

**IPE GLOBAL LIMITED, NEW DELHI**

**ANTI-BULLYING POLICY**

**A. General**

IPE Global Limited (IPE Global) (hereinafter referred to as “the Company”) has a zero-tolerance approach towards workplace bullying. The company values a safe and inclusive work environment for all staff and expects that all staff members treat others with dignity and respect. This is reinforced in IPE Global’s Code of Conduct which are embedded within the company.

**B. Purpose**

The purpose of this Policy is to promote an environment which values diversity and is free from Bullying, where all staff members are treated with dignity, courtesy and respect.

This Policy also aims to implement procedures and awareness raising strategies to ensure that all staff members know their roles and responsibilities in order to provide a safe and inclusive work environment.

**C. Scope**

This Policy is applicable to IPE Global Limited, India including its subsidiaries in India, namely, IPE Global Centre for Knowledge and Development (IPE CKD) and Ajooni Impact Investment Advisors Private Limited.

This Policy is applicable to all the staff members (including contractual and support staff), sub-contractors, sub-consultants, interns, temporary/ part-time personnel or any other party(ies). In continuation of the same, this Policy will be applicable within or outside office premises, on project site, in conference/seminar, on study tour, field visit, etc.

Where bullying occurs between third parties on the premises of the company (for example, between members of third-party audit team), the company will take all steps necessary and reasonable to assist the affected party.

**D. References**

- i. IPE Global’s Code of Conduct Policy;
- ii. IPE Global’s Equity and Diversity Policy.

**E. Definitions**

**Workplace Bullying**

Workplace Bullying is repeated inappropriate behaviour, direct or indirect, whether verbal, physical or otherwise (via phone, text message, email and social media), conducted by one or more persons against another and others, at the place of work and/or in the course of employment, which could reasonably be regarded as undermining the staff member’s right to dignity at work.

**F. Roles and Responsibilities**

**i. Staff Members**

It is the responsibility of the staff members to:

- a. Demonstrate compliance to, and support of this, and any prevailing policies and procedures; at all times, by signing a copy of this Policy as and requested to do so;
- b. Be aware of the issue of bullying and the forms it can take and of the damage it can do to individuals and to the company;
- c. Not engage in any types of behaviour which constitute bullying as indicated in this Policy;

- d. Report any potential breaches of this Policy to their immediate manager and/or Head - Human Resources;
- e. Comply fully and confidentially with any investigation relating to potential breaches of the Policy;
- f. Contribute to building an environment free from Bullying;
- g. Speak out against bullying, if and when witnessed.

## ii. Department/ Practice Heads

- a. Establish and support high standards of professional behaviour in the workplace;
- b. Ensure their team members as aware and informed of this Policy and its application;
- c. Monitor the workplace and take action to stop bullying immediately if it is observed or reported;
- d. Encourage their team member(s) to report instances and respond promptly, seriously and with respect and sensitivity to every complaint;
- e. Advise Head - Human Resources of any potential breach of this Policy.

## iii. Head – Human Resources (HR)

- a. Conduct necessary communication and training across the company, with respect to this Policy at the workplace;
- b. Ensure this Policy is communicated, explained and handed over at the time of orientation of every employee;
- c. Provide advice, guidance and ongoing support to line managers, supervisors and staff members in relation to the Policy and on the complaint resolution process;
- d. Notify any act of bullying as a misconduct under the Code of Conduct policy;
- e. Maintain records of all the cases pertaining to Bullying and its findings.

## G. Policy

It is the Policy of the Company to ensure a safe and supportive environment where all staff members have the right to be respected and have a responsibility to respect each other. The Company expects its workforce to conduct themselves ethically & with integrity and avoid any conduct that results in contradiction of this Policy, whether during normal course of conducting business or out of working hours including on work trips or at work-related events.

### **Repeated behaviours that may constitute Workplace Bullying include, but are not limited to:**

- non-constructive criticism which is personal rather than related to the work performance;
- public humiliation including yelling, screaming, offensive language;
- unwelcome remarks about a person's dress or appearance;
- persistently picking on staff member(s) in front of others or in private;
- gossip, or making defamatory comments;
- threatening with losing your job;
- regularly and deliberately ignoring or excluding staff member(s) from work activities or work-related social events;
- spreading malicious rumours;
- not allowing someone to speak or express himself (e.g., ignoring or interrupting);
- cyber bullying;
- personal insults and use of offensive nicknames;
- intrusion by pestering, spying and stalking;
- copying ("CC") emails that are critical about someone to others, who do not need to know;
- failure to safeguard confidential information;
- withholding information essential to complete a task properly;

- manipulating the ability of someone to do his or her work (e.g., overloading, withholding information, setting deadlines that cannot be met, giving deliberately ambiguous instructions, etc.).

#### **What is not considered to be Workplace Bullying**

- A single incident of unreasonable behaviour;
- Workplace bullying must not be confused with legitimate comments and advice (including negative or constructive feedback or comment) from line managers and supervisors on work performance or work-related behaviour of an individual or group.
- Differences of opinion, performance management, conflicts and personality clashes can happen in any workplace, but usually they do not result in bullying.
- Reasonable management action, carried out in a fair way, is not bullying. Managers have a right to direct the way work is carried out and to monitor and give feedback on performance.

**If any staff member feels that s/he has been bullied, or has witnessed bullying taking place, the Company strongly encourages such staff member(s) to take action by making it clear that such behaviour is unwelcome and offensive; and/or by reporting the incident, in writing, to your Department Head, Head - Human Resources and COO (hereinafter referred to as "the Committee").** Where the incident has been reported, in writing, to Line Manager, it should be forwarded to the Committee, for investigation and resolution.

