

POLICY ON PREVENTION OF SEXUAL HARASSMENT AT WORKPLACE

I. COMMITMENT:

Our Company is committed to providing work environment that ensures every employee is treated with dignity and respect and affords equitable treatment. The Company is also committed to promoting a work environment that is conducive to the professional growth of its employees and encourages equality of opportunity. The Company will not tolerate any form of sexual harassment and is committed to take all necessary steps to ensure that its employees are not subjected to any form of harassment.

II. SCOPE:

This policy applies to all categories of employees of the Company, including permanent management and workmen, temporaries, trainees and employees on contract at their workplace or at the company's stores or at client sites. In the event of a sexual harassment allegation against a contract worker, the Company will work with the employer of the alleged offender to decide how the matter should be handled. This policy is applicable not only on Company's premises, but also in situations where persons covered by this policy have opportunities to interact on a work-related basis such as while travelling, in off-site events or other third-party premises. Any form of sexual harassment engaged in by the Company's employees, clients, vendors, or other business associates in the Company's premises or during the course of the employee's employment for the Company, shall not be tolerated.

The workplace includes:

1. All offices or other premises where the Company's business is conducted.
2. All company-related activities performed at any other site away from the Company's premises.
3. Any social, business or other functions where the conduct or comments may have an adverse impact on the workplace or workplace relations.

4. Tour buses/cabs/any vehicles of the company, hotels, airports, client sites, remote travel, and virtual platforms (e.g., booking apps or video calls). (Any place visited during employment)

III. DEFINITION OF SEXUAL HARASSMENT:

Sexual harassment may be one or a series of incidents involving unsolicited and unwelcome sexual advances, requests for sexual favors, or any other verbal or physical conduct of sexual nature.

Sexual Harassment at the workplace includes:

1. unwelcome sexual advances (verbal, nonverbal, written or physical),
2. demand or request for sexual favors,
3. any other type of sexually oriented conduct,
4. verbal abuse or 'joking' that is sex-oriented,
5. Making sexually colored remarks, jokes, letters, phone calls, e-mails, gestures, lurid stares, physical contact, molestation, stalking, sounds, display of pictures, signs, verbal or non-verbal communication which offends the individual's sensibilities and affects the individual's performance; or
6. Showing pornography; or
7. any conduct that has the purpose or the effect of interfering with an individual's work performance or creating an intimidating, hostile or offensive work environment and/or submission to such conduct is either an explicit or implicit term or condition of employment and /or submission or rejection of the conduct is used as a basis for making employment-related decisions.

The following circumstances, among other circumstances, if it occurs or is present in relation to or connected with any act or behavior of sexual harassment may amount to sexual harassment:

1. Implied or explicit promise of preferential treatment in employment; or
2. Implied or explicit threat of detrimental treatment in employment; or
3. Implied or explicit threat about present or future employment status; or
4. Interference with work or creating intimidating or offensive or hostile working environment;

or

5. Humiliating treatment likely to affect health or safety.

It is unlawful for males to sexually harass females or other males, and for females to sexually harass males or other females. Sexual harassment in the workplace is prohibited whether it involves co-worker harassment, harassment by a manager, applicants for employment, contract workers, contractors, customers, vendors or any person doing business with or for the Company.

IV. RESPONSIBILITIES REGARDING SEXUAL HARASSMENT:

All employees of the Company have a personal responsibility to ensure that their behavior is not contrary to this policy.

All employees are encouraged to reinforce the maintenance of a work environment free from sexual harassment.

V. COMPLAINT MECHANISM:

An appropriate complaint mechanism in the form of "Internal Committee" (IC) has been created in the Company for time-bound redressal of the complaint made by the victim.

VI. INTERNAL COMMITTEE:

The Company has instituted an Internal Committee for redressal of sexual harassment complaint (made by the victim) across its offices and for ensuring time bound treatment of such complaints. Initially, and till further notice, the IC will comprise of the following four members out of which at least two members will be of the same gender as that of the complainant:

1. Ms. Suguna GW – External Committee Member
2. Mrs Dhanalakshmi K - Presiding Officer
3. Mrs Sindhu S – Member
4. Mr. Ragesh Kanavalkadan - Member

The Committee is responsible for:

- Investigating every formal written complaint of sexual harassment
- Taking appropriate remedial measures to respond to any substantiated allegations of sexual harassment
- Discouraging and preventing employment-related sexual harassment

VII. PROCEDURES FOR RESOLUTION, SETTLEMENT OR PROSECUTION OF ACTS OF SEXUAL HARASSMENT:

The Company is committed to providing a supportive environment to resolve concerns of sexual harassment as under:

A. Informal Resolution Options

When an incident of sexual harassment occurs, the Aggrieved person / the victim of such conduct can communicate their disapproval and objections immediately to the Respondent / harasser and request the respondent/ harasser to behave decently.

If the harassment does not stop or if Aggrieved person/ the victim is not comfortable with addressing the Respondent/ the harasser directly, the Aggrieved person / the victim can bring their concern to the attention of the Committee for redressal of their grievances. The Committee will thereafter provide advice or extend support as requested and will undertake prompt investigation to resolve the matter.

