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OBJECTIVE

1. Objective

DSSL & DSGS is committed to providing a work environment free from sexual discrimination and harassment thereby promoting gender sensitive safe workplace. In keeping with this commitment, the Company has formulated this Prevention of Harassment at Workplace as per the mandate of the **Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and as per the policy of the Company**. However, provisions of the Policy and grievance redressal mechanism are available to all employees of DSSL and DSGS irrespective of gender.

GLOSSARY

- Employee-Regular – Permanent employees on the direct payroll of the Company
- Employee-Temporary – Interns, Apprentices, Direct Contractors
- Non-Employees – Third-Party Contractors
- DSSL – Dassault Systemes Solutions Lab
- DSGS – Dassault Systemes Global Services

WHO: TARGET AUDIENCE

This policy is applicable to all the employees falling under the category of Employee-Regular, Employee-Temporary and Non-Employees, across all centres in India.

WHAT

The Company Strictly Prohibits

1. Harassment of any Employee or any person who has interactions with the Company in the course of its business by another Employee OR Harassment of any Employee by any person that has interactions with the Company in the course of its business OR Prohibited conduct by any person / employee at Workplace; and

2. Any form of retaliation directed against any person who either complains about Harassment or who participates in any investigation concerning Harassment.

DEFINITIONS

2. Definitions:

- ***Act*** - Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013.
- ***Company*** - means DSSL & DSGS, its subsidiaries and branches worldwide.
- ***Complainant*** - means an aggrieved person who is exposed to Prohibited Conduct and Harassment (defined below) or a person registering a complaint on behalf of aggrieved person where the person is unable to make a complaint on account of physical or mental incapacity or for any other reason including the aggrieved person's death.
- ***Respondent*** - means a person against whom a complaint is made under this Policy.
- ***Employee*** - means any person employed (whether part-time or full time, permanent or temporary or adhoc or daily wage, for remuneration or not) directly by the Company or through contractors on express or implied terms of employment and shall include person working on a voluntary basis or otherwise, probationer, trainee, apprentice or called by any other such name.
- ***Employer*** – A person under whose control, supervision or management the workplace functions. Employer shall include Principal Officer / Chief Executive Officer of Company.
- ***Grievance Redressal Mechanism*** - means the mechanism prescribed for dealing with complaints under this Policy.
- ***Harassment*** - includes any unwelcome acts or behavior (whether directly or by implication) namely physical contact and advances or request for sexual favors or making sexually colored remarks or showing pornography or any other unwelcome physical, verbal or non-verbal conduct or other behavior, of a sexual nature, towards any person that:
  - has the purpose or effect of humiliating the aggrieved person of such conduct or behavior; or
  - has the purpose or effect of creating an intimidating, hostile or offensive work environment; or
  - has the purpose or effect of interfering with the aggrieved person's work performance; or
  - affects the aggrieved person's employment opportunities or compensation.
  - Further any act constitutes harassment shall be decided by the INTERNAL COMMITTEE (IC) after considering all circumstances with reasonable standards of jurisprudence
- ***Prohibited Conduct*** – means Harassment of any person at company's Workplace and includes any form of retaliation directed against any person who either complaints about Harassment or who participates in any investigation concerning Harassment.
- ***Rules*** – Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Rules, 2013.

- ***Workplace*** - means and includes all offices, branches, and establishments of the Company, whether located within India or overseas.
  It extends to any "extended workplace," being any place or location visited by an Employee arising out of or during the course of employment.
  The Act envisages a broader interpretation of workplace including but not limited to:
    - Any client location, project site, conference venue, or field location;
    - Any venue utilized for office retreats, offsite events, training programs, or corporate-sponsored social gatherings;
    - Airports, hotels, guest houses, or any mode of transportation provided, arranged, or reimbursed by the Company for undertaking work-related travel;
    - The digital workplace, including but not limited to virtual meeting rooms, official communication channels, email platforms, and work-related digital applications; and
    - Any remote working setup, including the private residence of the aggrieved person, where work-related duties are discharged or where virtual interactions occur during the course of employment.

