

Prevention of Sexual Harassment (Anandi) Policy

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100% SAFETY**

Anandi

GENDER = EQUALITY

SEEDWORKS

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PREAMBLE

SeedWorks International Private Limited, is committed to creating and maintaining a community in which its employees can work together in an environment free of violence, harassment, exploitation, intimidation, and stress. This includes all forms of gender violence, sexual harassment, and discrimination on the basis of sex/gender or amongst the same sex members. Every member of the organization should be aware that while the management is committed to the right to freedom of expression and association, it strongly supports gender equality and opposes any form of gender discrimination and violence.

Sexual harassment has come to be widely condemned as a form of human rights violation, and as an infringement on life and liberty as defined by the Constitution of India. Such behavior is seen to transgress common dignity, gender equality, and fundamental rights. Sexual harassment is contrary to anti-discrimination laws of the land. [Article 15: "Prohibition of discrimination on grounds of religion, race, caste, sex or place of birth" and Article 19(1)(g): Right to Freedom which upholds a woman's right "to practice any profession, or to carry on any occupation, trade or business".]

The Supreme Court of India, in a landmark judgment in August, 1997 (Vishaka V. State of Rajasthan) stated that every instance of sexual harassment is a violation of "Fundamental Rights" under Article 14, 15 and 21 of the Constitution of India, and amounts to a violation of the "Right to Freedom" under Article 19 (1)(g). Another Supreme Court judgment in January 1999 (Apparel Export Promotion Council V/s Chopra) has stated that sexually harassing behavior "needs to be eliminated as there is no compromise on such violations". The Supreme Court further reiterated that sexual harassment "is a violation of fundamental right to gender equality and the right to life and liberty. The Supreme Court judgment of 1997 makes it obligatory for every employer and other responsible persons to follow the guidelines laid down by the Court and to evolve a specific policy to combat sexual harassment in the workplace. All commercial establishments are bound by the same directive.

OBJECTIVE

SeedWorks International Private Limited (henceforth referred to as SEEDWORKS) is committed to lawful and ethical conduct of business.

SeedWorks is an equal employment opportunity provider. The Company does not discriminate its employees on the grounds of gender, promotes a work environment that encourages mutual respect, courteous and congenial relationships. SEEDWORKS believes in providing a non-hostile safe working environment without fear of prejudice, gender bias and sexual harassment to all its employees.

All employees of the Company have the right to be treated with dignity and every employee has the right to be protected against harassment. SEEDWORKS holds the responsibility to identify and prevent sexual harassment and to develop a culture of dignity and respect in the day-to-day conduct of its business.

SEEDWORKS will respond promptly to reports of sexual harassment and will take appropriate steps to discipline behavior that violates this and, if necessary, facilitate legal action.

This policy is meant to educate the employees about what conduct constitutes sexual harassment, the ways and means SEEDWORKS adopts to prevent occurrence of any such event, and in the event of such an occurrence, to enable a fair mechanism for dealing with such conduct.

Effective Date

This policy will be in force from 1st April 2017.

SCOPE & RESPONSIBILITIES

What is Sexual Harassment?

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

- a. 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
 - Physical contact and advances/ offensive language
 - Demand or request for sexual favors
 - Sexually colored remarks or/and bawdy humor
 - Showing any pornographic material
 - Any other unwelcome physical, verbal or non-verbal conduct of a sexual nature.
- b. Any unwelcome sexual advances, requests or demand for sexual favors, either explicitly or implicitly, in return for employment, promotion, examination or evaluation of a person towards any company activity.
- c. Any unwelcome sexual advances involving verbal, non-verbal, or physical conduct such as sexually colored remarks, jokes, letters, phone calls, e-mail, SMS, gestures, showing pornography, lurid stares, physical contact or molestation, stalking, sounds, display of pictures, signs, verbal or non-verbal communication which offends the individual's sensibilities and affects her/his performance.
- d. Entry into specific areas earmarked for female employees and students, with the intent to commit mischief and harassment.
- e. Eve teasing, innuendoes and taunts, physical confinement against one's will and intrusion into one's privacy

- f. Act or conduct by a person in authority which creates a hostile environment at the workplace or intimidates the person belonging to the other sex.

Sexual harassment cases can be classified into two categories: –

1. Quid pro quo (meaning this for that):

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

2. Creation of a hostile working environment:

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.