B. Complaints:

1. An employee with a harassment concern, who is not comfortable with the informal resolution options or has exhausted such options, may make a formal complaint to the Presiding Officer of the Committee constituted by the Management. The complaint shall have to be in writing and can be in form of a letter, preferably within 15 days from the date of occurrence of the alleged incident, sent in a sealed envelope. Alternately, the employee can send complaint through an email. The employee is required to disclose their name, department, division and location they are working in, to enable the Presiding Officer to contact them and take the matter forward.

2. The Presiding Officer of the Committee will proceed to determine whether the allegations (assuming them to be true only for the purpose of this determination) made in the complaint fall under the purview of Sexual Harassment, preferably within 30 days from receipt of the complaint.

In the event, the allegation does not fall under the purview of Sexual Harassment or the allegation does not constitute an offence of Sexual Harassment, the Presiding Officer will record this finding with reasons and communicate the same to the complainant.

3. If the Presiding Officer of the Committee determines that the allegations constitute an act of sexual harassment, she will proceed to investigate the allegation with the assistance of the Committee.
4. Where such conduct, on the part of the accused, amounts to a specific offence under the law, the Company shall initiate appropriate action in accordance with law by making a complaint with the appropriate authority.
5. The Committee shall conduct such investigations in a timely manner and shall submit a written report containing the findings and recommendations to the Managing Director of the Company and as soon as practically possible and in any case, not later than 90 days from the date of receipt of the complaint. The Managing Director of the company will ensure corrective action on the recommendations of the Committee and keep the complainant informed of the same.

Corrective action may include any of the following:

- a. Formal apology
- b. no monetary settlement shall be made as a basis of conciliation.
- c. Counseling
- d. Written warning to the perpetrator and a copy of it maintained in the employee's file.
- e. Change of work assignment / transfer for either the perpetrator or the victim.
- f. Restrain the respondent from reporting on the work performance of the complainant or writing the complainant's appraisal/confidential report(s).
- g. Suspension or termination of services of the employee found guilty of the offence

The Internal Committee may also recommend the Company to suspend the respondent or grant leave to the respondent, during the pendency of the inquiry if the circumstances so merit.

Internal Committee's recommendations:

a. During the inquiry proceeding, if the respondent is found guilty of sexual harassment, depending on the severity of the offence, the Internal Committee may make any of the following recommendations to the Head of HR Operations which may include, and not be limited to

- transfer of the respondent;
- direct the respondent to undergo training or counselling to address any specific issues;
- direct the respondent to provide a written apology to the complainant clearly indicating that such behavior will not be repeated and that no retaliatory steps will be taken by her/him or others on her/his behalf against the complainant;
- give a verbal or written warning which will also be noted in the respondents employment record;
- withhold increment or bonus (whether in full or part);
- withhold promotion;
- direct termination or suspension of employment of the respondent;
- any of the other appropriate disciplinary action.

b. The management shall provide all necessary assistance for the purpose of ensuring full, effective and speedy implementation of this policy.

c. Where sexual harassment occurs as a result of an act or omission by any third party or outsider, the Company shall take all steps necessary and reasonable to assist the affected person in terms of support and preventive action.

d. If the complainant desires to take criminal action against the respondent, there shall be no objection by the Internal Committee and the Company. In such an event, the Company will attempt to provide all reasonable assistance to the complainant.

6. In case the complaint is found to be false, the Complainant shall, if deemed fit, be liable for appropriate disciplinary action by the Management, including suspension or termination of work.

VIII. CONFIDENTIALITY:

The Company understands that it is difficult for the victim to come forward with a complaint of sexual harassment and recognizes the victim's interest in keeping the matter confidential. To protect the interests of the victim, the accused person and others who may report incidents of sexual harassment, confidentiality will be maintained throughout the investigatory process to the extent practicable and appropriate under the circumstances.

IX. ACCESS TO REPORTS AND DOCUMENTS:

All records of complaints, including contents of meetings, results of investigations and other relevant material will be kept confidential by the Company except where disclosure is required under disciplinary or other remedial processes.

X. PROTECTION TO COMPLAINANT / VICTIM:

The Company is committed to ensuring that no employee who brings forward a harassment concern is subject to any form of reprisal. Any reprisal will be subject to disciplinary action. The Company will ensure that the victim or witnesses are not victimized or discriminated against while dealing with complaints of sexual harassment.

However, anyone who abuses the procedure (for example, by maliciously putting an allegation knowing it to be untrue) will be subject to disciplinary action as in above section VII B 6.



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Retaliation:

The Company prohibits any form of retaliation against anyone who has raised a complaint of sexual harassment or has cooperated in any inquiry involving a complaint of sexual harassment. Any individual who believes that she/he is experiencing retaliation, by way of intimidation, pressure to withdraw the case or threats for reporting, testifying or otherwise participating in the proceedings, should report this to the Internal Committee or HR, and the Company will then address the concerns raised. Any person who is found to be guilty of retaliation may be subject to appropriate disciplinary action including dismissal from service. Anyone who abuses this procedure would also be subject to disciplinary action including dismissal from service.

XI. CONCLUSION:

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