  Sexual harassment on social media platforms falls within the scope of this policy if it arises out of a working relationship or impacts the professional environment.
- ***Internal Committee (IC)*** – means the Investigation and Redressal committee established as per S.4 of the Act.
  – The INTERNAL COMMITTEE (IC) must be headed by a woman who is in a position to take decisions
  – 50% of the members must be women
  – An external member who is either representative of an NGO, social worker or lawyer with 3 years and more experience in the area of women's rights
  – As far as possible the INTERNAL COMMITTEE (IC) must have odd number of members to avoid tie up situations

  The aforementioned Internal Committee shall accept and address all sexual harassment related complaints made by a Complainant, irrespective of gender.

Meetings/Role and Responsibility of INTERNAL COMMITTEE (IC)

- The INTERNAL COMMITTEE (IC) shall meet at least every quarter.
- The INTERNAL COMMITTEE (IC) members must plan the preventive measures to avoid incidences of sexual harassment.
- The INTERNAL COMMITTEE (IC) must assist and encourage employees, especially aggrieved person to speak against acts of sexual harassment.
- The INTERNAL COMMITTEE (IC) members must be accessible and prioritize the work of INTERNAL COMMITTEE (IC) especially when there is a complaint of sexual harassment.

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JURISDICTION and CROSS-ORGANIZATIONAL FRAMEWORK

3. Jurisdiction and Cross-Organizational Framework

The jurisdiction for receiving, investigating, and redressing complaints of sexual harassment varies based on the employment relationship and organizational status of the parties involved. The matrix below defines the three operational frameworks for handling complaints:

Case / Scenario	Jurisdictional Authority & Inquiry Process	Cross-Organizational Compliance & Action
Case 1: Internal Workplace Incidents (Both parties belong to DSSL/DSGS)	The Internal Committee (IC) of DSSL/DSGS holds full and exclusive jurisdiction over all incidents occurring within the defined "Workplace".	The IC will conduct the end-to-end inquiry, formulate findings, and directly recommend disciplinary actions to the employer for enforcement or any other investigation and action applicable as per this policy.
Case 2: Cross-Organizational / Third-Party Incidents (Complainant or Respondent belong to different organizations, other than DSSL/DSGS, e.g., clients, vendors, or contractors)	The Complainant's organization's IC holds the jurisdiction to conduct the fact-finding inquiry. In alignment with Supreme Court directives, this ensures the aggrieved individual has immediate "access to justice" within their own workplace ecosystem.	The Respondent's organization is legally required to cooperate fully with the inquiry. Upon completion of investigation by the Complainant's organization's IC, the findings will be shared with the Respondent's organization's IC and employer, who shall determine the recommendations and execute appropriate disciplinary action.
Case 3: Complaints Involving the Employer (The Respondent is the "Employer" as defined in this policy document)	Pursuant to Section 7 of the POSH Act, 2013, the internal IC stands recused due to conflict of interest. The Complainant has the right to directly approach the statutory Local Committee (LC).	The organization and its management are legally barred from interfering with the external inquiry. The organization must fully cooperate, provide necessary facilities to the LC, and enforce any interim relief or final penalties directed by the LC.

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GUIDELINES

4. Guidelines:

The following examples illustrate what can be considered as harassment. Such examples do not limit the scope of the definition of Harassment and the Company shall be the sole authority in determining whether any person has engaged in Prohibited Conduct.

1. Subjecting a person to an unwelcome act of physical intimacy, like grabbing, brushing or touching.
2. Making an unwelcome demand or request (whether directly or by implication) for sexual favors from a person or making the grant of sexual favors a condition for offering employment/retention in employment/payment of wages/increment/promotion.
3. Making unwelcome remarks with sexual connotations, like sexually explicit compliments/cracking jokes with sexual connotations/making sexist remarks.
4. Showing a person any sexually explicit material in the form of pictures/cartoons/pinups/calendars/screen savers/any offensive written material/pornographic e-mails.
5. Engaging in any other unwelcome conduct of a sexual nature, which could be verbal, or even non-verbal, like staring, derogatory gestures or facial expressions of a sexual nature to make the other person uncomfortable.
6. Making offensive gestures or sounds with sexual connotations.
7. Making unwelcome inquiries into the private relationships of a person.
8. Persistently asking a person out.
9. Joking about sexual conduct in an attempt to humiliate or embarrass another person.
10. Implied or explicit promise of preferential treatment.
11. Implied or explicit threat of detrimental treatment.
12. Implied or explicit threat about present or future employment status.
13. Interference with work or creating an intimidating or offensive or hostile work environment.
14. Humiliating treatment likely to affect health or safety.