3. This policy mandates that there is a need to disclose the nature of prior as well as existing relationships between the employees. This is in order to achieve a positive and efficient work environment

What is not Sexual Harassment?

Sexual harassment does not refer to normal conversation that all parties affected find acceptable. It does not refer to office relationships that are freely entered without intimidation or coercion.

Who is covered under the Anti- Sexual Harassment Policy?

Anti-Sexual harassment at workplace is applicable to:-

- Every employee across the Company – permanent, temporary, on training and on contract (including those acting as consultants);
- An alleged act of sexual harassment that has occurred during or beyond office hours;
- An alleged act of sexual harassment, which has taken place within or outside the company premises
- All the employees, workers and trainees (whether in the office premises or outside while on assignment).

Where sexual harassment occurs to a SEEDWORKS employee as a result of an act by a third party or outsider while on official duty, SEEDWORKS will take all necessary and reasonable steps to assist the affected person in terms of support, redressal and preventive action.

This policy is only applicable when either or both the alleged harasser and the victim are employees/agents of the company. It is not applicable when both the alleged harasser and the victim are third parties.

DEFINITIONS:

The definition of sexual harassment shall include any harassment caused to female or male employees. It would also include harassment caused to or by either gender.

Basic definitions for reference: -

- 1.1. **Complaint:** Information either oral or written made by the victim against sexual harassment attempted or perpetuated.
- 1.2. **Complainant:** The person reporting an incident of Sexual Harassment.
- 1.3. **Victim:** The person subjected to Sexual Harassment.
- 1.4. **Alleged Harasser:** The person who is alleged or reported to have committed an act of Sexual Harassment.
- 1.5. **Employee:** "Employee" means any person on the rolls of the Company including those on deputation, contract, temporary, part time or working as consultants.
- 1.6. **Day:** Means normal working days of 8 hours, excluding weekly off and national holidays.
- 1.7. **Victimization:** "Victimization" shall be understood to mean any adverse action by an individual, group of individuals or organization against individuals because they have, in good faith, reported instances of sexual harassment, participated in or been witnesses to proceedings to redress an alleged instance of sexual harassment.
- 1.8. **NGO:** "NGO" includes any Non-Governmental Organization registered under the Societies' Registration Act or as a public charitable trust recognized under law. Such a society/charitable trust must not be affiliated to any political party, and should have been engaged in work for gender equality, particularly for the amelioration of the status of women, for a minimum of three years prior to the date of empanelment.

INTERNAL COMPLAINTS COMMITTEE:

In accordance with **The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013** and in line with **Supreme Court Guidelines in Vishakha v. State of Rajasthan W.P.**, and in furtherance to the core commitment to the Constitution, of protecting and nurturing the dignity of the individuals, the Company has formed an "**Internal Complaints Committee**" consisting of Internal Complaints Committee which will manage the process of enquiry and redressal of sexual harassment complaints.

Constitution of Internal Complaints Committee: -

- The Committee shall consist of five (5) members
- At least two members of such a Committee shall be women.
- One member of the committee shall be from a non-governmental organization [“NGO”] that operates on a secular non-profit basis and is involved in work concerning gender justice or a person having expertise in handling issues relating to sexual harassment.
- The Committee shall be headed by one member [“Chairperson”]; who shall mandatorily be a woman.
- One member of the committee mandatorily shall be an employee of the company, holding the position of Director, President or VP, AVP, CEO, CFO.

SEEDWORKS’s Internal Complaints Committee:

S. No.	Name	Role	E mail id	Cell No
1	Ms Madhavi Ganti	External Member	pcsmadhavi@gmail.com	7799300086
2	Ms Smita Jayadevan	Chairperson	smita.jayadevan@seedworks.com	9949770719
3	Ms Jyothirmayee B	Member	jyothirmayee.bhattiprollu@seedworks.com	9949354051
4	Dr Jagdeesha Gouda	Member	jagadeesha.gouda@seedworks.com	9849948443
5	Mr Ghanshyam Singh	Member	Ghanshyam.singh@seedworks.com	9010744497

The committee shall have a permanent email id, for employees to register their grievances, complaints or concerns online via email. The employee may also email the complaint to the Internal Complaints Committee to icc@seedworks.com

The quorum for the purpose of meeting/hearing shall be 2/3rd of the members of the Complaints Committee. However, this shall not be a pre-requisite for the quorum of an adjourned meeting.

