

**POLICY ON PREVENTION OF SEXUAL
HARASSMENT & FORMATION OF INTERNAL
COMMITTEE (IC)**

L&T Technology Services HR

Version 2.6 | June 2026

Policy on Prevention of Sexual Harassment & Formation of Internal Committee (IC)

Record of Release

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1.0	Rashmi Shankar	Sonal Vaidya, Asmita Dhopeswarkar & Sridhar Natarajan	Paneesh Rao	Apr-16	First Release
1.1	Rashmi Shankar	Sonal Vaidya, Asmita Dhopeswarkar & Sridhar Natarajan	Paneesh Rao	Apr-16	Inclusion of Internal Complaint Committee (ICC)
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1.4	Rashmi Shankar	Sonal Vaidya	Paneesh Rao	Mar-18	Added Gurgaon and Pune along with Bangalore ICC
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1.6	Rashmi Shankar	Sonal Vaidya	Paneesh Rao	Aug-18	Replaced ICC (Internal Compliant Committee) with IC (Internal Committee and updated the list
1.7	Rashmi Shankar	Sonal Vaidya	Lakshmanan M	Jul-19	Updated the IC and the members of the IC
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1.9	Rashmi Shankar	Sonal Vaidya	Lakshmanan M	Aug-21	Updated the list of IC members
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2.1	Rashmi Shankar	Sonal Vaidya/John Maria Viannie	Lakshmanan M	May-23	Added Hyderabad & Delhi IC details, updated Blore, Mys, Chennai & Vadodara list
2.2	Rashmi Shankar	Sonal Vaidya/John Maria Viannie	Lakshmanan M	Jul-23	Updated the list of IC members
2.3	HR OD&E Team & HR Policy Team	HR Head - India	CHRO	Feb-2026	Updates to the list of IC members
2.4	HR OD&E Team & HR Policy Team	HR Head - India	CHRO	Apr-2026	Updates to the list of IC members: <i>Chennai-Kochi, Intelliswift</i>
2.5	HR OD&E Team & HR Policy Team	HR Head - India	CHRO	May-2026	Updates to the list of IC members: Chennai, Bangalore, Vadodara, Intelliswift
2.6	HR OD&E Team & HR Policy Team	HR Head - India	CHRO	June-2026	Added virtual workplace coverage and SHe-Box complaint registration link. Replaced IC member list with location-wise email IDs and access links.

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1. Introduction

L&T Technology Services Limited ("**LTTS**") is committed to providing and maintaining a work environment that is safe and free from sexual harassment. This policy has been developed in accordance with The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 ("**Act**") and The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Rules, 2013 ("**Rules**").

2. Scope

2.1 This policy applies to all Employees of LTTS, operating from India, irrespective of their level, rank or designation, across all departments, functions and operations. This Policy is also applicable to Employees visiting LTTS in India.

2.2. For the purpose of this Policy, 'Workplace' shall also include virtual work environments, including Work from Home arrangements, remote working locations, digital/online communication platforms, and any work-related interactions conducted through electronic means.

2.3. Where Sexual Harassment occurs as a result of an act of commission or omission by any Third Party, LTTS will take all steps necessary and reasonable to assist the Aggrieved Woman.

3. Objective

3.1. To enhance equal opportunity for men and women at the workplace;

3.2. To create a harassment free and friendly work environment;

3.3. To lay down the guidelines for reporting acts of Sexual Harassment at the workplace and procedure for the resolution and redressal of complaints of Sexual Harassment;

3.4. To provide a workplace that is free of inappropriate behavior of any kind.

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4. Guidelines

4.1 Compliance to this policy is a condition of each Employee's employment.

4.2 Every Employee has the right to work in a professional atmosphere that promotes equal employment opportunities and prohibits discriminatory practices, including harassment. Therefore, LTTS expects that all relationships among persons in the workplace will be free of bias, prejudice and harassment.

4.3 "Sexual Harassment" shall include any unwelcome acts or behaviors, whether directly or by implication namely:

- Physical contact and advances; or
- A demand or request for sexual favors;
- Making sexually - colored remarks;
- Showing pornography; or
- Any other unwelcome physical, verbal or non-verbal conduct of sexual nature.

