

# **POLICY ON PREVENTION, PROHIBITION AND REDRESSAL OF SEXUAL HARASSMENT**

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**Summary:** The Company strives to provide a professional work environment free of sexual harassment, exploitation and intimidation. Where sexual harassment is found to have occurred, the Company will promptly act to stop the harassment, prevent its recurrence, and discipline and/or take any other steps that it deems appropriate, against those responsible.

## **1. GENERAL**

### **1.1 APPLICABILITY**

- The Policy is applicable to regular, temporary, ad hoc employees, individuals engaged on daily wage basis, either directly or through an agent, contract labour, co-workers, probationers, trainees, and apprentices, with or without the knowledge of the principal employer, whether for remuneration or not, working on a voluntary basis or otherwise, whether the terms of employment are express or implied.
- The policy is applicable at the workplace and a workplace covers within its scope places visited by employees during the course of employment or for reasons arising out of employment - including transportation provided by the employer for the purpose of commuting to and from the place of employment.
- This Policy shall apply to all allegations of Sexual Harassment (as defined in this Policy), The Policy shall also apply in respect of all complaints of Sexual Harassment made by a third party against an employee, or vice versa if the Sexual Harassment is alleged to have taken place within the Company's premises and/ or during the course of such Employee's employment.
- This policy is not designed as a substitute for legal proceedings; legal recourse shall vest within the appropriate jurisdiction of the applicable court (civil or criminal) depending on the nature of offence. However when a complaint is made, the Organization shall make all efforts to address the complaints in a fair, pragmatic, objective and efficient manner, to prevent and prohibit such behavior and to provide a friendly working environment for one and all, taking 'Principles of Natural Justice' into consideration.
- This Policy is not intended to impair or limit the right of anyone seeking a remedy available under law. Proceedings under this Policy shall continue notwithstanding any proceedings initiated by a complainant against an alleged perpetrator under any law in force.

### **1.2 PROFESSIONAL RESPECT**

- It is the endeavor of the company to provide a place of work free of sexual harassment, intimidation or exploitation. It is expected that the Employees and any other individual covered by this Policy will treat one another with utmost professional respect.

### **1.3 PROMPT ACTION**

- Reports of Sexual Harassment are taken extremely seriously by the Company and will be dealt with promptly. The specific action taken in any particular case depends on the nature and the gravity of the conduct reported, and may include intervention, mediation, investigation and the initiation of grievance and disciplinary proceedings as mentioned in this Policy. Where Sexual Harassment is found to have occurred, the Company will act promptly to stop the harassment, prevent its recurrence, and discipline and/or take other appropriate action against those responsible.

### **1.4 CONFIDENTIALITY**

- The Company recognizes that confidentiality of all matters relating to alleged acts of Sexual Harassment is of paramount importance. Special Counselors (as defined herein), the Complaints Committee (as defined herein), and other individuals responsible for the implementation of this Policy will respect the confidentiality and privacy of individuals reporting or accused of Sexual Harassment to the extent reasonably possible. Examples of situations where confidentiality cannot be maintained include circumstances when the Company is required by law to disclose information (such as in response to legal processes) and when disclosure is required by the Company's outweighing interest in protecting the rights of others.

### **1.5 PROTECTION AGAINST RETALIATION**

- Retaliation and/or reprisals against an individual who in good faith reports or provides information in an investigation about behavior that may violate this Policy are against the law and will not be tolerated by the Company under any circumstances. Intentionally making a false report of Sexual Harassment or providing false information however is grounds for immediate disciplinary action.

### **1.6 RELATIONSHIP TO FREEDOM OF EXPRESSION**

- The Company appreciates that vigorous discussion and debate are essential in order for it to maintain and foster its excellent work product and the atmosphere of friendliness in its workplace. Sexual Harassment however, is neither legally protected expression nor is it a proper exercise of expression; it compromises the integrity of the Company, its tradition of being a fair and just employer; and the trust placed by it in its Employees.

