



Prevention of Sexual Harassment Policy for Visa India

Owner: Seng Hong Wee (AP Regional Ethics and Compliance Leader)

Renewal Date: 10/September/2024

1. Purpose

Visa Inc. and its subsidiaries are committed to the establishment of a program that provides a workplace that is respectful, safe, and free from unlawful discrimination and harassment. To that end, Visa Inc. has a [Global Prevention of Harassment and Discrimination Policy \(“Global PHDP”\)](#) applicable to all Visa group entities globally.

To meet the specific requirements for Visa group entities in India (including but not limited to Visa Consolidated Support Services (India) Private Limited) (hereinafter referred to as “**Visa India**” or the “**Company**”), Visa India has created the Prevention of Sexual Harassment Policy (“**Policy**”) in India.

2. Scope

The Policy together with Appendix 1 (drafted in accordance with the provisions of the Sexual Harassment of Women at Workplace [Prevention, Prohibition and Redressal] Act, 2013 [SH Act]), to this Policy provides a framework to specifically deal with acts of Sexual Harassment raised by woman only, at the workplace and applies to all Visa India directors, officers, employees, contractors, trainees, apprentices, vendors, consultants, clients, visitors and contingent workers (“**Visa Staff**”).

This Policy covers conduct in the workplace and at work related social events, office parties, off-sites, client events as well as any conduct that has an impact on the work environment, including office transportation and online or other modes of communication used by Visa Staff.

This Policy shall be a subset of Global PHDP and shall apply to specific incidents and compliance requirements covered under the SH Act. For all other cases, provisions of your employment contract, Global PHDP and local employee handbook shall apply.

Please review the local Employee handbook for additional details applicable to India based personnel.

3. Policy Statement

Visa India is firmly committed to providing equal opportunity in all aspects of employment and will not tolerate any form of Sexual Harassment. We expect you to share our commitment to a workplace free of Sexual Harassment. Violations of this Policy may lead to remedial and/or disciplinary action commensurate with the circumstances and applicable law, up to and potentially including termination of employment or any other relationship the violator has with Visa.

4. Ownership

AP Regional Ethics and Compliance Leader is the Policy Owner and will appropriately delegate responsibility for the management and oversight of this Policy.

5. Training and Attestation

The People Team, and Ethics and Compliance shall ensure that information and/or training is provided, as appropriate, to best comply with both Global PHDP and this Policy.

6. Reporting

If you, in good faith, believe that you have experienced any type of Sexual Harassment that you believe may violate this Policy, you may report it in writing to your manager, the People Team (formerly Human Resources), the Business Conduct Office (businessconduct@visa.com) or Ethics & Compliance.

For additional details on how to report concerns as per the Policy, please review Appendix 1 section on 'Sexual Harassment Complaint Procedure.'

7. Investigations

The Company will promptly and appropriately investigate all Sexual Harassment related complaints received in writing and will not tolerate any kind of retaliation for reports or complaints made in good faith, or for good-faith participation in an investigation of a complaint of harassment.

For additional details, please review Appendix 1.

8. Policy Review

The Policy Owner is responsible for reviewing the Policy at least every two years to confirm that it remains relevant and is effective in meeting the stated business objectives, and recommending updates as needed. Exceptions to this Policy are not permitted.

Appendix 1 of this Policy spells out **Rules for Reporting and Addressing Complaints of Sexual Harassment**.

Appendix 1

Rules for Reporting and Addressing Complaints of Sexual Harassment

These rules apply to any allegations of Sexual Harassment made by a female Visa Staff against a Visa Staff, if the conduct occurred on the premises of Visa in India, or during the course of the Visa Staff's work for Visa India across its offices or work locations or during travel for work purposes.

Definition of Sexual Harassment

'Sexual Harassment' may be one or a series of incidents involving unsolicited and unwelcome sexual advances, requests for sexual favours, or any other verbal or physical conduct of sexual nature (whether directly or by implication).