4.4 "Circumstances of Sexual Harassment" means following circumstances, among other circumstances, if it occurs or is present in relation to or is connected with any act or behavior of sexual harassment may amount to sexual harassment:

- implied or explicit promise of preferential treatment in her employment; or
- implied or explicit threat of detrimental treatment in her employment; or
- implied or explicit threat about her present or future employment status; or
- interference with her work or creating an intimidating or offensive or hostile work environment for her; or
- humiliating treatment likely to affect her health or safety.

4.5 "Aggrieved Woman" means (i) in relation to a workplace, a woman, of any age whether employed or not, who alleges to have been subjected to any act of sexual harassment by the Respondent; (ii) in relation to a dwelling place or house, a woman of any age who is employed in such a dwelling place or house.

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- 4.6 "Employee"** means a person employed for any work on regular, temporary, ad hoc or daily wage basis, either directly or by or through an agent, including a contractor, with or without the knowledge of the principal employer, 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 domestic worker, a co-worker, a contract worker, probationer, trainee, apprentice or by any other name called. Explanation: The aforesaid definition of 'Employee' shall be used only for the purposes of the Policy and cannot be used to claim rights of an employee conferred by any law for the time being in force.
- 4.7 "Employer"** means (i) in relation to any department, organization, undertaking, establishment, enterprise, institution, office, branch or unit, the head of that department, organization, undertaking, establishment, enterprise, institution, office, branch or unit; (ii) in any workplace not covered under (i) above, any person responsible for the management, supervision or control of the workplace. Explanation: For the purposes of this definition "management" includes the person or board or committee responsible for formulation and administration of policies for such organization.
- 4.8 "Respondent"** means a person against whom the Aggrieved Woman has made a Complaint.
- 4.9 "Third Party"** means and includes any person not on the rolls of LTTS but interacts with the employees such as consultants, retainers, customers, vendors, suppliers, contract workers, trainees or any outside visitor within or outside LTTS.
- 4.10** This policy extends to all the offices and campus of LTTS, transport during work, work-related gatherings, etc., and is not restricted to the physical location.

5. Redressal Mechanism

- 5.1** Internal Committee ("IC") has been constituted for redressal of all sexual harassment complaints received under this Policy. - The LTTS IC Lists for each location may be found via the following links: Rainbow: [Rainbow](#); MyLTTS: [LTTS](#) (Path: MyLTTS>MyApps>HR>POSH)

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5.2 The IC will have the same powers as vested to Civil Court under the CPC with respect to summoning & enforcing attendance, examining on oath, requiring discovery & production of documents and such other matters

5.3 Constitution of IC

- Presiding Officer should be a woman employed at a senior level at workplace from amongst the Employees;
- Two Employees preferably committed to the cause of women or who have had experience in social work or have legal knowledge;
- One member from non-governmental organization (NGO) or associations committed to cause of women or a person familiar with the issues relating to sexual harassment.
- At least half of the members of IC should be women.
- The Presiding Officer and every Member of the IC shall hold office for such period, not exceeding three (3) years, from the date of their nomination as may be specified by employer. The Member appointed from amongst the NGO or associations shall be paid such fees or allowances for holding the proceedings of the IC, by the employer, as may be prescribed.

As mentioned hereinabove, the IC shall consist of minimum four members. While conducting the inquiry, it is mandatory that a minimum of three (3) Members of the IC (including the Presiding Officer or Chairperson) shall be present. Inquiry Committee shall preferably have one (1) external member from the IC.

6. Procedure for filing a Complaint

6.1 Any Aggrieved Woman who believes that She has experienced harassment should report the incident in writing immediately as per Annexure 2: Template for Reporting Sexual Harassment to the IC (within three (3) months of the incident) and in case of series of incidents within three (3) months from the date of last incident to the members of the IC.

Provided that where such complaint cannot be made in writing, the Presiding Officer or any Member of the IC shall render reasonable assistance to the Aggrieved Woman for making the complaint in writing.

