardless of whether unlawful conduct has actually occurred or not. This Policy document is made available at all locations of the Company with a clear objective to establish the standard approach in addressing issues discussed in this Policy.

XVI. Policy Changes

The Human Resource (HR) department is the Custodian of the Policy. On behalf of Snapdeal, the HR Department has the absolute right, in its sole discretion, to interpret, modify, amend and/or terminate this Policy with respect to any employee, group of employees or in its entirety at any time. The decision to terminate or amend may be due to changes in law or any other reason. If the Policy is terminated, an individual will not have any further rights under this Policy. This Policy does not create an obligation for continued employment or imply an employment contract.

XVII. Appendix – Course of Action

Course of action	Ineligibility for IJP	Loss of L&D Opportunities	Ineligibility for Rewards & Recognition	Negative Impact on Appraisal/ Increment	Ineligibility for Promotion	Demotion	Monetary Penalty	Ineligibility of Variable Bonus	Forfeiture of ESOPs	Ineligibility of Retention Bonus
Verbal Warning	Applicable	Applicable	Applicable	NA	NA	NA	NA	NA	NA	NA
	For 6 months from Date of Issuance	For 6 months from Date of Issuance	For 6 months from Date of Issuance							
Written Warning	Applicable	Applicable	Applicable	Applicable	Applicable	NA	NA	NA	NA	NA
	For 12 months from Date of Issuance	For 6 months from Date of Issuance	For 12 months from Date of Issuance	For 12 months from Date of Issuance	For 12 months from Date of Issuance					
Final Written Warning	Applicable	Applicable	Applicable	Applicable	Applicable	Applicable	Applicable	Applicable	Applicable	Applicable
	For 12 months from Date of Issuance	For 12 months from Date of Issuance	For 12 months from Date of Issuance	For 12 months from Date of Issuance	For 12 months from Date of Issuance	Upto one level down	As per ICC's recommendation	As per ICC's recommendation	Unvested	As per ICC's recommendation
Termination	NA	NA	NA	NA	NA	NA	Applicable	Applicable	Vested & Unvested	NA

The corrective course of action & degree of impact listed above may be altered at the discretion of the Vice President, Human Resources.

XVIII. Appendix – Internal Complaints Committee Member

Sr. No.	Name:	Designation	Level	Location	Contact No.	E-mail ID
1	Kanika Mehra	Associate Director	Presiding Officer	Gurgaon	9811079733	kanika.mehra01@snapdeal.com
2	Prankur Chaturvedi	Senior Director	Committee Member	Gurgaon	9987017749	prankur.chaturvedi@snapdeal.com
3	Sandeep Singh Sachdeva	Senior Director	Committee Member	Gurgaon	9654400409	sandeep.sachdeva01@snapdeal.com
4	Payal Mittal	Senior Software Engineer	Committee Member	Gurgaon	9729262926	payal.mittal@snapdeal.com
5	Jayaprada	Third Party Member	Committee Member	Gurgaon	9880711690	jayaprada@posh.metisindia.com

XIX. Document Change Tracker

Sr. No.	Version:	Date	Change	Section	Page No.	Updated By	Reviewed By	Approved By
1	1.0	12-Apr-15	Initial Draft	All	All	Tashaona Siqueira - Manager, Human Resources	Santosh Rao – Associate Director, Human Resources	Pravin Kutty – Senior Director, Human Resources
2	1.1	09-Dec-15	Appendix	XV	14	Ashish Saxena- Assistant Manager, Human Resources	Santosh Rao – Associate Director, Human Resources	Saurabh Nigam – Vice President, Human Resources
3	1.1	09-Dec-15	Snapdeal Logo	All	All	Ashish Saxena - Assistant Manager, Human Resources	Santosh Rao – Associate Director, Human Resources	Saurabh Nigam – Vice President, Human Resources
4	1.2	20-Jan-16	Change in the list of ICC Members	XV. Appendix	14	Ashish Saxena - Assistant Manager, Human Resources	Santosh Rao – Associate Director, Human Resources	Saurabh Nigam – Vice President, Human Resources
5	1.3	01-Apr-16	Change in Year	All	All	Ashish Saxena - Assistant Manager, Human Resources	Pravin Kutty – Associate Vice President, Human Resources	Saurabh Nigam – Vice President, Human Resources
6	1.4	10-Aug-16	Change in the list of ICC Members	XV. Appendix	14	Ashish Saxena - Assistant Manager, Human Resources	Santosh Rao – Director, Human Resources	Saurabh Nigam – Vice President, Human Resources