Changes in the constitution of the Complaints Committee, whenever necessary, shall be made as expeditiously as possible and in any case within 15 days of the date of vacancy of office by one of the members.

The Complaints Committee shall meet once in two quarters, even if there is no live case, and review preparedness to fulfill all requirements of The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and Vishakha judgment in the Company.

The minutes of every meeting shall be recorded in the Minutes Register maintained for the purpose.

SCOPE, ROLE & RESPONSIBILITIES OF INTERNAL COMPLAINTS COMMITTEE:

- The Committee shall decide whether the facts contained in the complaint, make out a case of “sexual harassment” in light of the definition contained in the Policy.
- The Committee shall look into the truth of the allegations contained in the complaint.
- The Committee shall look into the truth of any allegation of retaliation against / victimization of the complainant or any other person assisting him/ her as a result of such complaint having been made or such assistance having been offered.
- The Committee shall recommend the penalties / action to be taken against any person found guilty of having sexually harassed the complainant, up to and including termination, to the HR Department.
- The Committee shall recommend the penalties / action to be taken against any person found guilty of having retaliated against / victimized the complainant or any other person assisting her as a result of such complaint having been made or such assistance having been offered.
- The Committee shall recommend appropriate psychological, emotional and physical support (counseling, security and other assistance) for the victim, to the HR Department.
- The Committee shall recommend the penalties / action to be taken, up to and including termination, against any person found guilty of having made false claims of having been sexually harassed, to the HR Department.
- The Committee shall monitor the follow-up action to be taken by the HR Department on receipt of the Report of the Committee

Rights and Powers of the Internal Complaints Committee: -

- The Committee shall have the power to summon witnesses and call for documents or any information from any employee.
- If the Committee has reason to believe that an employee is capable of furnishing relevant documents or information, it may direct such person to produce such documents or information by serving a notice in writing on that person, summoning the person, or calling for such documents or information at such place and within such time as may be specified in the written notice.
- Where any relevant document or information is recorded or stored by means of a mechanical, electronic or other device, the Committee shall have the power to direct that the same be produced, or that a clear reproduction in writing of the same be produced.
- Upon production of documents / information called for by it, the Committee shall have the power to make copies of such documents / information or extracts there from; or retain such documents/

information for such period as may be deemed necessary for purposes of the proceedings before it.

- The Committee shall have the power to issue interim directions to / with regard to any person participating in the proceedings before it.
- The Committee shall have the power to recommend the action to be taken against any person found guilty of sexually harassing the complainant; retaliating against / victimizing the complainant or any other person before it; and making false charges of sexual harassment against the accused person.
- Committee shall have powers to take evidence on oath from parties involved in matters/charges presented before it for adjudication.
- Committee shall have powers to order interim relief including powers to suspend the accused till conclusion of proceedings or till such time it deems fit.
- Committee shall have powers to form an investigation team and also have powers to dissolve the investigation team so created for investigation into an accusation of sexual harassment.
- Issue restraining orders against harasser.

COMPLAINT PROCEDURE:

Know your rights: - Sexual harassment is illegal. Both the law of the land and the SEEDWORKS Code of Conduct for its employees prohibits Sexual Harassment.

Talk to the Harasser: - Tell the accused that his / her behaviour is unwelcome and ask him/her to stop. State clearly and firmly that you want a particular behavior to cease. If employees communicate by letter or memo, they must keep a copy. Name the behavior. Whatever he's just done, say it, and be specific. Hold the harasser accountable for his actions. Don't make excuses for him; don't pretend it didn't really happen. Take charge of the encounter and let people know what he did. Privacy protects harassers, but visibility undermines them. If, after asking the accused to stop his / her behavior, the harassment continues, report the abuse to the Internal Complaints Committee formed for this purpose, through a mail to the mail ID of the Committee.

Set your own boundaries: - Say "NO" emphatically and clearly when you are asked to go places, do things, and respond to questions, or engage in situations that make you uncomfortable. Do not worry about offending the other person or hurting his or her ego. Take care of yourself first.

Trust your own instincts about possible danger: - In an uncomfortable situation, be direct and honest, and remove yourself from the situation immediately. Make honest, direct statements. Speak the truth

(No threats, no insults, no obscenities, no appeasing verbal fluff). Be serious, straightforward, and blunt.

