

POLICY AGAINST SEXUAL HARASSMENT AT WORKPLACE

“The aim of this policy is to ensure that sexual harassment does not occur and, where it does occur, to ensure that adequate procedures are readily available to deal with the problem and prevent its recurrence”

1. COMMITMENT:-

Our Company is committed to provide work environment that ensures every employee is treated with dignity and respect and afforded 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.

2. SCOPE:-

This policy applies to all employees (full-time, part-time, trainees and those on contractual assignments) of the Company including all subsidiaries and affiliated companies at their workplace or at client sites. The Company will not tolerate sexual harassment, if engaged in by clients or by suppliers or any other business associates.

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.

3. DEFINITION OF SEXUAL HARASSMENT:

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

Sexual Harassment at the workplace includes:

1. unwelcome sexual advances (verbal, written or physical),
2. demand or request for sexual favours,
3. any other type of sexually-oriented conduct,
4. verbal abuse or 'joking' that is sex-oriented,
5. Unwanted telephone calls or sending/messaging materials of a objectionable nature.
6. 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 decisions.

Inappropriate conduct could also be a joke, a prank or even a compliment. These gestures also lead to harassment although the intention of the individual might not be to offend the other person.

4. INTERNAL COMPLAINT COMMITTEE

A Committee has been constituted by the Management to consider and redress complaints of Sexual Harassment. The Members of the Committee are as follows:-

Sl.no.	Name	Company	Contact Number
i.	Mrs. Shikha Gupta	Frontline Capital Services Limited	9871837243
ii.	Ms. Richa Arora	Frontline Securities Limited	9599236636
iii.	Mr. Guari Shankar Pandey	Frontline Securities Limited	9871396236

A quorum of 3 members is required to be present for the proceedings to take place.

5. REDRESSAL PROCESS:-

- 1) Any employee who feels and is being sexually harassed directly or indirectly may submit a complaint of the alleged incident to any member of the Committee in writing with his/her signature within 10 days of occurrence of incident.
- 2) The Committee will maintain a register to endorse the complaint received by it and keep the contents confidential, if it is so desired, except to use the same for discreet investigation.
- 3) The Committee 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.
- 4) At the first meeting, the Committee members shall hear the Complainant and record her/his allegations. The Complainant can also submit any corroborative material with a documentary proof, oral or written material, etc., to substantiate his / her complaint. If the Complainant does not wish to depose personally due to embarrassment of narration of event, a lady officer for lady employees involved and a male officer for male employees, involved shall meet and record the statement.
- 5) Thereafter, the person against whom complaint is made may be called for a deposition before the Committee and an opportunity will be given to him/her to give an explanation, where after, an "Enquiry" shall be conducted and concluded.
- 6) 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.
- 7) In case the complaint is found to be false, the Complainant shall, if deemed fit, be liable for appropriate disciplinary action by the Management.

6. ENQUIRY PROCESS:-

- 1) The Committee shall immediately proceed with the Enquiry and communicate the same to the Complainant and person against whom complaint is made.
- 2) The Committee shall prepare and hand over the Statement of Allegation to the person against whom 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.
- 3) The Complainant shall be provided with a copy of the written explanation submitted by the person against whom complaint is made.
- 4) 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.
- 5) 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 copies of such documents. Both shall affix his / her signature on the respective documents to certify these to be original copies.
- 6) The Committee shall call upon all witnesses mentioned by both parties.
- 7) The Committee shall provide every reasonable opportunity to the Complainant and to the person against whom complaint is made, for putting forward and defending their respective case.
- 8) The Committee shall complete the "Inquiry" within reasonable period but not beyond three months and communicate its findings and its recommendations for action to the HR Head. The report of the committee shall be treated as an enquiry report on the basis of which an erring employee can be awarded appropriate punishment straightaway.
- 9) The Committee shall be governed by such rules as may be framed by the Supreme Court orders or any other legislation enacted later on.

7. OTHER POINTS TO BE CONSIDERED:-

- 1) The Committee may recommend to the HR Head action which may include transfer or any of the other appropriate disciplinary action.
- 2) The management shall provide all necessary assistance for the purpose of ensuring full, effective and speedy implementation of this policy.
- 3) Where sexual harassment occurs as a result of an act or omission by any third party or outsider, shall take all steps necessary and reasonable to assist the affected person in terms of support and preventive action.
- 4) The Committee shall analyse and put up report on all complaints of this nature at the end of the year for submission to HR Head.

- 5) In case the Committee found the degree of offence coverable under the Indian Penal Code, then this fact shall be mentioned in its report and appropriate action shall be initiated by the Management, for making a Police Complaint.

8. CONCLUSION:-

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

Rakesh K. Jain
Chairman

G.S Pandey
Director