

Anti-Harassment Policy

History:

Version	Date	Action
V1	May, 2022	New Policy
V2		

Document Control:

Particulars	Information
Date of Release and Effective Date	May, 2022
Review Date	March, 2022
Version No	V1
Document Owner	Vipul Sabharwal/Preeti Bajaj
Document Classification	External

Document Approvers

Version No.	Approver	Author
V1	Vipul Sabharwal/Preeti Bajaj	Sant Kumar Verma, Niharika Mohan Vohra and Ashish Kumar Pandey
V2		

Digitally signed by VIPUL
SABHARWAL
Date: 2022.05.16 12:11:58 +05'30'

PANDEY
ASHISH
KUMAR

Digitally signed by
PANDEY ASHISH
KUMAR
Date: 2022.05.16
14:22:17 +05'30'

Niharika Mohan Vohra


25/05/22

Purpose

This Policy supports Luminous's commitment to zero-tolerance on harassment including sexual harassment.

Objectives

The objective of this Policy is to define Luminous's position on harassment. This Policy is a minimum standard. Where local legislations define higher standards, Luminous entities will comply with them. As set forth in our Trust Charter, Luminous complies with local laws in every country where it operates.

Audience

This Policy applies to Luminous and all operating companies and subsidiaries under the operational control of Luminous.

In the following document, "Luminous" or "the Company" is used interchangeably.

The Company is committed to working with and encouraging its stakeholders to uphold the principles in this Policy and, as needed, to adopt similar policies within their operations.

Content

1. Definitions
2. Roles & Responsibilities
3. Reporting Mechanism & Complaint Procedure
4. Confidentiality & Protection Against Retaliation

Confidentiality Status

Public

Local adaptation authorization

Yes, if more restrictive.

Introduction

“We are convinced that diversity of people and an environment of inclusion generate greater engagement, performance, and innovation.”

As a multinational company, Luminous is committed to respecting and promoting the highest standards of ethics as stated in our Trust Charter and to becoming the most diverse and inclusive company in the world. Our Diversity & Inclusion ambition is to offer equal opportunities to everyone everywhere, and we want our people — no matter who they are or where in the world they live — to feel uniquely valued and safe to contribute their best. We are convinced that diversity of people and an environment of inclusion generate greater engagement, performance, and innovation.

For diversity to flourish we must create an environment of safety and belonging so that each employee can bring their authentic selves to work.

All Luminous employees are entitled to respectful treatment at the workplace and to be free from the demoralizing effects of harassment or unwelcome, offensive or improper conduct.

A respectful workplace is more than compliance with the law. It’s about a working environment free of harassment, victimization and inappropriate behavior of any kind.

No Luminous employee shall be subjected to harassment, victimization or retaliation based on - including but not limited to - race, sex, national origin, religion, political opinion, age, medical status, disability, gender, marital status, pregnancy, sexual orientation or gender identity.

It is Luminous’s policy to prohibit harassment in the workplace. Luminous has a "zero tolerance" policy on harassment.

Definitions

Harassment

Harassment is defined as any offensive, inappropriate, unwelcome or even inadvertent behaviors that has the effect of hurting, offending, or upsetting another employee, that sets up an employee to make a mistake, that humiliates or intimidates an employee (“bullying”) or that entails physical or social isolation (“silent treatment”) of an employee. It typically involves the misuse of power; considering that “power” does not always mean being in a position of authority, but can include either personal strength or power to coerce through fear or intimidation. This offensive behavior negatively affects the dignity, psychological or physical integrity of the targeted employee and results in a negative workplace. It may be related but not limited to race, sex, national origin, religion, political opinion, age, medical status, disability, gender, marital status, pregnancy, sexual orientation or gender identity. Either a repeated but also a one-off incident of serious behavior can constitute harassment if this behavior is detrimental and results in any adverse effects for the employee. The Company prohibits any conduct which contributes to an intimidating or offensive workplace and/or interferes with a person’s ability to perform their job.

Harassment can take on various forms such as:

- Threats, blackmail, coercion
- Sabotage of work
- Abusive language, verbal or written
- Abuse of authority or power

Sexual Harassment

Sexual harassment means unwelcome sexual conduct (physical, visual, verbal or written) which affects an individual's dignity and creates an intimidating, hostile or uncomfortable working environment.

