



Policy on Prevention of Sexual Harassment DUN & BRADSTREET INDIA

Objective:

The policy on Prevention of Sexual Harassment (this “Policy”) has been formulated by *Dun and Bradstreet Information Services India Private Limited (“D&B-India”)* with respect to prevention, prohibition and redressal of sexual harassment, to have a harmonious work environment within the organization, and provide a mechanism for the resolution of complaints. The purpose of this policy is to:

- Explain what sexual harassment is
- Summarize the responsibilities and obligations of employees in preventing cases of sexual harassment
- Encourage the reporting of such behavior and cases by outlining a formal reporting mechanism
- Define a process to deal with complaints related to sexual harassment

Scope:

This policy will cover:

- All employees of Dun and Bradstreet, India as every employee shares the responsibility of making it a great place to work, free from any discrimination or harassment on sexual grounds
- All third parties including vendors, consultants, clients when they are working inside or outside the premises of Dun and Bradstreet, India
- This policy will cover cases that may occur at workplace as well as any other place like client’s or any third party’s office where the Dun and Bradstreet, India employee is engaged in company activities
- The complainant as well as the harasser may be a woman or a man. The complainant does not have to be of the opposite sex

Definition:

As per the law, Sexual harassment is defined as an unwelcomed sexually determined behavior (whether directly or by implication) as:

- Physical contact and advances
- A demand or request for sexual favors
- Sexually colored remarks; use of derogatory abusive language
- Showing pornography
- Any other unwelcome physical, verbal or non-verbal conduct of sexual nature

The above list is indicative and not exhaustive.

Sexual Harassment Complaint Committee (SHCC):

The Sexual Harassment Complaint Committee (SHCC) consists of 4 members and will be led by the Chair. The Composition of SHCC is given in [Annexure A](#) of this policy. The contact details of the SHCC are available on Workday. The composition of this committee will be reviewed annually.

Process for Registering Complaint:

As and when an employee feels that he/she has been subject to sexual harassment at workplace, before registering a Complaint he/she is advised to inform the accused that his/her behavior is unwelcome and ask him/her to stop the same. However, employees are free to register a complaint directly with the SHCC without discussing with the alleged harasser.

- The employee who is being subject to such behavior is also advised to keep a record of relevant incidents (dates, times, locations, possible witness, what happened, employee's response)
- For registering a complaint, an employee can approach any member of the SHCC or People Team and share the details in confidence
- Or alternatively the employee can prepare a written complaint in the format shown in Annexure B, which shall be mailed/ submitted to any member of the SHCC or People Team.
- In case of complaints, which SHCC deems as being outside their jurisdiction, for example, offences of a criminal nature, the law of the land will apply. SHCC will provide all the necessary assistance to the police / appropriate authorities to support the investigations



- Where an employee lodges a complaint alleging sexual harassment directly with the police, intimation regarding the same must also be sent to the HR Representative and the SHCC by the employee as soon as possible

Formal Redressal:

- In case a complaint is made to SHCC, the SHCC members will speak to the complainant and the accused either in person or over VC/telecon in order to give them an opportunity to present their case in detail and submit necessary documents and proofs.
- SHCC is authorized to nominate internal or external persons to undertake fact finding, make the necessary enquiries or meet the complainant and the accused on its behalf. SHCC may also undertake any other means they deem appropriate to arrive at the facts or get information relevant to the case. This may include personal interviews with concerned employees and their co-workers, asking for any documents or records, etc.
- Depending on the facts and documents shared by the complainant, the accused and other witnesses and the seriousness of the offence, SHCC can take either of the following decisions:
 - ✓ The complaint is out of the scope of its jurisdiction and refers the case to the police / competent authority
 - ✓ The complaint is within its scope of jurisdiction, and can take suitable action
- SHCC has to prepare a Recommendation Report about any case that is referred to them. Any such report has to be shared with the compliance committee for their information within 7 days of the last Committee meeting
- All investigations for complaints of sexual harassment should be completed within 90 days of reporting the same to SHCC

Appropriate Action:

Appropriate action could include but need not be limited to:

- A letter of warning. The same will be placed in the personal file
- Dismissal/termination from the services of the company without pay
- Any other action that SHCC may deem fit

Committee's decision will be binding on all stakeholders. SHCC will inform the respective SBU Heads of the action taken. Failure or refusal of any persons to co-operate, or to disturb or misguide SHCC during its investigations may result in appropriate action against such persons as deemed by SHCC, including termination.