Sexual Harassment at the workplace includes:

1. Physical contact and advances; or
2. A demand or request for sexual favours; or
3. Making sexually coloured remarks; or
4. Showing pornography; or
5. Any other unwelcome physical, verbal, or non-verbal conduct of sexual nature

The following circumstances, among other circumstances, if it occurs or is present in relation to or connected with any act or behavior of Sexual Harassment may amount to Sexual Harassment:

1. Implied or explicit promise of preferential treatment in employment; or
2. Implied or explicit threat of detrimental treatment in employment; or
3. Implied or explicit threat about present or future employment status; or
4. Interference with work or creating intimidating or offensive or hostile working environment; or
5. Humiliating treatment likely to affect health or safety.

Sexual Harassment can happen between members of the same or opposite sex and can be communicated visually, verbally, or physically.

Examples of Sexual Harassment

Harassing conduct may take many forms, but the most common forms include:

Verbal Harassment can include:

- Jokes, epithets, slurs and unwelcome remarks about an individual's body, dress, clothing, color, physical appearance, or talents, that are sexual in nature.
- Derogatory comments, such as references to women as "honey," "doll," or "sweetheart."
- Questions about a person's sexual practices
- Remarks that are sexual in nature

Physical Harassment can include:

- Impeding or blocking movement
- Sexual assault, unwelcome physical contact or touching.

- Staring at a person's body

Visual Harassment can include:

- Offensive or obscene photographs including pornography, calendars, posters, cards, cartoons, drawings, and gestures.
- Sexual displays, suggestive or lewd objects Unwelcome letters or notes with sexual content.
- Any sexually graphic material.

Sexual Harassment Complaint Procedure

Visa India has constituted a committee for redressal of Sexual Harassment complaints and for ensuring time bound treatment of such complaints – the **Internal Committee (IC)** for each office in India. Please note that all complaints will be routed to the IC. The IC is responsible for investigating every formal written complaint of Sexual Harassment and advising Visa India on the actions to be taken against the respondent. The names and contact details of the members of the IC for the Bangalore and Mumbai office are set out below, which may be amended from time to time by posting a notice at the respective office. Visa India shall have the right and absolute discretion to remove or replace any member of the IC, if Visa India believes this is necessary or appropriate.

The members of the IC at Visa India are:

Mumbai:

Sl. No.	Emp ID	Name of the Member	Gender	Job Title ¹	Email ID	Contact Number	Role in the IC
1	501293	Ishan Banerjee	M	Sr. Director	shpc@visa.com	022 5097 2886	Member
2	507744	Kavitha Murali	F	Sr. Director	shpc@visa.com	022 5097 2886	Member
3	NA	Devika Singh	F	External Member	devika.singh@cohereconsultants.com	91 9818960361	Member
4	513725	Rachita Marwaha	F	Sr. Director	shpc@visa.com	022 5097 2886	Presiding Officer/Member
5	509733	Sujatha Kumar	F	Sr. Director	shpc@visa.com	022 5097 2886	Presiding Officer/Member

¹ Titles are current as of the date of the policy.

Bangalore:

Sl. No.	Emp ID	Name of the Member	Gender	Job Title ¹	Email ID	Contact Number	Role in the IC
1	522698	Ashwini BV	F	Employee Relations (ER) Manager	shpc@visa.com	022 5097 2886	Member
2	502383	Deepshikha Datta	F	Sr. Director	shpc@visa.com	022 5097 2886	Presiding Officer/Member
3	521649	Dhanya Nellikkappillil	F	Director (Ethics and Compliance)	shpc@visa.com	022 5097 2886	Member
4	13655	Hemanth Thota	M	Vice President	shpc@visa.com	022 5097 2886	Member
5	504576	Mandar Amdekar	M	Vice President	shpc@visa.com	022 5097 2886	Member
6	507091	Mrudul Uchil	F	Vice President	shpc@visa.com	022 5097 2886	Presiding Officer/Member
7	507008	Niveditha Polepalli	F	Director/ People Business Partner (PBP)	shpc@visa.com	022 5097 2886	Member
8	26495	Pavana Prasad	F	Sr. Director	shpc@visa.com	022 5097 2886	Presiding Officer/Member
9	NA	Devika Singh	F	External Member	devika.singh@cohereconsultants.com	91 9818960361	Member
10	29512	Rahul Singhal	M	Sr. Director	shpc@visa.com	022 5097 2886	Member
11	518640	Sowmya Kubendran	F	Sr. Director	shpc@visa.com	022 5097 2886	Member
12	500569	Subu Iyer	M	Sr. Director	shpc@visa.com	022 5097 2886	Member
13	28849	Bhavna Kumar	F	Vice President	shpc@visa.com	022 5097 2886	Member