Speaking out: - Speaking about sexual harassment is an effective tool in combating it. While speaking about it, the problem becomes visible, it is acknowledged that it exists, and this in turn leads one to take effective measures against it. Speaking about sexual harassment also gives an opportunity to clarify about it. It helps in changing attitudes of people towards this issue. It mobilizes public opinion against it. It makes it difficult for a potential harasser to commit the crime.

Talk to immediate supervisor or manager, HOD: - All Heads of the departments, managers and supervisors have an obligation to provide a work environment free from sexual harassment and to take corrective action. Employees may discuss the situation with their immediate supervisor or with another person in a position of authority. The employee also can register preliminary complains with Internal Complaints Committee either as way of putting a deterrent to the act of harass or for formal mediation or warning to the harasser under this policy.

Get a medical check-up: - If you have been raped or physically assaulted while on duty, report immediately to the Committee. Go for a medical check-up. Obtain a medical report, this is important, should you decide to pursue a legal case.

Any settlement brought about in via Dispute Resolution by Internal Complaints Committee must be mutually acceptable to both, the victim and accused.

Actions to be taken by Internal Complaints Committee:

Where any settlement between the victim and accused is reached, Internal Complaints Committee will record the Dispute Resolution process and the settlement reached. A copy of the same will be furnished to the victim and accused. Any Dispute Resolution carried out by the Internal Complaints Committee shall be completed within a period of 15 working days from the date of the first hearing.

The employee who is a victim shall send an email to the Internal Complaints Committee on icc@seedworks.com by filling up the Annexure SHCF as provided in the policy handbook herewith. The victim or the complainant shall furnish as much information as he/ she can.

All complains of sexual harassment shall be lodged at the earliest point of time and within Seven (7) working days from the occurrence of the alleged incident. Employees who feel they have been harassed

must maintain records of incidents, including dates, times, places, witnesses, responses of the alleged harassed and harasser, and any other relevant information.

What should be avoided: -

- Do not blame yourself. It is a violation of an individual's right to work and live with dignity.
- Do not ignore the incident. The harasser may misinterpret a lack of response as approval of the behavior.
- Do not delay. Delay in action increases the probability that unwanted behavior will continue or escalate.
- Do not hesitate to ask for help. Speaking up may prevent others from being harmed as well.

PROCEDURES TO BE FOLLOWED BY THE INTERNAL COMPLAINTS COMMITTEE: -

- An enquiry and all proceedings and fact finding and related correspondence are to be initiated only through the members of the Internal Complaints Committee or an Investigation Team constituted for this purpose by the Committee.
- No person accused of an act of Sexual Harassment under this policy shall be part of the decision-making process referred to and under this code and policy.
- An official Complaint Register bearing the date of opening of such register shall be maintained by the Committee. All complaints received shall be numbered and entered in the Complaint Register with date of receipt of the Complaint. Complaints sent by registered post bearing, the correct name and address of the complainant shall be received and entered in the register.
- Depending upon the nature of the Complaint, the Internal Complaints Committee may direct that an enquiry be conducted either by the Committee itself, or by an Investigation Team constituted by the Internal Complaints Committee.
- The Internal Complaints Committee may not order an enquiry, if examination of witnesses/documents is not necessary to arrive at a conclusion. In either case, the Internal Complaints Committee shall provide an opportunity to the victim as well as the alleged harasser to represent their position and provide their explanations.
- In the event an enquiry is found to be necessary, then within three days of the complaint being sent by the victim and it being received by the Internal Complaints Committee, the Committee shall issue a formal notice of inquiry to all parties involved and also furnish a notice requesting all parties concerned to submit their written submission within seven working days of having received the notice.