Sexual harassment can take on various forms such as:

- Verbal manifestations: words, advances, propositions or requests for sexual favors.
- Written manifestations: sending any type of written communication, including emails or text messages, with unwelcome or offensive sexual requests, inquiries or advances.
- Visual manifestations: leering, making sexual gestures, displaying offensive sexually suggestive objects or pictures, cartoons or posters, subtle or explicit demands for sexual favors.
- Physical manifestations: unsolicited or unwelcomed actions including touching or assault.

Employee

'Employee' shall mean and include any person on the active payroll of the Company including managers and workers, those on deputation, contract, temporary, part time, apprentices, trainees or working as consultants.

Workplace

Luminous's anti-harassment policy defines "workplace" as anywhere where Luminous's employees are conducting business on the Company's behalf.

This includes, but is not limited to, conducting business in person on Luminous premises, on the phone, virtually, or through email or other social media and/or during after-hours events such as, but not limited to, business meetings, dinners, trainings, and during work-related travel.

Roles & Employees' role and responsibilities

Every employee is expected to treat others with respect and ensure that their own behavior does not cause offense or give rise to misunderstandings. It is every employee's responsibility to do their best to ensure a positive workplace and build inclusive teams.

Employees are encouraged to advise others of behavior that is unwelcome or offensive. Often, some behaviors are not intentional. While this does not make it acceptable, advising the offender of inappropriate behavior gives the offender the opportunity to modify or stop their offensive behavior.

An employee who believes that they have been harassed should:

- File a complaint and obtain a review of their complaint through the complaint process established in accordance with this Policy.

They will be:

- Kept informed throughout the process, subject to applicable legislation;
- Protected against retaliation.

Managers' role and responsibilities

Managers must ensure to provide a safe working environment for their team members. This should be achieved by:

- Building inclusive teams by treating everyone with respect and trust;
- Putting an end to any harassment they are aware of, whether there is a complaint or not;
- Reporting immediately to a Human Resources Representative when made aware of conduct inconsistent with this Policy;
- Ensuring their team members are not retaliated against for a prior complaint.

Failing to take corrective measures with regards to any behavior violating this Policy that managers are aware of may result in appropriate disciplinary sanctions, up to and including termination, being imposed upon themselves as well as the offender.

Witnesses' role and responsibilities

It is the responsibility of all employees to ensure they respect the right of their fellow employees to work in a workplace free of any harassment.

Any person who believes that they have witnessed a violation of this Policy, or who becomes aware of conduct that may violate this Policy, should immediately report it through the complaint mechanism of the Company.

Any employee who knew about the harassment but took no action to report it may also be subject to disciplinary sanctions, up to and including termination.

Reporting Mechanisms & Complaint Procedure

If an employee considers that they are being harassed they should seek support among the three proposed ways below. Employees may choose the one they find most suitable to their specific situation:

- Reporting to Management

If any employee believes they have been or are being subjected to conduct that violates this Policy, they should bring it to the attention of their manager.

- Reporting to HR

If the Employee does not feel comfortable raising the issue to their manager, either because of an existing or potential conflict of interest or because of the fear of retaliation, they should report the matter to their Human Resources Representative.

- Report through Trust Line

Employees can also report violations of this Policy via the Trust Charter.

The Trust Charter is Luminous's Professional Alert System designed for employees to report any violation of our Trust Charter and related policies or directives, including this one, while complying with local regulations.

<https://secure.ethicspoint.eu/domain/media/en/gui/105298/index.html>

Confidentiality & Protection Against Retaliation

Luminous strictly prohibits retaliation against anyone who, in good faith, reports violations of this Policy or participates in an investigation, even if the investigation does not ultimately prove the concerns. Dishonest, bad faith, or otherwise abusive reports (such as false personal attacks aimed at specific individuals) are prohibited and may result in disciplinary action.

Vipul Sabharwal



Digitally signed by
VIPUL SABHARWAL
Date: 2022.05.16
12:12:40 +05'30'

Digitally signed by
PANDEY ASHISH KUMAR
Date: 2022.05.14
14:22:42 +05'30'