Visa India is committed to providing a supportive environment to resolve concerns of Sexual Harassment as under:

1. Complaints

- a) Any woman, who is a victim of Sexual Harassment at the workplace, may make a formal complaint by writing to ***SHPC@visa.com*** which is accessible to all members of the IC. You may also contact the Presiding Officer or any member of the IC individually (contact details set out in this Policy). “Presiding

Officer” is a member nominated under the Internal Complaints Committee who shall be a woman employed at a senior level at workplace from amongst the employees. In certain special circumstances, where the victim is unable to make the complaint, the IC may allow an authorized person to make the complaint in accordance with applicable law. The complaint must be in writing and can be in the form of a letter or an email. The complainant is required to disclose his/her name and contact details, and where the complainant is an Employee, the department and division the Employee is working in, to enable the IC to contact the complainant and take the matter forward. All supporting documents, evidence and the names and address of witnesses must also be submitted along with the complaint.

- b) The complaint should be made within three months from the date of occurrence of the alleged incident and in case of series of incidents, within a period of three months from the date of the last incident. The IC may, at its sole discretion, extend this time limit by up to three more months if it is satisfied that the circumstances were such which prevented the complainant from filing of the complaint within the period of three months.

2. Processing the Complaint

- a) The IC will normally hold a meeting with the complainant, within three working days of the receipt of the complaint or within such time as it may deem reasonable. At this meeting, the IC shall hear the complainant and record her allegations and encourage her to submit any corroborative material with a documentary proof, oral or written material etc. to substantiate the complaint.
- b) The IC shall normally forward a copy of complaint to the respondent, within seven working days of receipt of the complaint, or within such time as it may deem reasonable and give him/her an opportunity to submit a written explanation.
- c) The respondent shall file his/her reply to the complaint along with his/her list of documents, names and addresses of witnesses within a period of ten working days from the date of receipt of the complaint from the IC or such other period that the IC may specify.

3. Further action on the complaint

(a) Conciliation

- (i) The IC may, before initiating an inquiry and at the request of the complainant, take steps to initiate conciliation of the matter between the complainant and the respondent, provided that no monetary settlement shall be made a basis of conciliation.
- (ii) Where a settlement has been arrived at under sub-clause (i) of this clause 3(a), the IC shall record the settlement so arrived at, and forward the same to Visa India to take action as specified in the recommendation.
- (iii) Where a settlement is arrived at, no further inquiry shall be conducted by the IC.

(b) Inquiry into the Complaint

- (i) Where the complainant informs the IC that any term or condition of the settlement arrived at as part of the conciliatory proceedings has not been complied with by the respondent, or if the complainant does not request for conciliation, or if the conciliation process fails, and where the respondent is an Employee, the IC would proceed to make an inquiry into the complaint in accordance with the provisions of this Policy.
- (ii) Quorum for the inquiry proceedings shall be four members of the IC including the Presiding Officer.
- (iii) While conducting the inquiry, the IC shall call upon such witnesses as it may deem appropriate and provide a reasonable opportunity of being heard to both the complainant and the respondent.

- (iv) Throughout the enquiry process, principles of natural justice, confidentiality and cross examination will be followed.
- (v) On completion of the inquiry, the IC will prepare a report of its findings and recommendation for action to be taken by Visa.

