

1. Objective

The objective of this policy is to provide guidelines relating to Prevention of Sexual Harassment at Workplace in line with The Sexual Harassment of Women at Workplace (Prevention, Prohibition, and Redressal) Act, 2013, as amended from time to time.

2. Scope

This policy shall be applicable to all written complaints of sexual harassment made:

- a. By an employee of the company against an employee of the company working within or outside India.
- b. By an employee of the customer or client company working within or outside India.
- c. By an employee of the company against an outsider, visitor, professional or consultant, who may have caused sexual harassment to her during the course of her employment and within the premises of company, in India or outside of the country, of the company or its client or customer company.
- d. By any female/male against a male/female employee of the company working within or outside of India only if the act of sexual harassment occurred during the course of employment and within the premises of the company's in India or outside the country, of the company, or its client or customer company.
- e. This policy shall also be applicable to occurrence of sexual harassment perpetrated by a female to male employee and / or by persons having homosexual orientation.

3. Definition

Sexual harassment would mean and include the following, jointly or severally:-

3.1 Any unwelcome behavior with sexual undertones which has been directed against a person either directly or indirectly. The unwelcome behavior could be in the form of

- i) Physical contact and advances/ offensive language
- ii) Demand or request for sexual favors
- iii) Making sexually colored remarks or/and bawdy humor
- iv) Showing any pornographic material
- v) Any other unwelcome physical, verbal or non-verbal conduct of sexual nature.

3.2 Sexual harassment cases can be classified into two categories: –

- i) Quid pro quo
- ii) Creation of a hostile working environment

Under the quid pro quo form of harassment, a person or authority, usually the superior of the victim, demands sexual favors for getting or keeping a job benefit and threatens to fire the employee if the conditions are not met.

A hostile work environment arises when a co-worker or supervisor creates a work environment through verbal or physical conduct that interferes with a co-worker's job performance or creates a workplace atmosphere which is intimidating, hostile, offensive



or humiliating and an attack on personal dignity. Sexual harassment and abuse damage both, individual and Organizational Health.

4. Internal Complaints Committee(ICC)

- 4.1 To deal with the complaints pertaining to sexual harassment, every location shall constitute an ICC, as specified by the applicable Act consisting of,
- One Presiding Officer who shall be a woman employed at a senior level of the unit; in case a senior level woman employee is not available, the presiding officer shall be nominated from other offices/ units
 - Minimum two additional members from amongst employees preferably with legal or social work experience , and
 - One External member (having knowledge in the field)
- 4.2 Not less than 50% of the Committee members shall be women employees.
- 4.3 The ICC shall meet once a quarter, even if there is no live case, and review preparedness to fulfill all requirements.
- 4.4 The minutes of every meeting shall be recorded in the Minutes Register maintained for the purpose.

5. Honorarium to the External Member

The CHRO from time to time decides on the honorarium to be paid the External Member.

6. Complaint and Complaint Resolution Mechanism

- 6.1 The sexual harassment complaint shall be submitted to the Presiding Officer or any member of the Internal Complaints Committee (ICC) ideally within three days but no later than three months from the date of incident.
- 6.2 The ICC will hold a meeting with the Complainant within five days of the receipt of the complaint, but no later than a week in any case.
- 6.3 ICC before initiating enquiry, at the request of the complainant, shall take steps to settle the matter between complainant and the defendant through conciliation, subject to defendant accepting the mistake.
- 6.4 In the event, the complaint does not fall under the purview of Sexual Harassment or the complaint does not mean an offence of Sexual Harassment, the same would be dropped after recording the reasons thereof.
- 6.5 The Committee shall prepare and hand over the Statement of Allegation to the person against whom the complaint is made and give him / her an opportunity to submit a written explanation if she / he so desires within 7 days of receipt of the same.
- 6.6 If the Complainant or the person against whom complaint is made desires any witness(es) to be called, they shall communicate in writing to the Committee the names of witness(es) whom they propose to call.
- 6.7 If the Complainant desires to tender any documents by way of evidence before the Committee, she / he shall supply original copies of such documents. Similarly, if the

person against whom complaint is made desires to tender any documents in evidence before the Committee he /she shall supply original copy of such documents.

6.8 The Committee shall complete the "Enquiry" within reasonable period but not beyond three months and communicate its findings and its recommendations for action to the Management. Upon receipt of the enquiry report from the committee, the Management shall take appropriate action commensurate with gravity of offence e.g. warning, written apology, bond of good behavior, suspension, dismissal.

6.9 In case the conduct disclosed in the Committee's report is of a nature that amounts to a criminal offence, appropriate action shall be initiated by the Management, for making a police complaint in respect of the same.

6.10 The decision of the Committee on any matter within its competence shall be considered final and no appeal /challenge to the same shall lie to any person.

7. Confidentiality

All information received shall be kept strictly confidential. Any persons (including witnesses) who breaches confidentiality shall be subject to disciplinary action.

8. Complaints made with malicious intent

This policy has been evolved as a tool to ensure that in the interest of justice and fair play, our employees have a forum to approach in the event of instances of sexual harassment. However, if on investigation it is revealed that the complaint was made with malicious intent and with the motive of maligning the concerned individual / tarnishing his / her image in the Company and to settle personal/professional scores, strict action will be taken against the complainant. The employees who are victims of sexual harassment may, in addition to the above, seek legal remedies as may be provided under the various laws for the time being in force.

9. Power to Amend

The Management reserves the right to amend the policy anytime without assigning any reason whatsoever but within the guidelines of The Sexual Harassment of Women at Workplace (Prevention, Prohibition, and Redressal) Act, 2013.

The utility and interpretation of the policy will be at the sole discretion of the Management.

Proposed by

CHRO



Approved by

Chairman & Managing Director