## **2. DEFINITION OF SEXUAL HARRASSMENT AND EXAMPLES**

### **2.1 DEFINITION OF SEXUAL HARASSMENT**

- "Sexual Harassment" means unwelcome sexually determined behavior/ conduct (whether directly or by implication) such as:
  - i. physical contact and advances;
  - ii. a demand or request for sexual favors;
  - iii. sexually-colored remarks;
  - iv. showing pornography (through print, electronic or any other media);
  - v. any other unwelcome physical, verbal or non-verbal conduct of a sexual nature,

**where:**

- a. submission to or rejection of such behavior/ conduct is made, explicitly or implicitly, an adverse consequence in relation to an individual's chances of being recruited, promoted, transferred, rates of pay, benefits, or a term or condition thereof; or
- b. such behavior/ conduct directed against an individual persists despite its rejection; or
- c. such conduct has the purpose or effect of unreasonably interfering with an individual's professional performance; or
- d. such conduct has the purpose or effect of creating what a reasonable person would view as an intimidating or hostile environment.

## **2.2 EXAMPLES OF ACTIONS OF SEXUAL HARASSMENT**

Prohibited actions of Sexual Harassment would include:

i. **Unwelcome sexual advances**

- These include patting, pinching, brushing up against, winking at, hugging, kissing, fondling, or any other similar physical contact considered unwelcome by another individual.

ii. **Requests for demands for sexual favors**

- These include subtle or blatant pressures or requests for any type of sexual favors accompanied by an implied or stated promise of preferential treatment or negative consequence concerning an individual's employment status.

iii. **Sexually-colored remarks**

- These include verbal abuse or joking that is of a sexual nature and considered unwelcome by another individual. For example, comments about an individual's body or appearance where such comments are beyond mere courtesy, telling "dirty jokes" that are clearly unwelcome and considered offensive by others or any other tasteless, sexually-oriented comments, innuendoes or actions that offend others.

### **General**

- In addition to the above, determining what constitutes Sexual Harassment depends upon the facts and the context in which the conduct occurs. Sexual Harassment may take many forms - subtle and indirect, or blatant and overt. For example:
  - i. It may be conduct towards an individual of the opposite sex or the same sex;
  - ii. It may occur between peers or between individuals in a hierarchical relationship;
  - iii. It may be aimed at coercing an individual to participate in an unwanted sexual relationship or it may have the effect of causing an individual to change behavior or work performance;
  - iv. It may consist of repeated action or may even arise from a single incident if sufficiently flagrant.

### 3. PROHIBITION OF SEXUAL HARASSMENT

- 3.1 Sexual Harassment by any Employee of the Company is strictly prohibited. Sexual Harassment of an individual violates such individual's fundamental rights to gender equality, to life and liberty and to work with human dignity, and is further in clear conflict with the Company's commitment and policies to create and maintain a work environment that is free from all such unlawful discrimination. This prohibition is equally applicable to both men and women, and to the same or opposite gender relationships, relationships between supervisors and subordinates, and relationships between peers.
- 3.2 Any Employee found guilty of committing act(s) of Sexual Harassment shall be liable to be terminated from employment/ service/ relationship with the Company, with immediate effect.
- 3.3 It is further clarified that the making of any patently false or malicious allegation/s of Sexual Harassment, or providing patently false information in a proceeding to determine Sexual Harassment would also result in the accused individual being liable to disciplinary proceedings and penalties in accordance with this Policy and/ or the applicable policies of the Company.
- 3.4 Sexual harassment will be treated as misconduct under the service rules and action will be initiated for such misconduct.

### 4. AUTHORITIES DEALING WITH ALLEGATIONS OF SEXUAL HARASSMENT

#### 4.1 SPECIAL COUNSELORS

- The Company shall designate one or more of its senior women employees as a Special Counselor/s at its premises whose services shall be available to the Employees of the Company at reasonable times. Please refer to Annexure for the designated Special Counselors.