- Within seven (7) working days, all parties involved shall submit their replies to the Internal Complaints Committee. Each party shall be provided with a copy of the written statement(s) submitted by the other, and reasonable time (not exceeding five (5) working days) shall be provided for either parties/party to study the same prior to appearing before the Internal Complaints Committee along with the relevant documents and witnesses to support their case along with the signatures of the concerned parties to certify the documents as original. Within four working days from the receipt of written statements by both parties and submission of relevant documents and witnesses, the Internal Complaints Committee shall send a notice to the concerned parties, calling for an oral hearing. The Chairperson shall issue 7 days' prior notice to all the members and the parties involved intimating the date fixed. On the date fixed for hearing of the Complaint, the Committee shall, by notice, direct the parties to appear before the Committee to present their case. Each Party shall be given a chance to give an account of the sequence of events leading to the request for inquiry before the Internal Complaints Committee.
- The Internal Complaints Committee shall have the power to ask questions which it deems fit to the parties during the oral hearing, which may also include any questions which have been submitted by the other party by way of written statement or through relevant document.
- The Internal Complaints Committee shall permit either party to include, introduce, and adduce new documents as evidence during the oral hearing.
- After hearing all the parties concerned, and upon perusal of documentary evidence (if any) and all the documents which have been filed by the parties the Committee may terminate the proceedings if it is of the opinion that no prima facie case exists. The Committee may call upon any or all or additional witnesses and ask them any such questions as it may deem fit, which may also include any questions which have been submitted by either party.
- After hearing all the parties concerned and upon perusal of documentary evidence (if any), along with majority members of the Committee present expressing their individual opinion in writing, the Committee shall within one week, submit a report to the Chairman with its factual findings and a observations on whether this Code or policy has been violated.
- The Chairman may refuse to concur with the report and recommendation to dismiss the complaint and may refer the report back to the Committee for re-consideration on the points noted by him on the report.
- The Committee after receipt of its report for reconsideration shall meet and reconsider its report in the light of the note of the Chairman of the Internal Complaints Committee and shall take a decision to either change or maintain its report in the original form and send/ forward the same to the

Chairman for his final decision. The Chairman shall have no discretion but to accept the report forwarded by the Internal Complaints Committee after reconsideration and shall pass the final order following the report and recommendation of the Committee. In case of difference of opinion amongst the members, the opinion of the majority shall prevail.

- On the basis of the report of the Internal Complaints Committee, the disciplinary proceeding for misconduct of sexual harassment shall be drawn up/ initiated against the delinquent employee. The disciplinary proceeding against the delinquent employee shall be concluded within 45 days from the date of report and disciplinary proceeding being so initiated against the delinquent employee.
- The entire process of inquiry till submission and acceptance of report shall be concluded within a maximum period of three months or 90 days from the date of the complaint officially being registered with the Internal Complaints Committee.

POSSIBLE DISCIPLINARY ACTIONS ARISING OUT OF THE RECOMMENDATIONS:

- A letter of warning that will be placed in the personal dossier of the harasser.
- Immediate transfer or suspension without pay or both.
- Fine equivalent to 2-4 months' salary that can be credited to a fund created to be utilized for the welfare of the employees.
- Stoppage of increment with or without cumulative effect.
- Reduction in rank.
- Curtailment of privileges.
- Fine up to twenty thousand rupees (Rs 20000/-), towards employee welfare fund or other social causes via any renowned NGO.
- Termination/dismissal from the services of the Company.
- Any other action that the Disciplinary Authority may deem fit
- Filing a complaint by the Harassed employee before the relevant police station/Court.
- Mandatory attendance in a sexual harassment workshop or counseling program.

APPEAL:

- i. The complainant and the defendant shall have the right to appeal if they are dissatisfied with the decision of the committee.

- ii. An appeal shall lie before the following:
 - (a) An appeal against a decision of Committee shall be heard by an apex body which may be constituted as a when required with an external woman expert as chairperson and two members of Committee.

REDRESSAL:

- i. Committee can ask for the suspension/ transfer of the alleged harasser from his official position, during the pendency of the enquiry if his presence is likely to interfere with the enquiry.
- ii. The victim of sexual harassment will have the option to seek transfer of the perpetrator or their own transfer where applicable.
- iii. The Head of the institution upon receipt of the enquiry report shall refer the same to the Board or any other appropriate body and institute disciplinary action on the basis of the recommendations of the concerned Committee against Sexual Harassment.
- iv. The disciplinary action will commensurate with the nature and impact of the sexual harassment.

DISQUALIFICATIONS:

Disqualification of Chairperson and Members:

A person shall be disqualified for being appointed, elected, nominated or designated as, or for being continued as, a member of Internal Complaints Committee if there is any complaints concerning sexual harassment pending against her/him, or if she/he has been found guilty of sexual harassment/serious misconduct.

The tenure of the members of the committee shall be ordinarily for two years from the date of nomination.

Disqualification of an NGO:

A person shall be disqualified from being appointed, elected, nominated or designated as, or from being continued as an NGO representative on the Internal Complaints Committee if such appointment, nomination, designation election or continuation is inconsistent with the provisions of this code and policy and as per the definition of NGO under this Code and policy.