ROLES AND RESPONSIBILITIES

5. Responsibility of Employer

It is the duty of the employer to provide a safe working environment at workplace. There must be display boards at conspicuous places in the workplace stating what is sexual harassment and the names and contact details of the INTERNAL COMMITTEE (IC) members. Awareness programs and trainings must be organized. The employer must provide the necessary budget and infrastructure for the proper functioning of the INTERNAL COMMITTEE (IC).If the employer does not follow the mandate of the law, there are serious consequences under the law.
The employer has the responsibility of implementing the recommendations of the IC as per the conciliation terms /inquiry conclusions. In the course of implementation, the employer may involve HR Team as deemed appropriate.

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WHEN

6. Grievance Redressal

1. Any aggrieved person having working relation with the organization having experienced any Prohibited Conduct is advised to report such conduct only to any member of INTERNAL COMMITTEE (IC) either in person or in writing over email to IN.3DSIndiaLab.IC@3ds.com (in case of DSSL) and IN.DSGS.IC@3ds.com (in case of DSGS). In case the aggrieved person has already approached the HR Team, the HR Team Member is advised to immediately inform the IC & also direct the aggrieved person to contact the IC via email or in person as deemed appropriate.
2. The complaint will be dealt with in accordance with the procedure laid down in the Grievance Redressal Mechanism described below.

HOW: GRIEVANCE REDRESSAL MECHANISM

A minimum of three members of the INTERNAL COMMITTEE (IC) including Presiding Officer/ Chairperson and External member shall be present during an inquiry

7. COMPLAINT, INVESTIGATION & ACTION

a) Filing of a Complaint

1. A Complainant of Prohibited Conduct should report the incident only to the INTERNAL COMMITTEE (IC) either in person handing over signed physical copies of complaint or in writing over email to IN.3DSIndiaLab.IC@3ds.com (in case of DSSL) and IN.DSGS.IC@3ds.com (in case of DSGS), within **three months** from the date of the incident, and in case of a series of incidents, within three months from the date of last incident. Email or in writing is preferred since it records the complaint. A person who is not able to make the complaint in writing can seek assistance of the INTERNAL COMMITTEE (IC) members to write the complaint.
2. Six copies of the complaint should be submitted along with the supporting documents and names and addresses of the witnesses.
3. A person may register a complaint on behalf of aggrieved person where aggrieved person is unable to make a complaint on account of physical or mental incapacity or for any other reason. In the event of death of the aggrieved person his/her legal heirs can register the complaint in relation to the harassment. In such cases, an authority / consent letter from the aggrieved person, relevant document establishing inheritance or connection with deceased complainant, authorizing the complainant to make the complaint on behalf of the Complainant, should also be made available to the INTERNAL COMMITTEE (IC).
4. The INTERNAL COMMITTEE (IC) may extend the time limit for filing the complaint for a period not exceeding three months for reasons to be recorded in writing, if it is satisfied that the circumstances were such which

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prevented the aggrieved person from filing a complaint within the three months' period as referred in point 1 above.

5. A notice is sent to the Respondent within 7 days from receiving the complaint along with a copy of the complaint.
6. The Respondent is required to reply within 10 days of receiving it.

b) Conciliation

7. The INTERNAL COMMITTEE (IC) may, before initiating an inquiry into the complaint and at the written request of the aggrieved person take steps to settle the matter through conciliation.

a. There cannot be monetary settlement i.e. settlement could be in the form of an apology letter from the respondent, mutually consented transfer of Complainant / Respondent, etc.
b. If settlement has been arrived at, INTERNAL COMMITTEE (IC) shall record the same and forward the same to the Employer to take action as specified in the recommendation. Such conciliation agreement stating details of the settlement shall be signed by the Complainant and the Respondent and all members of the IC.
c. INTERNAL COMMITTEE (IC) shall provide copies of the settlement to the Complainant and Respondent.
d. No further inquiry shall be conducted by the INTERNAL COMMITTEE (IC).
e. Conciliation happens on the premise that there is a prima facie case of sexual harassment.
f. After conclusion of conciliation formalities Complainant shall not have an option to prefer an appeal as provided under the Act.

c) Inquiry

1. If aggrieved person does not request for settlement or if no settlement is reached under point 6 above or if any term or condition of the settlement has not been complied with by the Respondent, INTERNAL COMMITTEE (IC) will proceed with the inquiry.
2. The investigation will involve the following:
    a. Getting all relevant information from the Complainant, wherever possible, signed copies of the documents substantiating the complaint.
    b. Informing the Respondent of the details of the complaint within **7 working days**. The Respondent shall file his / her reply to the Complaint along with the list of documents, and names and addresses of witnesses within a period of **10 working days** from the date of receipt of the complaint.
    c. Giving both parties an opportunity of being heard and examining such parties on oath.
    d. Requiring production of documents
    e. Interviewing witnesses, if any.
    f. Fair and objective investigation based on principles of natural justice.
    g. Giving both parties copy of the findings enabling them to make representation against findings of INTERNAL COMMITTEE (IC), wherever required.
    h. Documentation of all details of the complaint and investigation including all evidence shared during enquiry and recommendations made.

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3. The INTERNAL COMMITTEE (IC) is required to maintain utmost Confidentiality of the Complainant, the witnesses and Respondent to extent possible.
4. During pendency of inquiry on written request of the Complainant, the INTERNAL COMMITTEE (IC) may recommend to Employer to grant the aggrieved person immediate/interim relief like:
   a. Transfer the aggrieved person or the Respondent to any other workplace; or
   b. Restrain the Respondent from reporting on the work performance of the aggrieved person and assign the same to another reporting manager; or
   c. Grant additional special leave to the aggrieved person up to a period of 3 months; or
   d. Restraining the Respondent from contacting the complainant; or
   e. Grant any other relief to the aggrieved person where the circumstances so require
5. The INTERNAL COMMITTEE (IC) is empowered to take all actions that the independent enquiry committee considers reasonable and necessary to fulfill its responsibilities under this policy.
6. The INTERNAL COMMITTEE (IC) may terminate the inquiry proceedings or give an ex-parte decision on the complaint by giving a written notice of 15 days to the party concerned, if the Complainant or the Respondent fails, without sufficient cause, to attend three consequent inquiry hearings of the INTERNAL COMMITTEE (IC)
7. The INTERNAL COMMITTEE (IC) shall complete the inquiry within **90 days** and submit its report to the Employer with its findings and make recommendations on the action to be taken (if any) within **10 days** from the date of completion of inquiry.
8. The **Employer** shall take action required to be taken (if any) on the INTERNAL COMMITTEE (IC)'s recommendations within **60 days** and send the report of such implementation to the INTERNAL COMMITTEE (IC).
9. The INTERNAL COMMITTEE (IC) shall communicate to the Complainant and Respondent, the findings of its investigation and action recommended (if any)

8. Disciplinary Action

1. If the INTERNAL COMMITTEE (IC) concludes that the allegations against the Respondent have not been proved, it shall recommend that no action is required to be taken in the matter
2. If the INTERNAL COMMITTEE (IC) concludes that the allegations against the Respondent who is an Employee (other than an employee of a third party) has been proved, the Employer initiate disciplinary action including a demand of written apology, warning, reprimand or censure, deduction of a certain sum from the salary to be paid to aggrieved person, withholding variable or performance pay-outs, withholding of promotion, withholding of pay rise or increments, termination of employment or any other action as deemed appropriate and recommended by the INTERNAL COMMITTEE (IC)
3. In case the Respondent fails to pay the sum to the aggrieved person, the INTERNAL COMMITTEE (IC) may forward the order for recovery of the sum as an arrear of land revenue to the concerned district officer notified by the government
4. In all other cases where the Respondent is not in the service of the Employer, if the INTERNAL COMMITTEE (IC) finds the Respondent guilty of engaging in Prohibited Conduct, the Company shall report the same to

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the Respondent's employer with a demand that such Respondent not be entrusted to deal with the Company any further

5. The Company is entitled to initiate further legal action if the Prohibited Conduct also constitutes a criminal offence under any applicable law as stated below

9. Additional Action

If the Prohibited Conduct involves physical or sexual assault or other acts which amount to criminal offences under the Indian Penal Code or any other law for the time being in force, in addition to dealing with the complaint under this Policy, the Company will assist the Complainant in filing a complaint or cause to initiate action with the appropriate authorities.