#### 4.2 COMPLAINTS COMMITTEE

i. Constitution

The Company shall constitute a committee, which would deal with all formal complaints and allegations of Sexual Harassment (the "Complaints Committee"). The Complaints Committee shall consist of (i) a Chairperson (also referred as the "Presiding Officer"); who shall necessarily be a woman plus (ii) not less than 2 members from amongst the employees; and (iii) 1 member from a non-governmental organization or association who shall be familiar with the issue of sexual harassment (the "Independent Member"); all individually referred as "Member" and jointly as "Members". The Independent Member shall be paid remuneration as set<sup>d</sup> decided by the Company.

- The names of the Members of the Complaints Committee along with their contact details shall be displayed, from time to time, on the notice boards(s) at each of its offices/premises across the country, and/or the internal website of the Company. The Company shall also regularly and promptly notify (in the aforesaid manner) any changes in the constitution of the Complaints Committee, or to the contact details of the members of the Complaints Committee.

Please refer to the Annexure for the Complaints Committee Constitution.

ii. **Disqualification of Membership**

- An Employee Member shall cease to hold office as a member of the Complaints Committee if she/he ceases to be an employee of the Company. Further, a Member shall be disqualified from acting as a Member if she/he is found guilty of committing an act of Sexual Harassment or any other act of moral turpitude. In the event of any disqualification, resignation, or termination of appointment (by the Company) of any Member, the Company shall, with respect to an outgoing Employee Member, forthwith notify a substitute Employee Member and shall, with respect to the Independent Member, make best efforts to find a substitute member as quickly as possible.

The Members are prohibited from publishing or making known contents of complaint and inquiry proceedings as required; or if convicted for an offence or an inquiry into an offence under any law for time being in force is pending against him/her; or has so abused his/her position as to tender his/her continuance in office prejudicial to the public interest and such Member shall be subject to penalties and legal action.

- Notwithstanding the aforesaid, the Company shall be entitled, at its sole discretion and at any time, to terminate the appointment of any Member (as Member of the Complaints Committee) and appoint a substitute thereof.

iii. **Term**

- The term of membership to the Complaints Committee shall be for three (3) years from the date of appointment of the relevant member. However, the Company may temporarily extend the term of any Member of the Complaints Committee in order to dispose of any pending complaint or may add new members if any of the Members leave the organization.

iv. **Chairperson of the Complaints Committee**

- The Chairperson of the Complaints Committee shall be one of the women employed at a senior level at workplace and shall be nominated by the Members of the Complaints Committee at its first meeting or so appointed by the Company.

v. **Functions of the Complaints Committee**

- The Complaints Committee shall have the following responsibilities:
  - a. Implementation of this Policy;
  - b. Conducting inquiries in accordance with the procedures set out further below, and ensuring compliance with the Policy in all actions taken under, or in connection with, this Policy;
  - c. Organizing workshops or interactive programs to spread awareness of the issue of sexual harassment as well as this Policy amongst the employees of the Company; and
  - d. Keeping a record of all complaints received and the actions taken by the Committee and the Company thereon.

vi. **Report**

- The Complaints Committee shall, at the end of each calendar year, prepare a consolidated report of all the complaints relating to Sexual Harassment received and the actions taken by the Company thereon and shall submit the same to the

concerned government department (with a copy to the management of the Company).

vii. **Meetings and Functioning of the Complaints Committee**

- Subject to the procedure relating to specific complaints of Sexual Harassment the Complaints Committee shall meet at least once in a year at the place (in the Company's premises or offices) and time as notified by the Chairperson. In the event of the Chairperson being absent in any meeting, the members shall appoint another member to be the Chairperson for that meeting. The minimum quorum required for the Complaints Committee to commence their meeting will be at least Two (2) Members including the independent member and with not be less than half the Members present at such meeting being women. In the event of the number of Members present and/or women Members present at any meeting is less than aforesaid, the Complaints Committee shall not discuss any matters or take any actions/ decisions save and except for electing the substitute Chairperson in case the Chairperson is absent and such meeting shall be adjourned to the following day or such other day as the Chairperson/ substitute Chairperson shall specify.
- In the event that the aforesaid number of Members present is still less than as stated above at any meeting, adjourned from a previous day, the Chairperson shall notify the Company (the Human Resource Department) of the Members absent and the Company shall take steps to forthwith appoint a substitute member in place of the absentee Member and the meeting of the Complaints Committee shall be held on the next day.