	1.4	10-Aug-16	Change of ICC Mailbox	XV. Appendix	14	Ashish Saxena - Assistant Manager, Human Resources	Santosh Rao – Director, Human Resources	Saurabh Nigam – Vice President, Human Resources
8	1.5	12-Sep-2016	Snapdeal logo	All	All	Ashish Saxena - Assistant Manager, Human Resources	Santosh Rao – Director, Human Resources	Saurabh Nigam – Vice President, Human Resources
9	1.6	01-Jun-2017	Policy Control Authorities	All	All	Avinash Manoharan - Manager, Human Resources	Santosh Rao-Senior Director, Human Resources	Pravin Kutty – Associate Vice President, Human Resources
10	1.7	12-Feb-2018	Change in the list of ICC Members	XV. Appendix	14	Avinash Manoharan - Manager, Human Resources	Santosh Rao-Senior Director, Human Resources	Pravin Kutty – Associate Vice President, Human Resources
11	1.8	12-Jun-2018	Change in the list of ICC Members	XV. Appendix	14	Avinash Manoharan - Manager, Human Resources	Santosh Rao-Senior Director, Human Resources	Pravin Kutty – Associate Vice President, Human Resources
12	1.9	05-Oct-2018	Change in the list of ICC Members	XV. Appendix	14	Avinash Manoharan - Manager, Human Resources	Santosh Rao-Senior Director, Human Resources	Pravin Kutty – Associate Vice President, Human Resources
13	2.0	01-Mar-2019	Change in the list of ICC Members	XV. Appendix	14	Navdeep Rattan – Deputy Manager, Human Resources	Santosh Rao-Senior Director, Human Resources	Pravin Kutty – Associate Vice President, Human Resources
14	2.1	20-Mar-2019	Company Name Change Jasper Infotech Pvt. Ltd.to Snapdeal Pvt. Ltd.	All	All	Navdeep Rattan – Deputy Manager, Human Resources	Santosh Rao-Senior Director, Human Resources	Pravin Kutty – Associate Vice President, Human Resources
15	2.2	15-July-2019	Separate Policy on Sexual Harassment-Prevention & Redressal.	Scope, Policy Statement, Procedure & Process of Redressal	All	Hina Chhikara – Deputy Manager, Human Resources	Santosh Rao-Senior Director, Human Resources	Pravin Kutty – Vice President, Human Resources
16	2.3	1-July-2020	Redefinition of Workplace Policy Statement : Sexual Harassment Change in the list of ICC Members	III. Definitions IV. Policy Statement XVIII. Appendix	3, 5, 16	Hina Chhikara – Manager, Human Resources	Santosh Rao – Associate Vice President, Human Resources	Pravin Kutty – Vice President, Human Resources
17	2.4	1-Sept-2020	Closure of Regional Office	XVIII. Appendix	16	Hina Chhikara – Manager, Human Resources	Santosh Rao – Associate Vice President, Human Resources	Pravin Kutty – Vice President, Human Resources

18	2.5	09-Dec-2021	Company Name Change Snapdeal Pvt. Ltd. to Snapdeal Ltd	All	All	Navdeep Rattan – Manager, Human Resources	Santosh Rao – Associate Vice President, Human Resources	Pravin Kutty – Vice President, Human Resources
19	2.6	18-May-2023	Change in the list of ICC Members	XVIII. Appendix	16	Navdeep Rattan – Manager, Human Resources	Santosh Rao – Associate Vice President, Human Resources	Pravin Kutty – Vice President, Human Resources
20	2.7	03-Oct-2023	Change in the list of ICC Members	XVIII. Appendix	16	Navdeep Rattan – Manager, Human Resources	Santosh Rao – Associate Vice President, Human Resources	Pravin Kutty – Vice President, Human Resources
21	2.8	08-May-2024	Change in the list of ICC Members	XVIII. Appendix	18	Navdeep Rattan – Manager, Human Resources	Santosh Rao – Associate Vice President, Human Resources	Pravin Kutty – Vice President, Human Resources
22	2.9	20-Aug-2024	Change in the list of ICC Members	XVIII. Appendix	16	Navdeep Rattan – Manager, Human Resources	Santosh Rao – Associate Vice President, Human Resources	Pravin Kutty – Vice President, Human Resources