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Provided further that the IC may, for the reasons to be recorded in writing, extend the time limit not exceeding three (3) months, if it is satisfied that the circumstances were such which prevented the Aggrieved Woman from filing a complaint within the said period.

- 6.2** In addition to the internal complaint mechanism, the Aggrieved Individual may also choose to lodge a complaint through the SHe-Box portal established by the Ministry of Women & Child Development, Government of India. The Internal Committee (IC) shall extend necessary support and coordination, wherever required, in such cases, in accordance with applicable law. LINK: <https://shebox.wcd.gov.in/>
- 6.3** Where the Employee is unable to make a complaint on account of her physical or mental incapacity or death or otherwise, her legal heir or such other person as may be prescribed under the Rules may make a complaint.
- 6.4** The Aggrieved Woman may also choose to resort to conciliation. On the request made by the Aggrieved Woman, before initiating the inquiry, the IC will take steps to settle the matter through conciliation. No monetary settlement shall be made as a basis of conciliation.
- 6.5** The IC will promptly and thoroughly investigate all reports of harassment as discreetly and confidentially as possible. However, investigation of such complaint will generally require disclosure to the Respondent. The IC will be conducting an Inquiry for investigation of the complaint as per the guidelines laid down.
- 6.6** The IC at the written request of the Aggrieved Woman may recommend to LTTS to restrain the Respondent from reporting on the work performance of the Employee or writing her confidential report and assign the same to another officer.
- 6.7** Aggrieved Woman would be required to submit to the IC, six (6) copies of the complaint along with supporting documents and the names and addresses of the witnesses.
- 6.8** The goal is to conduct a thorough investigation, to determine whether harassment has occurred and to eliminate any hostile or offensive working condition and decide actions to take against the Respondent.

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7. Procedure for Addressing complaints by IC

- 7.1** On receipt of the complaint, the IC shall send the complaint to the Respondent within a period of seven (7) working days. The Respondent will be directed to submit his / her response within a period not exceeding ten (10) working days from the date of receipt of the documents.
- 7.2** The IC shall make inquiry into the complaint in accordance with the principles of natural justice and Disciplinary Inquiry.
- 7.3** The parties shall be given reasonable opportunity of being heard and a copy of the findings by the IC shall be made available to them.
- 7.4** The IC would complete the inquiry within ninety (90) days of the receipt of the formal written complaint by the IC. In case the time limit of ninety (90) days is exceeded, the same will be clearly explained in the final report submitted by the IC.
- 7.5** Parties shall not be allowed to bring in any legal practitioner to represent them in their case at any stage of the proceedings before the IC.
- 7.6** In cases, where the IC deems fit and necessary, the IC will forward the complaint to police within seven (7) days for registering a criminal case under 509 Indian Penal Code or relevant state authorities as it deems appropriate.

8. Relief provided to Aggrieved Woman during the inquiry

Upon finding sufficient reasons to do so, the IC may recommend:

- Transfer of the Aggrieved Woman or the Respondent to any other workplace;
- Grant leave to the Aggrieved Woman up to a period of three (3) months; this leave will be in addition to the leave otherwise entitled; or
- Grant such other relief to the complaining as required / found appropriate under the circumstances.

9. Findings and Recommendations of the IC

- 9.1** IC will provide a report of its findings within 10 days from the date of completion of inquiry and such report shall be made available to the parties concerned. It must be ensured that the identity of the witness is kept strictly confidential.

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- 9.2** IC may recommend to the Employer to take any action including a written apology, warning, reprimand or censure, withholding of promotion, withholding of pay rise or increments, terminating the perpetrator from service or undergoing a counselling session or carrying out community service on completion of the Inquiry.
- 9.3** False or malicious accusations of Sexual Harassment can have serious or devastating effect on innocent Employees. All Employees should note that Complaints of Sexual Harassment should be factual and true. If after investigation it becomes clear that the Aggrieved Woman or any other person making the Complaint, made false accusation (including producing forged or misleading document) against the Respondent, the Aggrieved Woman or any other person making the Complaint would become liable for appropriate disciplinary action.
- 9.4** A copy of the full enquiry report along with all the annexures of the complaint post completion of investigation process shall be made available by the IC to employer.
- 9.5** LTTTS commits to act upon the recommendations of the IC within 60 days of its receipt of report sent by the IC.