Complaints made with a malicious intent:

- The complaint of sexual harassment made by any employee shall be taken up with utmost seriousness by Company, however if a false complaint has been filed knowingly and the investigation has proved that the intention of the complainant was malicious, for example, to willfully defame the alleged harasser, strict action will be initiated against the complainant by SHCC, including termination from employment without pay
- SHCC should close the issue by making a formal document stating the grounds on which the complaint was found to be invalid and malicious and should forward the same to the Appellant Committee within 7 days from closure of the case
- It is to be noted that this statement is not intended to discourage employees from coming forward with any complaints. D&B recognizes and expects that some claims may be difficult to prove or support or may not in fact be found to raise to the level of seriousness deemed necessary to constitute Sexual Harassment. These types of complaints will not be considered to be false accusations.

Confidentiality Clause:



- All complaints will be kept confidential. Anonymous complaints may be ignored
- Individuals involved in the complaint process/system must refrain from divulging details of complaint/any information gathered by them before or during or after the course of investigation and the identity of persons concerned. Any breach of confidentiality will be taken seriously and can invoke appropriate action

Harassment caused / faced by a depute (third party):

- In case the harassment is caused by a depute from vendor of Dun and Bradstreet, India post preliminary investigation, SHCC should forward the Complaint with all necessary proofs and documents to the respective vendor organization and the prevalent redressal mechanism of the vendor organization should be followed in such cases.
- In case the alleged harasser belongs to any client or third party associated with, SHCC may assist the Complainant in raising the complaint to Executive Management or any other member of the leadership team of that third party. The prevalent redressal process of the third party will be followed in such cases.
- In case complainant is an employee of any client or third party associated with Dun and Bradstreet, India and the alleged harasser is an employee of Dun and Bradstreet, India, the above mentioned redressal procedure will be applicable after the complainant submits the written complaint (Appendix B, Complaint Form) to SHCC.

Roles and Responsibilities of employees:

- All employees are expected to display appropriate workplace behavior at all times. All SBU Heads, Leaders and Reporting Managers will be responsible for implementation of this policy in their respective departments.
- In order to prevent and deter cases related to sexual harassment of women employees, please exercise the following cautionary measures:
 - ✓ Ensure safety of women working on Weekends or holidays.
 - ✓ Women employee should not sit late in the office in case she is alone in the entire department or quadrant/wing of a particular floor.

Note: There are separate compliance guidelines in the form of a Code of Conduct managed by Dun & Bradstreet's Compliance Team and any issues pertaining to any kind of non-compliance may be reported as specified under the same.

APPENDIX A – Sexual Harassment Complaint Committee (SHCC) :

The Sexual Harassment Complaint Committee (SHCC) will consist of 4 members and will be led by the Chair.

1. **Ms. Preeta Misra (Senior Director, Sales Operations) – Chair**
Email ID:- misrap@dnb.com / Phone Number:- 9819288774
2. **Ms. Pallavi Dhawan (Director – People Business Partner, India)**
Email ID:- dhawanp@dnb.com / Phone Number:- 9167002285
3. **Mr. Abhishek Parab (Principal Auditor)**
Email ID:- ParabA@DNB.com / Phone Number:- 9769648899
4. **Dr. Anagha Sarpotdar – External Consultant on Sexual Harassment at Workplace**
Email ID:- anagha.sarpotdar@gmail.com / Phone Number:- 9930905927



APPENDIX B – Dun and Bradstreet, India Sexual Harassment Complaint Form

| | |
|---|-----------------------|
| Name & Details of Complainant | |
| Complaint made against (Name & Details of the alleged harasser) | |
| Where did the incident (s) occur? | |
| When did the incident(s) occur? | Date _____ Time _____ |
| Was or is anyone else present at the time the incident(s) occurred? | |
| Who was or is involved in the incident(s)? | |
| What happened or is happening? (nature of complaint) | |

| | | | |
|---------------------------|--|---------------------------------------|--|
| Complainant Name | | SHCC/People Team Member Name | |
| Complainant Emp ID | | SHCC/People Team Member Emp ID | |
| Signature | | Signature | |
| Complaint Date | | Report Date | |