4. Interim relief

During the pendency of the inquiry, on a written request being made by the complainant, the IC may recommend to Visa India to limit or separate the complainant from the respondent by these or other alternative methods:

- a) transfer the complainant to another department/division as deemed appropriate, or
- b) transfer the respondent to another department/division in the same location or another location as deemed appropriate, or
- c) grant leave to the complainant up to a period of three months, or
- d) restrain the respondent from reporting on the work performance of the complainant or writing the complainant's appraisal/ confidential report(s). The IC may also recommend to Visa India to suspend the respondent [with full pay] during the pendency of the inquiry if the circumstances so merit.

5. IC's Recommendation and Action by Visa India

- a) In the event the claims against the respondent are substantiated for Sexual Harassment, depending upon the gravity of the offence and without prejudice to any legal right(s), the IC may make any of the following recommendations of disciplinary action to be taken against the respondent:
 - (i) Direct the respondent to undergo training or counselling to address any specific issues.
 - (ii) Direct the respondent to provide a written apology to the complainant clearly indicating that such behaviour will not be repeated and that no retaliatory steps will be taken by him/her or others on his/her behalf against the complainant.
 - (iii) Transfer the respondent.
 - (iv) Give a verbal or written warning which will also be noted in the respondent's record.
 - (v) Withhold increment or bonus (whether in full or part).
 - (vi) Withhold promotion.
 - (vii) Direct termination or suspension of employment of the respondent.
 - (viii) Any other recommendations as it may deem fit.
- b) The IC may also recommend to Visa India to deduct a compensatory sum from the salary of the respondent and pay it to the complainant or the respondent may be directed to pay the compensatory amount to the complainant.
- c) In the event the IC concludes that the respondent is not guilty, Visa India shall not take any further action.
- d) If the complainant desires to take criminal action against the respondent, there shall be no objection by the IC and Visa. In such an event, Visa India will attempt to provide all reasonable assistance to the complainant. Visa India may also choose to take criminal action against the respondent.

6. Punishment for false or malicious complaint and false evidence

Where the IC arrives at a conclusion that the allegation against the respondent is malicious or the complainant has made the complaint knowing it to be false or the complainant has produced any forged or misleading document, it may recommend to Visa India to act against the complainant. The IC may also recommend to Visa India to take appropriate disciplinary action when it arrives at a conclusion that any witness has given false evidence or produced any forged or misleading document. These recommendations to be made by the IC will be similar to the recommendations of disciplinary action to be taken against the respondent if he/she is found guilty of Sexual Harassment, as discussed in this Policy.

Confidentiality

Visa's aim is to deal with complaints sensitively and with due respect for the privacy of any individual involved. In addition to existing confidentiality obligations, you must treat as confidential any information communicated to you in connection with any matter of harassment. Accordingly, you shall not make electronic recordings of any meetings or hearings conducted under this Policy without the consent of all parties in attendance. The act of recording any meetings or hearings without the consent of all other parties will itself be considered a violation of this Policy.

Visa India understands that it is difficult for the complainant to come forward with a complaint of harassment and recognizes the complainant's interest in keeping the matter confidential. To protect the interests of the complainant, the respondent, witnesses, and others who may assist with the inquiry into a complaint of harassment, including Sexual Harassment, confidentiality will be maintained throughout any investigatory process to the extent practicable and appropriate under the circumstances.

The IC, Visa, the complainant, the respondent, and the witnesses would be bound to keep information relating to the inquiry process confidential. All records of complaints, including contents of meetings, results of investigations and other relevant material will be kept confidential by Visa, except where disclosure is required under disciplinary or other remedial processes or as required by law.

The complainant, respondent, witnesses, and members of the IC who are Employees of Visa India who breach the confidentiality of the inquiry process would be liable for disciplinary action up to and including termination.

Your Responsibility

All Employees and managers are responsible for keeping the work environment free of unlawful harassment.

An act of sexual harassment, by itself, may violate this Policy even though no employment opportunity is denied or no actual loss of pay, or benefits occurred.