viii. **Decisions**

- The decisions of the Complaints Committee shall be decided by the majority vote and in cases of division of votes equally, the Chairperson shall have a casting vote.

ix. For the sake of clarity, for regions other than India; the Counselors and/or Chairperson and/or Committee Members Constitution may be gender neutral depending upon nature of the complaint.

## **5. REDRESSAL PROCEDURES**

### **5.1 BASIC PROCEDURES**

- There are primarily two basic procedures that can be followed with respect to any allegation of Sexual Harassment. i.e., informal and formal. It is specified that the following are not required to be followed in any specific order. However, early informal methods are often effective in correcting questionable behavior.

### **5.2 INFORMAL PROCEDURES**

i. **Consultation**

- Special Counselors are available for consultation by anybody who wants to discuss issues relating to Sexual Harassment, whether or not Sexual Harassment has actually occurred. Consultation is the preferred route for individuals who might

believe that her or his own actions may be the subject of criticism (even if unwarranted). In the event that any individual wants to clarify portions relating to this Policy, she/he is directed to the Human Resources Department.

ii. Direct Communication

- An individual may act on concerns about Sexual Harassment by directly addressing the other party in person or writing a letter/email describing the unwelcome behavior and its effect and clearly stating that such behavior must stop. The Special Counselor can be consulted by the individual before writing the letter/email, and likewise is available for consultation by the person who receives such a letter. **Reprisals against an individual who in good faith initiates such a communication will be considered in direct violation of this Policy.**

### 5.3 FORMAL PROCEDURES

- Any individual who wishes to make a formal complaint alleging an act of Sexual Harassment, would have to make a formal complaint to the Complaints Committee in the manner described below. The procedure of redressal of such a complaint is also provided below.

i. Initiation of Complaint

- Any Employee who has experienced or has been subjected to any act of Sexual Harassment by another Employee or a third party (the "Complainant") shall be entitled to lodge a complaint with the members of the Complaints Committee through e-mail, to ..... registered and ordinary mail, courier, personal appearance or written complaint handed to the Chairperson or any Member of the Complaints Committee.

The complaint shall be lodged promptly and within Three (3) months of the occurrence of the alleged act of Sexual Harassment. In case of a series of incidents, the complaint shall be lodged within a period of 3 months from the date of last incident. Time period for reporting incidents may extend for a period of 3 months, for reasons to be recorded in writing and the circumstances which prevented the aggrieved employee from reporting the incident within the said period.

Nothing contained herein shall however restrict the Complaints Committee from accepting complaints beyond the aforesaid period of Three (3) months if reasons so exist which the Complaints Committee shall record in writing.

ii. Processing of Complaint

Every complaint received by any Member of the Complaints Committee shall be forwarded to all the other Members within 2 (two) days of its receipt. **The complaint shall be kept in the strictest of confidence at this stage.** The Chairperson shall then proceed to call a special meeting of the Complaints Committee within Five (5) days. The Complainant or his/ her representative shall be heard at this meeting and the Complaints Committee shall record the facts based on such hearing. If the Complaints Committee is satisfied that there does not exist any prima facie case of Sexual Harassment, it shall after recording its reasons in writing dismiss the complaint.