10. Duty of Employer

- 10.1** Prevent and prohibit all and any acts of harassment, including Sexual Harassment, in order to ensure a safe and healthy work environment.
- 10.2** Redress and resolve grievances pertaining to sexual harassment.
- 10.3** Take the following proactive steps:
- 10.3.1** Display the penal consequences of the acts of sexual harassment at all conspicuous places.
 - 10.3.2** Conduct regular workshops and employee awareness programs for gender sensitization.
 - 10.3.3** Create forum for open dialogues for creating sensitization towards gender issues and also address various concerns and issues highlighted thereof.
 - 10.3.4** Orientation programs to be conducted for the IC.
 - 10.3.5** Conduct capacity building and skill building programs for the Members of the IC.
 - 10.3.6** Monitor timely submission of the reports including Annual Report by the IC.
 - 10.3.7** To ensure timely submission of the Annual Report by the IC to the District Officer. The Report shall contain details as to number of complaints of sexual harassment received in the year; number of complaints disposed-off during the year; number of cases pending for more than ninety (90) days; number of workshops or

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awareness program against sexual harassment carried out; and nature of action taken by the Employer. The District Officers will in-turn forward the report to the concerned State Govt.

10.3.8 Timely and efficient enactment of the recommendations received from the IC.

10.3.9 To assist the Aggrieved Woman in filing an official complaint with the concerned authorities under the Indian Penal Code.

11. Annual Report

The IC as the case may be, shall in each calendar year prepare, in such form and at such time as may be prescribed, an annual report and submit the same to the Employer.

The IC shall include in its report the following:

- No. of cases received;
- No. of complaints disposed of;
- No. of cases pending for more than ninety (90) days;
- No. of workshops/awareness programmes carried out; Nature of action taken by the employer.

12. Confidentiality

The Minutes of the Meeting of the IC, the findings, recommendations, decisions of the Committees and any document or any verbal communication shall be kept strictly confidential, and the members shall not divulge the details to any other employee within LTTS or to any person outside L&T. Also, to other employees involved in such discussions, the members should emphasize the necessity for maintaining confidentiality and the consequences of possible disciplinary action in case of transgression.

13. Review

The L&T TS management reserves the right to revise, amend or modify this policy at any time and in any manner without notice. Any change or revision will be carried out by LTTS - Policy Team and communicated appropriately.

ANNEXURES

ANNEXURE 1: LOCATION-WISE INTERNAL COMMITTEE (IC) MEMBERS' EMAIL ADDRESSES

NOTE: The LTTS IC Lists for each location may be found via the following links: Rainbow: [Rainbow](#); MyLTTS: [LTTS](#) (Path: MyLTTS>MyApps>HR>POSH)

Location	Email Id
Mumbai & Pune	MumbaiPune.IC@ltts.com
Vadodara	Vadodara.IC@ltts.com
Bangalore	Bangalore.IC@ltts.com
Hyderabad	Hyderabad.IC@ltts.com
Delhi & Faridabad	DelhiFaridabad.IC@ltts.com
Mysore	Mysore.IC@ltts.com
Chennai & Kochi	ChennaiKochi.IC@ltts.com

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ANNEXURE 2: TEMPLATE FOR REPORTING SEXUAL HARASSMENT

To: The Committee for Protection of Women’s Rights at Workplace

Sexual Harassment Details:

Who is/are the person/s involved in this sexual harassment case? Please provide the name, designation, location, Business Unit and relationship with you (e.g. supervisor, colleague etc.)

Critical Incidents and Factual Data:

- a. Please describe the incident/s
- b. List of supporting information/data that the Committee can seek from you while investigating the Complaint.
E.g. exact date/s, place/s of incidents/s, witnesses, if any, text messages, pictures, emails etc.

Date: _____

Location: _____

Name of the Aggrieved Woman / Complainant: _____

Contact Information: _____

(Office Email ID/Mobile Number)

Signature of the Complainant: _____

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