#### **H. Procedure for Filing Complaints**

Any staff member or personnel of the Company who feels and is being bullied directly or indirectly may submit a complaint of the alleged incident to any member of the Committee in writing with his/her signature (with date).

A complaint must specify the nature of the charge. The charge should include date and time of specific event(s), names of witnesses, and any evidence that support the allegation(s). In addition, it should include the contact details of the aggrieved party such as contact number, department and name(s) of persistent tormentor, etc.

#### **I. Redressal of Complaint**

- i. Following the written complaint, the Committee may investigate any allegations;
- ii. Before initiating inquiry into alleged complaint, at the discretion of aggrieved party, the Committee may, take steps to resolve the matter between the aggrieved party and respondent, through mediation. Mediation provides the opportunity for a good working relationship to be re-established between the parties;
- iii. Where the settlement has been arrived as per point (ii) above, no further inquiry shall be conducted by the Committee. The Committee shall record the details of settlement so arrived and Head - HR shall initiate necessary action as specified in the recommendation;
- iv. Subject to point (i) above, if the complaint has not been resolved through conciliation, the Committee may proceed to initiate inquiry into the complaint. The inquiry shall be completed within a period of 10 days.
- v. If, in the course of the proceedings, the Committee is satisfied that a *prima facie* case of bullying is made out against the respondent(s), then it may, in the interests of justice, recommend Head – HR to transfer such respondent(s) from their present position or suspend, pending inquiry;
- vi. A copy of the complaint will be forwarded to alleged persistent tormentor (respondent) and the Committee shall direct the respondent(s) to submit a written response to the complaint/allegations within time period decided by the Committee;

- vii. The Committee shall allow both parties reasonable opportunity of presenting their case;
- viii. Minutes of all proceedings of investigations by the Committee shall be prepared and duly signed by the members of the Committee. The same shall be maintained by Head – HR.
- ix. The Committee shall record the conclusion of its findings in writing supported with explanations & recommendations in a report and shall forward the same to Head - HR within a period of 5 days from date of completion of inquiry.
- x. If the Committee arrives at the conclusion that allegation against the respondent has been proved, it shall recommend the management of the Company through Head – HR, to take action against the respondent for bullying as a misconduct in accordance with Disciplinary Policy of the Company (also refer Annexure A of this Policy).
- xi. If the Committee arrives at the conclusion that allegation against the respondent has not been substantiated, it shall recommend the management of the Company that no action is required to be taken in the matter.
- xii. In continuation of point (xi) above, if the Committee arrives at the conclusion that allegation/s made against the respondent are found to be unsubstantiated because they are of a frivolous or vexatious nature and/ or made with a false intent and/or aggrieved party has produced false/ misleading document, the Committee may recommend the management of the Company through Head – HR to take action against the aggrieved party in accordance with Disciplinary Policy of the Company (also refer Annexure A of this Policy).
- xiii. If, in the course of the proceedings, the Committee finds that any person/respondent has victimised the aggrieved party and/or person assisting the aggrieved party; even when allegations are found to be unsubstantiated, the Committee shall record the same in writing, with a recommendation to management of the Company through Head - HR to take disciplinary action against such person(s) (also refer Annexure A of this Policy). The Committee shall make the best efforts to protect the interests of the aggrieved party from victimisation.

#### **J. Confidentiality**

In instances of any alleged breach of this Policy, discretion is important to protect all people concerned. Everyone involved in an investigation, either as a witness or as an investigator, must keep the proceedings confidential and not discuss it with anyone. Disclosing information about the investigation could result in disciplinary action.

The Company endeavours to keep the complaint and the details of any investigation as confidential as is reasonably possible, having regard to the rights of all involved in the investigation. However, there may be circumstances where full confidentiality cannot be maintained if the complaint is to be fully investigated in a procedurally fair manner or if disciplinary or corrective action is required.

The obligation of confidentiality does not prevent the Company from disclosing any material necessary to instigate or defend any legal proceedings or make submissions in relation to any legal enquiry or complaint.

#### **K. Miscellaneous**

- i. The decision of the Committee on the matter within its competence shall be considered final and binding on both aggrieved party and respondent.
- ii. The Company will provide the aggrieved party with necessary psychological, emotional and physical support, on request.

#### L. Policy Revisions

Any revisions in this Policy including amendments or changes under respective clauses will be duly notified to employees through email communication. Also, such revised Policy or notification/ circular/ internal communication on such revisions will be updated in the HR Documents>>Policies section of DarwinBox (HR ERP) and Corporate Website ([www.ipeglobal.com](http://www.ipeglobal.com)). The employee shall be deemed to have read, understood and acknowledged the changes thereof which will supersede the terms of current Policy or any subsequent document/communication related to current Policy.

**ANNEXURE A****Possible Disciplinary Actions**

- i. Permanent transfer or suspension without pay, or both.
- ii. Fine equivalent to 2 months' salary that can be credited to Employee Welfare Fund created to be utilised for welfare of employees.
- iii. Stoppage of increment with or without cumulative effect.
- iv. Reduction in level.
- v. Termination/ dismissal from the services of the Company.
- vi. Any other action based on Disciplinary Policy.

## DECLARATION

I hereby declare that I have received, read and understood IPE Global's Anti-Bullying Policy and I agree to abide by it. I will contact Human Resources Department if I have any questions about this Policy.

A copy of this Declaration will be placed in my personnel file.

Signature :

Name :

Department :

Designation :

Date :

Place :