- In the event the Complaints Committee finds a prima facie case of Sexual Harassment allegedly committed by one or more Employees (the "Accused"), it shall after recording its reasons in writing conduct an enquiry.



iii. **Enquiry Procedure**

- The Complaints Committee shall invest the complaint and provide its report as quickly as possible and in accordance with the timelines set out below in this Policy. The Presiding Officer shall preside over the investigation and shall document all proceedings of the Complaints Committee.
- The Complaints Committee shall follow principles of natural justice in all its proceedings and shall as far as possible maintain confidentiality of the identity of the Complainant, the Accused and the witnesses
- Where the Accused is subject to any applicable standing orders of the Company, the proceedings of the Complaints Committee shall be conducted, as far as practically possible, in accordance with such standing orders, and to the extent provided therein.
- A copy of the complaint as recorded by the Complaints Committee shall be given to the Accused as well as the Complainant within Two (2) days of recording of the same. The Accused shall be required to submit her/his response to the complaint as well as to indicate whether the Accused wishes to examine any witnesses or furnish any evidence. The Complainant shall also be required to indicate in writing whether the Complainant wishes to examine any witnesses or furnish any additional evidence. The responses of the Complainant and the Accused as aforesaid shall be submitted to the Complaints Committee in writing Two (2) days after the date of issue of the complaint by the Complaints Committee.
- Upon receipt of the responses from the Accused and the Complainant, the Complaints Committee shall conduct a hearing where both the Complainant and the Accused shall be heard in person on the date falling Four (4) days after the date of issue of the communication of the complaint to the Accused. The Complaints Committee shall notify both the Accused and Complainant (as well as the witnesses, if any) of the time and venue of the hearing. The Complainant and the Accused shall also have the right to lead evidence and to cross-examine witnesses.
- In the event the Accused is not present in person at a hearing of the Complaints Committee the hearing shall be adjourned to a date not later than Three (3) days from the date of the original hearing. The hearing shall be conducted on such adjourned date irrespective of whether the Accused is present or not. Provided that nothing contained herein shall preclude the Complaints Committee from adjourning such hearing for a longer period subject to recording its reasons for such adjournment.
- All Employees shall extend fullest co-operation to the Complaints Committee and any failure to co-operate, or the giving of wrong or misleading information, or withholding information shall be a violation of this Policy and shall be dealt with appropriately by the Company.
- Even after the investigation has been completed and corrective action taken, those individuals who believe that their legal rights have been violated shall within a period of 90 days have the option and choice to report violations to law enforcement authorities, preferably after consulting Managing Director and the external member who is a part of the committee.

iv. **Report**

- Within Three (3) days of completion of the hearing, the Complaints Committee shall prepare its report (the "Report"), which Report shall include a summary of the proceedings and the evidence adduced by the parties. All members of the Complaints Committee who were part of the quorum shall sign the said Report.
- The Complaints Committee shall, within Two (2) days of the Report forward copies of the same to the Complainant and the Accused for their comments and further explanations, if any. Such comments or further explanations shall be submitted to the Complaints Committee not later than Three (3) days from the date of the Report.
- The Complaints Committee shall, after on the expiry of the Three (3) day period referred to above, meet to review and evaluate the said Report along with the further explanations/ comments of the Accused and/ or the Complainant, if furnished by them, to ascertain as to whether an offence of Sexual Harassment as complained of, or any other violation of this Policy, has occurred.
- In the event the Complaints Committee concludes from the Report and further explanations (if any) that no offence of Sexual Harassment, nor any violation of this Policy, has occurred (for reasons/ rationale to be recorded in writing thereon) it shall, within Ten (Ten) days from the date of the Report, dismiss the complaint and forward a copy of the Report and its conclusions to the Accused and the Complainant. The original Report and other papers and documents shall be forwarded to the management of the Company.
- In the event that the Complaints Committee concludes from the Report and further explanations (if any) that an offence of Sexual Harassment, or any other violation of this Policy, has been committed or occurred, or that the complaint made by the Complainant is false and based on malafide reasons (for reasons/ rationale to be recorded in writing in each instance thereon) it shall further deliberate on and recommend in writing the disciplinary action(s) to be taken against the Accused or Complainant (as the case may be). The Complaints Committee shall, within Ten (10) days from the date of the Report, forward copies of the Report along with the conclusions and recommendations of the Complaints Committee to the Accused/ Complainant (as the case may be) (with a copy to the management of the Company), directing the Accused/ Complainant (as the case may be) to show cause, within 3 (three) days of receipt of such show cause notice (along with the recommendations), as to why the recommended disciplinary action(s) should not be taken against the Accused/ Complainant by the Company.