10. Malicious Complaints

1. If the INTERNAL COMMITTEE (IC) concludes that the allegations against the Respondent is malicious or was made knowing it to be false or Complainant has produced any forged or misleading document, INTERNAL COMMITTEE (IC) may recommend to take disciplinary action against the Complainant, including but not restricted to deduction of certain sum from salary to be paid to the Respondent, withholding variable or performance pay-outs, withholding of promotion, withholding of pay rise or increments, temporary or permanent transfer from project/location, temporary suspension or termination of employment as recommended by INTERNAL COMMITTEE (IC). An inquiry must be made in order to establish malicious intent. Also, mere inability to substantiate a Complaint will not attract any action
2. If the INTERNAL COMMITTEE (IC) concludes that during the inquiry any witness has given false evidence or has produced any forged or misleading document, INTERNAL COMMITTEE (IC) may recommend to the Employer to take action against the witness for misconduct in accordance with the Company's HR manual.
3. Lack of evidence substantiating the Complaint is not a false complaint. The onus of proving that a complaint is false shall be on such person alleging that the complaint is false.

11. Escalation Mechanism

If Complainant doesn't receive acknowledgement of the complaint from the INTERNAL COMMITTEE (IC) within **2 working days**, or if no immediate relief is provided by INTERNAL COMMITTEE (IC) where required, then Complainant may escalate the matter to **the Employer**.

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12. Confidentiality

1. Company will not disclose any information about a complaint to anyone other than Complainant or Respondent, except as necessary to investigate the complaint or to take disciplinary action or as required by the Company's internal compliance mechanism, or as required by law.
2. All Employees have a responsibility to cooperate in the investigation of a harassment complaint.
3. Anyone who gives evidence in an investigation, or who is otherwise involved in the process, must keep this information confidential, except as is necessary to deal effectively with the complaint. These are serious issues, and people's privacy must be respected
4. Even once a complaint is resolved, confidentiality and respect are important and must be adhered to.
5. Information about justice secured to the aggrieved person may be disseminated without disclosing the identity of the parties

13. Appeal

Any person aggrieved from the recommendations made by the INTERNAL COMMITTEE (IC) or non-implementation of the recommendations made by the INTERNAL COMMITTEE (IC) may file an appeal to the appellate authority notified under clause (a) of the Industrial Employment (Standing Orders) Act, 1946 with 90 days of the recommendations. This recourse is restricted to women Employees only pursuant to provisions of the Act which permit the option of Appeal to be available to women complainants only. Once the complaint is resolved through the process of Conciliation the complainant shall not have option of aforesaid right to seek appeal under the Act.

14. Closure

A copy is provided to the employer and to the employee and is also maintained in employee records (for both the complainant and the respondent).

15. Implementation of Internal Committee (IC) Recommendations

The Final Report issued by the Internal Committee (IC) shall include specific recommendations based on its findings. All parties involved are expected to adhere to these recommendations as follows:

- **Compliance by Parties:** Where the IC recommends specific actions to be taken by the **Complainant** or the **Respondent**, the respective party shall strictly comply with such directions within the timeline stipulated in the report.
- **Employer's Obligations and HR Execution:** In instances where the IC recommends actions to be taken by the **Employer**, the Human Resources (HR) Department shall serve as the primary executing body.

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- **Stakeholder Coordination:** The HR Department is responsible for communicating the IC's directives to the relevant stakeholders to ensure the seamless implementation of the recommended actions.
- **Monitoring and Reporting:** To ensure transparency and closure, the HR Department shall keep the IC apprised of the progress of these actions. This includes providing formal updates or copying the IC on relevant communications (e.g., via email or internal documentation) once the recommendations have been shared with stakeholders for execution.

16. Annual Report to District Officer (DO):

Annual report of every calendar year must be submitted to the District Officer as per S. 21 and Rule 14 of the Act and shall reflect complaints received addressed in relation to women complainants only.

GRIEVANCE REPORTING

To report any grievances under this policy, you may write to the following email addresses:

DSGS: IN.DSGS.IC@3ds.com

DSSL: IN.3DSIndiaLab.IC@3ds.com

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