

Policy on Prevention of Sexual Harassment

Version 5.0 – 01 January 2024



Title	Policy owner
Policy on Prevention of Sexual Harassment	Head of Legal – Sinch India
Version	Policy manager
5.0	Head of Legal – Sinch India
Confidentiality level	Approved by
INTERNAL, PUBLISHED ON SINCH INDIA WEBSITE	Managing Director – Sinch India and Head of Compliance – Sinch
Revision interval	Date of approval
At least annually	31-01-2024 and 19-01-2024

Table of Contents

1 Introduction.....	4
1.1 Policy Statement and Purpose.....	4
1.2 Scope and Applicability.....	4
1.3 Definitions.....	4
2 Governance.....	6
2.1 Complaints Committee.....	6
2.1.1 General.....	6
2.1.2 Composition of the Complaints Committee.....	6
2.2 Responsibilities.....	7
2.2.1 Complaints Committee.....	7
2.2.2 Company.....	8
2.2.3 Employees.....	8
2.3 Redressal Procedure.....	9
2.3.1 General.....	9
2.3.2 Complainant.....	9
2.3.3 Complaint Filing Procedure.....	10
2.3.4 Procedure for Conciliation.....	11
2.3.5 Procedure for Conducting Inquiry.....	11
2.3.6 Initiation of Action During Pendency of Inquiry.....	13
2.3.7 Inquiry Report – Inclusion of Suggested Actionable.....	13
2.3.8 Appeals Filing Procedure.....	15

2.4 Other Considerations..... 15

 2.4.1 Complaints Filed in Bad Faith 15

 2.4.2 Confidentiality 15

 2.4.3 Protection against Retaliation..... 16

 2.4.4 Filing of Complaint with Law Enforcement Authority..... 16

3 Report breaches against policy 16

4 Revision history17

1 Introduction

1.1 Policy Statement and Purpose

ACL Mobile Private Limited (formerly ACL Mobile Limited) (henceforth referred to as the **Company** or **Sinch India**) is committed to creating a safe and conducive work environment that enables employees to work without fear of prejudice, gender bias and sexual harassment. The Prevention of Sexual Harassment at Workplace Policy (henceforth referred to as **POSH Policy** or **Policy**) has been drafted in accordance with the provisions of The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (**Law**) as applicable in India.

While the Law is applicable to women employees only, as a healthy practice, the Company has extended the benefit of the Law to its other employees as well, who may belong to any gender. Therefore, this Policy shall be applicable to all complaints of sexual harassment made by anyone against an employee in the context of workplace.

This Policy aims to achieve the following objectives:

- (a) To prohibit workplace sexual harassment in all forms.
- (b) To provide procedures for lodging complaints and investigating sexual harassment claims.
- (c) To carry out appropriate disciplinary measures in the case of violations.

1.2 Scope and Applicability

The Company has a zero-tolerance approach towards any kind of sexual harassment or discrimination caused by any employee, consultant, contractor, vendor, or any person formally associated with them towards any other person being an employee of the Company or that of its partner, client, vendor, or contractor in the premises of the Company or any other workplace of the Company.

This Policy will be reviewed and updated from time to time to ensure that it is current. All updates and revisions to the Policy will be approved by the Managing Director of Sinch India and the Head of Compliance of Sinch. *[Internal Note: "...and the Board of Directors of the Company (Board)" – this requirement being checked].*

1.3 Definitions

For the purpose of this Policy, the following terms and expressions shall have the meanings assigned to them hereunder:

Definition	Description
"Aggrieved Person"	Means an individual, of any gender, of any age who is allegedly subjected, directly or in an implied manner, to the act of Sexual Harassment as defined within the Policy.

"Complainant"	Means any Aggrieved Person or other person who makes a complaint alleging Sexual Harassment under this Policy and as per Law.
"Employee"	Means any person employed at the Company for any work on regular, temporary, or ad-hoc basis either directly or through an agent, on the rolls of the Company including those on deputation, contract, temporary, ad-hoc, probationer, trainee, apprentice, part-time or working as consultants, working on voluntary basis, whether the terms of employment are express or implied.
"Head of Compliance"	Means the individual appointed as the head of compliance of Sinch.
"Internal Committee"	Means the POSH Committee of the Company.
"Respondent"	Means an individual or a group of individuals against whom the sexual harassment complaint has been made under this Policy.
"Sexual Harassment"	<p>Means an unwelcome inappropriate behaviour (whether directly or by implication) which includes:</p> <ul style="list-style-type: none"> (a) Physical contact and advances including touching, deliberately brushing against another person, interference with an individual's normal work movement or assault. (b) Demand or requests for sexual favours, offensive or unwelcome flirtations, unwanted sexual advances or propositions, threats or suggestive or insulting sounds. (c) Making sexually coloured remarks including sexual tones including repeated sexual innuendoes, sexual epithets, derogatory slurs, sexually explicit jokes, letters, phone calls, text, e-mails, WhatsApp or through any other electronic communication. (d) Showing pornography such as derogatory or sexually explicit posters, cartoons, photographs, magazines, drawings, or other printed items; suggestive objects, pictures; emails, screen savers; or other electronic communications; graphic commentaries and leering or obscene gestures. (e) Any other unwelcome visual, verbal, or physical conduct of a sexual nature.
"Sexual Harassment at the Workplace"	<p>Means the following circumstances, if they occur or are present in relation to or connected with any act or behaviour of Sexual Harassment may amount to Sexual Harassment at the Workplace:</p> <ul style="list-style-type: none"> (a) Implied /explicit promise of preferential treatment in employment. (b) Implied/ explicit threat of detrimental treatment in employment. (c) Implied/explicit threat about present or future employment status. (d) Interference with work or creating an intimidating/hostile environment. (e) Humiliating treatment, likely to affect health or safety. <p>Any or all the above behaviours that may be displayed at the Workplace, will amount to Sexual Harassment at the Workplace, notwithstanding the following conditions:</p> <ul style="list-style-type: none"> (a) The Aggrieved Person as well as the Respondent may be of any gender, of any age. (b) The Aggrieved Person and the Respondent may be of the same sex. (c) The Aggrieved Person need not be economically impacted from the incident.

	<ul style="list-style-type: none"> (d) The incident may occur at any other place where the Aggrieved Person is engaged in work related activities for the Company. (e) The incident may occur at any place where the Aggrieved Person interacts with another person with whom the Aggrieved Person has a Workplace relationship.
"Sinch"	Means Sinch AB, a company incorporated under the laws of Sweden and listed on Nasdaq, Stockholm; Company is a part of Sinch group with ultimate holding company as, Sinch AB.
"Visitor" or "Third Party"	Means any person or persons who is visiting the Workplace and is not covered by any of the other categories defined by this Policy. For example, guests or candidates coming for interviews, meetings, events, programs, or people walking in for meeting existing employees, staff, etc.
"Workplace"	Means all places where any Company activity is carried out. It shall include: <ul style="list-style-type: none"> (a) All offices or other premises where Company business is conducted. (b) All Company related activities performed at any other site. (c) Any social, business, or other functions where the conduct or comments may have an adverse impact on the workplace or workplace relations. (d) An alleged act of sexual harassment committed during or outside of office hours using any mode of communication including electronic communication. (e) Any sexual harassment on any social networking website during or outside of office hour. (f) Any place visited by Employee or arising out of or during employment with Company, including transport services if provided by Company for undertaking such journey.

2 Governance

2.1 Complaints Committee

2.1.1 General

A committee to redress complaints on Sexual Harassment has been formed by the Company (**Complaints Committee** or **Internal Complaints Committee**). It is the responsibility of the Complaints Committee to ensure safety of individuals associated with the Company and to ensure that all prevention of Sexual Harassment related practices at the Company are compliant with the provisions of the Law. Matters unresolved at the Complaints Committee shall be referred to the Head of Compliance – Sinch.

2.1.2 Composition of the Complaints Committee

With effect from 01 January 2024, the Complaints Committee comprises:

Location	Complaints Committee Members			
	Presiding Officer	Employee Member	Employee Member	External Member
Noida	Ms. Shuchi Sharma SVP – HR shuchi@sinch.com	Ms. Ira Dhasmana VP – Legal iradhasmana@sinch.com	Mr. Ankur Agrawal SVP – IP Messaging ankuragrawal@sinch.com	Ms. Anuradha Mukherjee Social Worker anuradha_mukherjee@hotmail.com
Mumbai	Ms. Shuchi Sharma SVP – HR shuchi@sinch.com	Ms. Ira Dhasmana VP – Legal iradhasmana@sinch.com	Mr. Akshaya Kumar Batta SVP – Sales akbatta@sinch.com	Ms. Anuradha Mukherjee Social Worker anuradha_mukherjee@hotmail.com
Bengaluru	Ms. Shuchi Sharma SVP – HR shuchi@sinch.com	Ms. Ira Dhasmana VP – Legal iradhasmana@sinch.com	Mr. Madakshira Prahalad Sundar CMO (Fractional) Madakshira.Sundar@sinch.com	Ms. Anuradha Mukherjee Social Worker anuradha_mukherjee@hotmail.com
Chennai	Ms. Shuchi Sharma SVP – HR shuchi@sinch.com	Ms. Ira Dhasmana VP – Legal iradhasmana@sinch.com	Mr. Nagesh Goyal SVP – Operations nagesh@sinch.com	Ms. Anuradha Mukherjee Social Worker anuradha_mukherjee@hotmail.com
Kochi	Ms. Shuchi Sharma SVP – HR shuchi@sinch.com	Ms. Ira Dhasmana VP – Legal iradhasmana@sinch.com	Mr. Nagesh Goyal SVP – Operations nagesh@sinch.com	Ms. Anuradha Mukherjee Social Worker anuradha_mukherjee@hotmail.com

2.2 Responsibilities

2.2.1 Complaints Committee

- Receive and address complaints of Sexual Harassment in a confidential and time-bound manner.
- Ensure that the mechanism for registering complaints is safe, accessible, and conducted with the due sensitivity necessitated by the situation.
- Conduct inquiries diligently, provide aid and redressal to Aggrieved Persons, recommend penalties and take necessary action against the Respondent.
- Ensure quorum of minimum 03 (three) members during all inquiry meetings, with mandatory presence of the Presiding Officer at all inquiry meetings.
- Follow the principles of natural justice and treat the Complainant, Respondent, witnesses, and related persons to the inquiry with dignity and respect and give both the Complainant and the Respondent a fair opportunity to make their submissions.
- Act without any prejudice or bias while conducting inquiries or dealing with complaints.
- Make efforts to ensure that the Complainant and the witnesses are not further victimized or discriminated against while the complaint is pending.

- (h) Recuse themselves from their assigned job for the purpose of conducting an inquiry if there is conflict of interest or a bias coming in the way of conducting a fair inquiry.
- (i) Document in detail all the inquiry proceedings and the inquiry report.
- (j) Refrain from talking about a potential, pending, or completed case with any member directly or indirectly connected to any form of media, including print, television, online, etc.
- (k) Where the Respondent's conduct amounts to a specific offence under the Indian Penal Code or under any other law, initiate action in accordance with the Law by making a complaint with the appropriate government authority.

2.2.2 Company

- (a) Provide a safe working environment; not tolerate any act of Sexual Harassment and treat Sexual Harassment as Misconduct.
- (b) Organize prevention of Sexual Harassment workshops and awareness programs at regular intervals.
- (c) Display at conspicuous place in the Workplace, the penal consequences of Sexual harassment and the order constituting the Complaints Committee.
- (d) Ensure that necessary facilities and information are provided to the Complaints Committee for dealing with complaints and conducting inquiries.
- (e) Assist in securing the attendance of Respondent and witnesses before the Complaints Committee and make available such information to the Complaints Committee as it may require with regards to the complaint.
- (f) Assist the Complaints Committee in any manner feasible to conduct a fair and expeditious inquiry and implement recommendations made by Complaints Committee.
- (g) Assist the Complainant if the Complainant chooses to file a complaint in relation to the offence under the Indian Penal Code.
- (h) Cause to initiate action, under the Indian Penal Code, against the Respondent or if the Complainant so desires, where the Respondent is not an employee, in the workplace at which the incident of sexual harassment took place.

2.2.3 Employees

- (a) Report any inappropriate behaviour including, Sexual Harassment immediately.
- (b) Support and cooperate during any inquiry of a complaint, including testifying as witness and giving full and truthful disclosure of all information when enquired by the Complaints Committee, while ensuring that complete confidentiality is maintained throughout.

- (c) Handle information related to known or suspected violations of this Policy in a discreet and confidential manner and not attempt to investigate / inquire into the information or suspected violations of this Policy on your own i.e., without involving the Complaints Committee.
- (d) Not misuse the Policy or the Law by filing malicious complaints for settling personal scores, seeking revenge or for personal gains, benefits, etc.

2.3 Redressal Procedure

2.3.1 General

Complainant may lodge a complaint with the Complaints Committee, in writing.

- (a) complaint may be lodged electronically, by emailing at poshcomplaint@sinch.com, or
- (b) complaint may be lodged physically, by writing to ACL Mobile Private Limited, Unit No 4701, 7th Floor, Tower - 4, Express Trade Tower - 2, Sector - 132, Noida - 201301, India, addressed to, Ms. Shuchi Sharma and Ms. Ira Dhasmana, or
- (c) complaint may be lodged using the SpeakUp Reporting Line at <https://clxgroup.sharepoint.com/sites/GroupLegalInfo/SitePages/SpeakUp.aspx>.

2.3.2 Complainant

If the Complainant is unable to make a complaint on account of their *physical incapacity*, a complaint may be filed, with the written consent of the Complainant by:

- (a) their relative or friend; or
- (b) their co-worker; or
- (c) an officer of the National Commission for Women or State Women's Commission; or
- (d) any person who has knowledge of the incident.

If the Complainant is unable to make a complaint on account of *mental incapacity*, a complaint may be filed by:

- (a) their relative or friend; or
- (b) a special educator; or
- (c) a qualified psychiatrist or psychologist; or
- (d) the guardian or authority under whose care they are receiving treatment or care; or

- (e) any person who has knowledge of the incident jointly with the Complainant's relative or friend or a special educator or qualified psychiatrist or psychologist, or guardian or authority under whose care they are receiving treatment or care.

If the Complainant is unable to make a complaint, a complaint may be filed by any person who has knowledge of the incident, with their written consent.

If the Complainant is *deceased*, a complaint may be filed by any person who has knowledge of the incident, with the written consent of their legal heir.

If any Employee or Third Party is sexually harassed by any external party who is not an Employee of the Company, either at the Workplace or in that external party's premises, then Complaints Committee will contact the Complaints Committee of that external party and/or law enforcement authority (as the case maybe), on the written complaint of such Employee or Third Party and address the matter to satisfactory closure. Alternatively, Employee or Third Party may choose to reach out directly to Complaints Committee of the external party and/or law enforcement authority (as the case may be) and the Company will assist on written request of the Employee or Third Party.

2.3.3 Complaint Filing Procedure

Complainant must adhere to the following while making a complaint to the Complaints Committee.

- (a) Complaint must be in writing.
- (b) Complainant should provide (if possible) as many specific details as possible including incidents, dates and people that are involved. Details with respect to the following may be provided while filing a complaint:
- alleged event, matter or issue that is subject to the complaint (time/date/place, etc.).
 - the name and details of the Employee (Respondent) against whom the complaint is being filed.
 - names and addresses of the witnesses (if any).
 - details of documentary evidence (if any) such as WhatsApp, SMS, Email, CCTV footage, Audio/Video recording, etc.
 - any additional information, documentation, or other evidence available to support the complaint.
- (c) Complaint must be made within a period of 03 (three) months from the date of incident and in case of a series of incidents, within a period of 03 (three) months from the date of last incident.
- (d) Complaints Committee, at its discretion, may extend the time limit for receiving a complaint for another period of 03 (three) months if it is satisfied that the circumstances were such which

prevented the Complainant from filing a complaint within the first 03 (three) months. Such reasons for extension grant shall be recorded in writing by the Complaints Committee.

2.3.4 Procedure for Conciliation

Prior to initiating an inquiry, the Complaints Committee may, at the written request of the Complainant, take steps to settle the matter between the Complainant and the Respondent through conciliation. The following needs to be adhered to with respect to conciliation:

- (a) Monetary settlement may not be made.
- (b) If a settlement is reached, the Complaints Committee will provide copies of the settlement to the Complainant and the Respondent.
- (c) If a settlement is reached, the Complaints Committee will record it and report it to the Board of Directors.
- (d) If a settlement is reached, the Complaints Committee will not be required to conduct any further inquiry.
- (e) If the Complainant feels that the terms of settlement are not being complied with by the Respondent or action has not been taken by the Company, Complainant can make a written complaint to the Complaints Committee to conduct an inquiry into the complaint.

2.3.5 Procedure for Conducting Inquiry

If the Complainant does not wish to go for conciliation or if the settlement is not complied with by either Complainant or Respondent, the Complaints Committee will, upon a written request from the Complainant, initiate an inquiry into the complaint. The following needs to be adhered to with respect to conducting inquiry:

- (a) On receipt of the complaint, the Complaint Committee shall send a copy of the complaint received from the Complainant to the Respondent within a period of 07 (seven) days.
- (b) Respondent will file a reply to the complaint within a period of 07 (seven) days from the date of receipt of the complaint.
- (c) Complainant and/or Respondent will provide the name(s) of witness (if any) in writing to the Complaints Committee.
- (d) Self-attested copies of documents (if any) which the Complainant and/or the Responded want to submit will be supplied to the Complaints Committee.
- (e) Complaints Committee will summon and enforce the attendance of any person, conduct examination, request the discovery and production of documents/information. Refusal by any

Employee to attend any hearing before the Complaints Committee when summoned or to provide any document/information will constitute misconduct.

- (f) Complaints Committee may terminate the inquiry proceedings or give an ex-parte decision on the complaint, if the Complainant and/or Respondent fail, without sufficient cause, to present themselves, for 03 (three) consecutive hearings convened by the Presiding Officer. Such termination may not be undertaken, or ex-parte order may not be passed without giving 15 (fifteen) days advance written notice to the Complainant and/or Respondent, as the case maybe.
- (g) Complaint shall be heard by a minimum of 03 (three) members including the Presiding Officer and the External Member.
- (h) Complaints Committee will complete the inquiry within reasonable period but not beyond 90 (ninety) days.
- (i) Complaints Committee will notify in writing, the time, and dates of its meetings to the Complainant, the Respondent, and witnesses.
- (j) Inquiry proceedings will be documented in detail and be treated as strictly confidential with restricted viewing only on need-to-know basis.
- (k) All Employees and witnesses who are part of the Complaints Committee proceedings will keep all information pertaining to the proceedings strictly confidential.
- (l) Inquiry proceedings will be recorded in writing. They may be audio recorded (where possible). The minutes/transcribed record of the proceedings and the statement of witnesses will be endorsed by the persons concerned and Complaints Committee.
- (m) The Complainant and Respondent will not be allowed to bring in any legal practitioner to represent them in their case at any stage of the proceedings before the Complaints Committee.

Other Considerations

- (n) Complaints Committee will make an inquiry into the complaint in accordance with the principles of natural justice such that Complaints Committee will provide every reasonable and fair opportunity to the Complainant as well as to the Respondent, for putting forward and defending their respective side.
- (o) Complaints Committee will be sensitive to the often covert, private, and insidious nature of Sexual Harassment and will take into account that often the Complainant may not be able to submit or present direct or corroborative evidence.
- (p) Complaints Committee will take note of the respective socio-economic positions of the Complainant and the Respondent, their hierarchy in the workplace, and other power differentials while giving recommendation.

2.3.6 Initiation of Action During Pendency of Inquiry

During the pendency of an inquiry and upon the written request of the Complainant, the Complaints Committee may recommend any of the following to Company:

- (a) *In case Complainant and/or Respondent are Employees, any one or more of the following may be recommended –*
- Grant leave to the Complainant for up to a period of 03 (three) months (the leave granted shall be in addition to the leave the Complainant is otherwise entitled to).
 - Transfer the Complainant or Respondent to any other Workplace.
 - Restrain the Respondent from reporting on the work performance of the Complainant and assign the same to another employee (if applicable).
 - In case the complaint has been filed by an intern or an apprentice working under the Respondent, restrain the Respondent from supervising any official/academic activity of the Complainant and assign the same to another employee.
- (b) *In case Respondent is a Third Party, any one or more of the following may be recommended –*
- Direct the Company to take adequate action to ensure that the Respondent does not enter the Workplace or contact the Complainant and/or witnesses.
 - With consent of the Complainant, report the Respondent to law enforcement authority, if required.

2.3.7 Inquiry Report – Inclusion of Suggested Actionable

On completion of the inquiry, the Complaints Committee will provide a written report of its findings and recommendations to the Company within 10 (ten) days of the date of completion of the inquiry. Such report will also be made available to the Complainant and the Respondent.

The inquiry report will provide (i) details of the allegations made by the Complainant against the Respondent, and (ii) copies of the statements made by, and the evidence presented by, the Complainant and Respondent and/or their respective witnesses, and (iii) Complaints Committee's findings along with a statement giving reasons for recommendations and the findings arrived at by the Committee.

- (a) *In case allegations against Respondent have not been proven –*

If the Complaints Committee concludes that allegations against the Respondent have not been proven with substantive evidence, it will recommend that the Company take no action against the Respondent and close the matter.

(b) *In case allegations against Respondent have been proven –*

Where the Complaints Committee determines that Sexual Harassment has taken place, to whatever extent, immediate corrective and preventive measures will be recommended. Where Respondent is an Employee, any one or more of the following may be recommend:

- Written apology from the Respondent.
- Issue letter of warning to the Respondent (which will also be appended to the Employee's HR record).
- Reprimand the Respondent.
- Withhold promotion or demote the Respondent.
- Withhold salary increment of the Respondent.
- Immediate transfer or suspension of the Respondent without pay.
- Employment termination of the Respondent.
- Compulsory counselling of the Respondent.
- Compulsory community service.
- Deduction from salary or wages of the Respondent such sum as it may consider appropriate to be paid to the Complainant or to their legal heirs. In case, the Company is unable to make deductions from salary of the Respondent due to them being absent from duty or cessation of employment, it may direct the Respondent to pay such sum to the Complainant. In case the Respondent fails to pay the sum, the Complaints Committee may forward the order for recovery of the sum as an arrear of land revenue to the concerned District Officer.

Complaints Committee may consider various factors as required under Law for the purpose of determining the sums to be paid to the Complainant and may take the following into consideration:

- the mental trauma, pain, suffering, and emotional distress caused to the Complainant.
- the loss in the career opportunity due to the incident of sexual harassment.
- medical expenses incurred by the victim for physical or psychiatric treatment.
- the income and financial status of the Respondent.
- feasibility of such payment in lump sum or in instalments.

Where the Respondent is a Third Party, Complaints Committee may recommend any one or more of the following:

- Warning to employing organization/association/firm (if any).
- Declaring the Workplace out of bounds to the Respondent.
- Withdrawal of the right to provide services to the Company for a certain period (if applicable).

- Helping the Complainant to file a First Information Report with law enforcement authority, should they desire.
- Debarring/blacklisting the Respondent from the Company.
- Other similar or appropriate punishment.

The Company shall act upon the recommendation of the Complaints Committee within 60 (sixty) days of receipt of the recommendation.

2.3.8 Appeals Filing Procedure

If any person is aggrieved from the recommendations made by the Complaints Committee or in the event of non-implementation of such recommendations, they may appeal to the appropriate authority, as specified by Law, within a period of 90 (ninety) days of the recommendations.

2.4 Other Considerations

2.4.1 Complaints Filed in Bad Faith

If on inquiry, it is revealed that the complaint was made with a malicious intent and with the motive of maligning the Respondent/tarnishing their image or otherwise and/or to settle personal/professional scores, strict action will be recommended by Complaints Committee against the Complainant. Hence, in case Complaints Committee arrives at a conclusion that allegation against the Respondent is malicious or Complainant has made the complaint knowing it to be false or has produced a forged or misleading document, POSH Committee may recommend to the Company to take an action against the Complainant as specified above and as applicable.

A mere inability to substantiate a complaint or provide adequate proof need not attract action against the Complainant as the malicious intent on the part of the Complainant will have to be established through the inquiry process before an action against such Complainant is recommended.

2.4.2 Confidentiality

Matters pertaining to an incident of Sexual Harassment will be kept confidential. Specifically, content of the complaint, identity and address of the Complainant, Respondent and witnesses (if any), any information relating to conciliation and inquiry proceedings, inquiry report including recommendations of

the Complaints Committee, and action taken, will not be published, communicated or made known to the public, press, or media in any manner. However, information may be disseminated regarding the justice secured to any victim without disclosing the name, address, identity, or any other particulars which may lead to the identification of the Complainant and witnesses (if any). Appropriate information will be shared as per Law.

If any person (including the Complainant and/or any witness) discloses confidential information, the Company will recover a sum of INR 5,000/- as penalty from such person and may take any other action as it may deem fit.

2.4.3 Protection against Retaliation

Company will ensure that retaliation is not faced by anyone who, in good faith, files a complaint or participates, in any way, in the inquiry of a complaint. Individuals found to be engaging in retaliatory conduct will be subject to strict disciplinary action and if necessary, legal action, which may include filing of complaint with law enforcement authority. If an Employee suspects that someone they know has been retaliated against for raising an issue, they are encouraged to immediately contact the Compliance Committee.

2.4.4 Filing of Complaint with Law Enforcement Authority

This Policy does not preclude anybody from simultaneously lodging a complaint with law enforcement authority in respect of any act amounting to an offence under the Law. If any assistance is sought, the Company will provide the same.

3 Report breaches against policy

ACL Employees shall report suspected or actual breaches of this Policy. A report can be made to:

- Your manager, Head of Legal – ACL Mobile Private Limited and/or Head of Compliance – Sinch
- Sinch Integrity Reporting Line: compliance@sinch.com

All reports will be handled confidentially. Sinch does not tolerate any form of retaliation against individuals who report violations or suspected violations of this Policy in good faith.

4 Revision history

Version	Revision date	Author	Description
1.0	01-05-2013	Shuchi Sharma - Head of HR - ACL	First version
2.0	03-12-2018	Shuchi Sharma - Head of HR - ACL	Second version
3.0	12-04-2021	Shuchi Sharma - Head of HR - ACL	Third version
4.0	03-03-2022	Shuchi Sharma - Head of HR - ACL	Fourth version
5.0	01-01-2024	Ira Dhasmana - Head of Legal - ACL	Fifth version Applicable law related updates have been incorporated, complaints committee has been reconstituted, complaint lodging via SpeakUp reporting line and email ID has been incorporated.