The tenure of the members of the committee shall be ordinarily for two years from the date of nomination.

Where the accused is a person who is senior to the Chairman under hierarchy of the establishment, then for that particular case, the chairperson shall be substituted on the Committee by another person senior in rank and status to the accused. Such an ad-hoc appointment shall be made by the SEEDWORKS COO or a person above his rank only.

ACTION AGAINST FALSE AND FRIVOLOUS COMPLAINT

If, on investigation, it is revealed that the complaint was made with a 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.

In the event that the formal request for inquiry is proved to be malafide, Internal Complaints Committee shall recommend to the Chairman that the person found guilty of such a malafide and fraudulent act be required to issue a written public apology to the person who has been so falsely accused of sexual harassment, which is to be displayed prominently on all notice boards in the Company.

Insufficient evidence to support a complaint does not necessarily mean that the charge was intentionally false. Material, circumstantial and factual evidence needs to be produced which could prove the complaint made was with malicious intent.

Possible disciplinary actions for filing complaints with malicious intent:

- A letter of warning that will be placed in the personal dossier of the harasser.
- Immediate transfer or suspension without pay or both.
- Fine equivalent to 2-4 months' salary that can be credited to a fund created to be utilized for the welfare of the employees.
- Stoppage of increment with or without cumulative effect.
- Reduction in rank.
- Curtailment of privileges.
- Fine up to twenty thousand rupees (Rs 20,000), towards employee welfare fund or other social causes via any renowned NGO.
- Termination/dismissal from the services of the Company.
- Any other action that the disciplinary authority may deem fit
- Filing a complaint before the relevant police station/court.

The intent of this policy is to create a harmonious and safe working environment. To ensure that this is upheld in both letter and spirit, we urge SEEDWORKS employees to desist from lodging wrongful allegations. This would apply to third parties also.

DOs & DONTs:

- Employees of SEEDWORKS India should abstain from committing any acts which amount to sexual harassment at the workplace and are encouraged to report incidents of sexual harassment without fear or favor.
- Head of departments, Managers, Supervisors are required to create appropriate working conditions in respect of work, leisure, health and ensure there is no hostile environment in the workplace.
- Head of departments, Managers, Supervisors are required to report any complaint or grievance immediately to the Internal Complaints Committee.
- It is both the duty and obligation of the HR department to provide necessary communication and training across the company, with respect to the anti-sexual harassment policy.
- Human Resource shall ensure this policy is communicated, explained and handed over at the time of induction of every employee.
- Human Resource in consultation with the Internal Complaints Committee, clarifies to employees on any queries related to this policy wherever required.
- Human Resource shall ensure implementation of this policy in line with overall Internal Complaints Committee guidelines and directions. Human resources shall provide appropriate training to employees on gender sensitivity and ensure that this policy and code is communicated, explained and handed over at the time of induction of every employee.
- Management and supervisory personnel must be sensitive to acts of conduct which may be considered offensive by fellow personnel and must refrain from engaging in such conduct.
- It is the duty of the Internal Complaints Committee Head of departments, Managers, Supervisors and Human Resource Department, to ensure that there is no retaliation or retribution happening against the victim, witnesses or accused at the workplace, where the supposed action is to have taken place.

REVIEW & REVISION:

This Policy shall be reviewed at least once in two years.

ANNEXURE - SHCF

SEXUAL HARASSMENT INCIDENT REPORT-CUM-COMPLAINT FORM

Name of the Complainant:	Department:
Phone Number:	E-mail:
Date of filing complaint:	Place of residence:
Name of the Accused:	Department:
Relationship of the Accused to the Complainant (manager, co-worker, client, etc.):	Phone Number:
E-mail:	Place of residence:
Date of Incident: <i>(If more than one event, please report each event on a separate form.)</i>	
Where did the specific event occur? Please explain the events that occurred.	
How did you react to the situation? Did you take any action to stop perceived inappropriate behavior?	



Describe the harm you have suffered as a result of the event.



Were there any witnesses to this specific event? (If yes, please provide their names.)



Is there any physical evidence that supports your complaint? If so, please describe or attach copy of evidence.



What would be your desired outcome of the investigation?



The information provided in this complaint is true and correct to the best of my knowledge. I am willing to cooperate fully in the investigation of my complaint and provide whatever evidence the Employer (Company) deems relevant.



Signature :

Date:



Place: