
ANTI-SEXUAL HARASSMENT POLICY

Policy

_____ (the “Company”) strives to give an inclusive working experience to all its employees regardless of gender identity, sexual orientation, ethnicity, nationality, race, caste, age, religion, colour, marital status or disability.

Sexual harassment (defined in clause 3) is a grave offence, as it violates the fundamental rights of a women to equality, to her life, to live with dignity and the right to practice any profession which includes a right to safe environment free from any sexual harassment.

The Supreme Court through its latest legislation “The Sexual Harassment Of Women At Workplace (prevention, prohibition and redressal) Act, 2013” has laid down guidelines relating to sexual harassment and this policy totally conforms to it.

All the employees of the Company are expected to up hold the highest standards of ethics and values.

The Company has a zero tolerance policy towards violation of this policy and will respond appropriately.

Scope

This policy applies to all the employees of the Company and is deemed to be incorporated in the service conditions of all the employees of the Company.

The workplace or office includes the main office in _____ and all the subsequent branches in India and abroad. Local country laws will take precedence over this policy, in other geographies, if applicable.

Employees include but are not limited to permanent and temporary workers, interns, associates and project linked personnel.

Definition of Sexual Harassment

“Sexual Harassment” includes any one or more of the following unwelcome acts or behaviour towards a women employee whether directly or by implication –

- Physical contact and advances
- A demand or request for sexual favours
- Making sexually coloured remarks
- Showing pornography
- Any other unwelcome physical, verbal or non-verbal conduct of sexual nature
- Implied or explicit promise of preferential treatment in her employment
- Implied or explicit promise of detrimental treatment in her employment
- Implied or explicit threat about her present or future employment status
- Interference with her work or creating an intimidating or offensive or hostile work environment for her
- Humiliating treatment likely to affect her health and safety

Internal Complaints Committee

Our Company has an Internal Complaints Committee (ICC) for redressal of sexual harassment complaints and comprise the following people:

_____ – Chairperson
_____ – Member
_____ – Member

Complaint Process

A complainant can make in writing, a complaint of sexual harassment to the ICC, within a period of three months from the incident and in case of a series of incidents, within a period of three months from date of last incident against the respondent.

If the complainant is unable to make a complaint on account of her physical incapacity a complaint may be filed by her friend, relative, co-worker or any person who has the knowledge of the incident, with the written consent of the complainant.

The complaint has to be filed in the form (Complaint Registration Form) annexed as Annexure A in this policy and submitted physically or electronically to an ICC member.

The ICC may, but shall not be bound to accept oral complaints under this policy. Each complaint will be dealt with in accordance with the following:

Meeting: The committee will hold a meeting within five days of receipt of the complaint, but no later than a week in any case. At the meeting, the Committee members shall hear and record the allegations. The Complainant may also submit any documentary proof oral or written material to substantiate her complaint. Thereafter, the respondent will be informed about the allegations and will be given an opportunity to give an explanation. An inquiry will then take place and the matter shall be concluded.

Confidentiality: Any allegation of discrimination or harassment brought to the attention of the Committee will be discreetly addressed. Investigations will be conducted in a confidential manner to the greatest extent possible. However, both the parties shall, in the course of inquiry, be given an opportunity of being heard and a copy of the findings shall be made available to both the parties enabling them to make a representation before the committee. All participants in the process, including the complainant, the respondent and the witnesses, will be advised to keep the matter confidential.

Cooperation: The Company expects faculty, staff and other members of the Company to cooperate fully in the investigation process. Any faculty or staff member who is the subject of, or potential witness regarding, a harassment complaint and refuses to cooperate in an investigation is subject to disciplinary action.

Dealing with non-Company offender: The Company's ability to discipline an individual who is not an employee or student (such as a vendor or contractor) is limited by the degree of control, if any, the Company has over such individual. Nonetheless, the Company will seek to take appropriate action in response to violations of this Policy to the extent possible. Sexual

harassment will be treated as a misconduct. If anyone is found guilty the institute will take disciplinary action as per the recommendations of the ICC.

False complaint: Where the ICC concludes that the complaint against the respondent is malicious, or the complaint has been filed knowing that it is false, or the complainant has produced forged or misleading documents, appropriate disciplinary action can be taken against the complainant.

Inquiry Process

The ICC will immediately proceed with the inquiry. The Committee shall give ample opportunity to both the complainant and the respondent to defend their respective cases by way of documentary proof and witnesses.

The ICC shall complete the inquiry process within a reasonable period of time and communicate its findings and recommendations through a report to the top management of the company.

Punishment

In case, the respondent is found guilty, appropriate action will be taken by the management.

Penal consequences include and are not limited to paying a monetary compensation to the complainant, getting suspended or even terminated from the company or any other punishment deemed appropriate by the management.

Additionally, under the IPC (Indian Penal Code) a person charged with sexual harassment may be arrested without a warrant.

Conclusion

The Company reiterates its commitment to provide the women employees, a workplace free from harassment/discrimination and where every employee is treated with dignity and respect.

ANNEXURE – A

COMPLAINT REGISTRATION FORM

Date: _____

Name of the Employee: _____

Designation: _____

Reporting Manager: _____

Details of the

Complaint: _____

Signature of the employee: _____