v. **Disciplinary Action**

- Within Two (2) days after the expiry of the Three (3) day period referred to immediately above, the Complaints Committee shall meet to review the explanations (if any) furnished by the Accused/ Complainant in response to the said show cause notice, and shall finalize and recommend to the management of the Company, the disciplinary actions (if any) to be taken or imposed in accordance with this Policy and any other applicable policy of the Company in force.
- If an investigation confirms that harassment has occurred, corrective action will be taken, up to and including immediate termination of employment, as appropriate. However, if an investigation of a complaint shows that the complaint or information was false, the individual who provided the false information will be subject to disciplinary action, up to and including termination.

vi. **Implementation**

- The Company shall, not later than Seven (7) days from the receipt of the recommendations of the Complaints Committee, implement the said recommendations.

vii. **Termination**

- The accused is found guilty of sexual harassment which was persistent and which resulted in (or could have resulted in) serious harm to others. The protection of others from further harm and the protection of the integrity of the Company are paramount. The accused be terminated from employment by following the norms and guidelines. In case of a third party being found guilty of such a conduct, the organization would terminate the business relationship. All location leaders are informed about such an action and are warned against taking this employee at another location.

## **6. THIRD PARTY HARASSEMENT**

- 6.1 In case of any complaints of Sexual Harassment committed within the Workplace, by any third party (not being an Employee) the Complaints Committee shall actively assist and provide all its resources to the Complainant in pursuing the complaint and ensuring his/ her safety in the Company premises.

## **7. CONFIDENTIALITY AND PROTECTION AGAINST VICTIMIZATION**

- 7.1 In addition to the specific requirements of confidentiality mentioned elsewhere in this Policy, the Company shall ensure that an Employee who complains to the Complaints Committee or participates in its investigation as a witness or otherwise shall not be subject to any unfavorable treatment whatsoever during the course of her/his employment.
- 7.2 During the course of any investigations by the Complaints Committee the Complaints Committee shall be entitled to recommend to the management of the Company, interim relief(s) for the Complainant (limited to temporary transfers or reallocation of functions of the Complainant and/or the Accused) during the course of the investigation with a view to preventing any continuing/ further Sexual Harassment and/ or to protect the Complainant from any reprisals, which recommendations shall be immediately implemented by the Company.

## **8. SETTLEMENT THROUGH CONCILIATION**

In cases where the aggrieved is a female employee, the Complaints Committee may before initiating inquiry, allows such female employee to request for conciliation in order to settle the matter although a monetary settlement should not be made as a basis of conciliation.

Copies of settlement arrived shall be provided to the aggrieved woman and respondent/accused.

Where settlement is arrived, no further inquiry shall be conducted by the Complaints Committee.

In the event of failure of accused to comply with the terms and conditions of settlement, the Complaints Committee shall proceed to make an inquiry into the complaint or as the case may be, forward the complaint to the police.

The inquiry shall be completed within a period of ninety (90) days.

## **9. ACTION DURING PENDENCY OF INQUIRY**

Where the aggrieved employee is a woman, interim relief of granting leave up to a period of three (3) months in addition to her regular statutory/ contractual leave entitlement during the pendency of inquiry.

## **10. OUTCOME OF INQUIRY / DEDUCTION OF WAGES**

There will be a recommendation by the Complaints Committee in applicable cases, of deduction of salary or wages as deemed proper from the accused and pay to the aggrieved woman employee only.

## **11. DETERMINATION OF COMPENSATION**

Determination of compensation by the Complaints Committee will be on the following grounds:

- (a) The mental trauma, pain, suffering and emotional distress caused to the aggrieved woman
- (b) The loss in the career opportunity due to the incident of sexual harassment
- (c) Medical expenses incurred by the victim for physical or psychiatric treatment
- (d) The income and financial status of the respondent
- (e) Feasibility of such payment in lump sum or in installments

## **12. CONSENSUAL SEXUAL OR ROMANTIC RELATIONSHIPS**

### **12.1. GENERAL**

- There are special risks in any sexual or romantic relationships between individuals in inherently unequal positions, and parties in such a relationship assume those risks. Such relationships would include (but not limited to) those between a supervisor and employee, trainer and trainee, evaluator and evaluatee, adviser and advisee, boss and secretary, and any other relationship between senior level employees and junior level employees. Because of the potential for conflict of interest, exploitation, bias and favouritism, such relationships may undermine the real or perceived integrity of the supervision and evaluation provided. They may also, be less consensual than the individual whose position confers power or authority believes.
- Further, such relationships may harm or injure others in the Company. Relationships in which one party is in a position to review the work or influence the career of the other may provide grounds for complaint by third parties when that relationship gives undue access or advantage, restricts opportunities or creates a perception of these problems. Further, even when both parties have consented at the outset to a romantic or sexual relationship, this past consent does not remove grounds for a charge based upon subsequent questionable and more importantly unwelcome conduct.

### **12.2. PROCEDURE TO BE ADOPTED**

Where such a romantic or sexual relationship (as discussed above) exists, the person in the position of greater authority or power will bear the primary burden of accountability, and must

ensure that she or he does not exercise any supervisory or evaluative function over the other person in the relationship, and must also notify her or his supervisor, head of the Human Resources Department, or the Board of Directors of the Company, so that such higher authority can ensure that alternative supervisory or evaluative arrangements are put in place.

**To clarify, the responsibility for recusal and notification rests with the person in position of greater authority or power. Failure to comply with these requirements is a violation of this Policy and therefore grounds for discipline.**

### **13. MISCELLANEOUS**

- 13.1 The Company shall in consultation with the Complaints Committee periodically review the provisions of this Policy and its implementation (taking into account practical problems, if any, faced by the Complaints Committee and/or the Company in the implementation of this Policy). The Company reserves the right to amend the provisions of this Policy, from time to time, as it deems fit.
  - 13.2 In the event any sexually determined behavior or conduct of an Employee or third party amounts to an offence under the Indian Penal Code, 1860, or any other local law in force, the Company shall, notwithstanding the initiation and continuance of any enquiry or other proceedings under this Policy, render full assistance to the Complainant in making a complaint or initiating any other proceedings with the appropriate authorities.
  - 13.3 On receipt of the consolidated report of the Complaints Committee, at the end of each calendar year, the management of the Company shall submit the same along with its observations and comments on the general compliance and implementation by the Company of this Policy to the concerned government department or any other appropriate statutory authority as the case may be.
  - 13.4 It shall be the duty of the management and the heads of each department or office of the Company to read up and familiarize themselves with the issues of sexual harassment and to conduct training events and workshops to prevent or avoid situations or circumstances, which would be likely to create a hostile or offensive environment.
  - 13.5 The Head of the Human Resources Department may be contacted for any queries or clarifications about this Policy, its implementation and the general rights or remedies of an Employee under this Policy or otherwise.
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#### 14. ANNEXURE

Complaints may be raised by e-mailing: .....

#### INTERNAL COMPLAINTS COMMITTEE CONSTITUTION

Sl. No.	Name of the Member	Current Designation in the Company	Designation in ICC	Contact details
1			Presiding Officer	
2			Member	
3			Member	
*			External Member	

\* Company is under the process of finding suitable person