

Prepared (also subject responsible if other)		No.	
Isarar Shaikh & Sanjay Yadav		Revision : 001	
Approved	Date	Reference	
Prabhakar Azad – Head Hr & Administration	30-05-2022	HR Manual	

## **SEXUAL HARASSMENT POLICY**

### **POLICY INTENT:**

The purpose of this Policy is to develop a harmonious and productive working environment from sexual harassment. Maintaining good employer practice, Sheth Group will ensure all allegation of sexual harassment are investigated and dealt with effectively and appropriately.

### **Sexual Harassment Defined :**

This Policy Prohibits “Quid Pro Quo” and “Hostile Environment Sexual Harassment” as defined below :

#### **1. Quid Pro Quo Sexual Harassment :**

Unwelcome Sexual advances, requests for sexual favour, and other verbal and physical conduct of a sexual nature by one in a position of power or influence constitutes “quid pro quo sexual harassment” when;

- Submission by an individual is made either in an explants or implant term or condition of employment, OR
- Submission to or rejection of such conduct is used as the basis for employment decisions affecting that employee.

#### **2. Hostile Environment Sexual Harassment :**

Unwelcome sexual advances, requests for sexual favour, and other verbal and physical conduct of a sexual nature constitute “hostile environment sexual harassment” when such conduct is directed towards an individual because of his or her gender and has the purpose or effect of;

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- Creating an intimidating, hostile, or offensive work environment,
- Unreasonably interfering with another’s work or work performance generally, a single sexual joke, offensive epithet, or request for a date does not constitute hostile environment sexual harassment, however, being subjected to such jokes, epithets or requests repeatedly may constitute hostile environment sexual harassment.

In deciding whether alleged sexual harassing conduct warrants corrective action, all relevant circumstances, including the conduct in which the conduct occurred, will be considered. Facts will be judged on the basis of what is reasonable to persons of ordinary sensitivity and not on the particular sensitivity or reaction of an individual.

**Reporting of Sexual Harassment Allegations :**

Persons who believe they have been victims of sexual harassment should report the incident(s) immediately to **Head HR**. Delay in reporting makes it more difficult to establish the facts of a case and may constitute to the repetition of offensive behavior.

**Confidentiality :**

- The organization will do everything consistent with enforcement of this policy and with the law to protect the privacy of the individuals involved and to ensure that the complainant and the accused one treated fairly.
- Information about individual complaints and their disposition are considered confidential and will be shared only on a “need to know” basis.

**Assurance against Retaliation :**

This sexual harassment policy shall not, however, be used to bring frivolous or malicious complaints against other employees. If a complaint has been made in bad faith, as demonstrated by clear and convincing evidence, disciplinary action may be taken against the person bringing the complaint.

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**Reporting Channels :**

- All employees have a general responsibility to contribute in a positive way to an environment that is free of sexual harassment.
- Leadership Team, however, have additional responsibilities. The leadership team is not only responsible for educating and sensitizing employees in their departments about sexual harassment issues, but they are also directed to take all appropriate steps to prevent and stop sexual harassment in their areas of responsibility.
- Supervisors who are contacted by an individual seeking to file a complaint about sexual harassment in their department or area of responsibility shall assist the complainant in contacting the **Head HR**.

**Procedures for handling complaints of Sexual Harassment :**

- Individuals who believe they are victims of sexual harassment in their work environment are encouraged to respond to the alleged harasser directly, by objecting and by requesting that the unwelcome behavior stop. Individuals may also seek assistance or intervention, short of filing a complaint, from their supervisor.
- An initial discussion between the complainant and the complaint-receiving official will be kept confidential to the extent allowed by law, with no formal written record.
- The complaint-receiving official will explain the options available and will counsel the complainant.
- If the complainant, after an initial reacting with the complaint-receiving official, decides to proceed, the complainant will be requested to provide a written statement describing the complaint.
- Complaints of sexual harassment will receive prompt attention.

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Complaints may be resolved through the informal or formal procedures described below, and appropriate action will be taken. Informal means are encouraged as the beginning point, but the choice of where to begin formally rests with the complainant. However, if the complaint-receiving official believes that the matter is sufficiently grave because it seems to be part of a persistent pattern, or because of the nature of the alleged offense, or because the complainant seeks to have a sanction imposed, then the complaint-receiving official will initiate a formal procedure, or take other appropriate action.

**1. Informal Procedures :**

- The complainant may attempt to resolve the matter directly with the alleged offender and report back to the complaint-receiving official.
- The complaint-receiving official may notify the alleged offender of the complaint, paying appropriate attention to the need to maintain confidentiality. The complaint-receiving official may take whatever steps short of formal sanctions that he or she deems appropriate to affect an informal resolution acceptable to both parties.
- If a complaint is resolved informally, no record of the complaint will be entered in the alleged offender personnel file or records. However, the complaint receiving official will, in the form of a confidential file recommendation, record the fact of the complaint and the resolution achieved.
- A copy of this memorandum will be forwarded to the Head – Human Resources and it will be retained in confidential files.

**2. Formal Procedures :**

In formal resolution procedures, the written and signed complaint as well as offence resolution copy shall be directed to the Head – Human Resources post appropriate auctioning.

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**Disciplinary Sanctions :**

A conclusion that sexual harassment has occurred shall subject to the offender to appropriate disciplinary action and may result in suspension, discharge, expulsion or dismissal. Sanctions imposed will be determined on the basis of the facts of each case and the extent of harm.

In view of the Sexual Harassment Act & the Directions, we have formed a committee at our workplace that will be taking care of the issues/matters pertaining to the harassment of women employees and accordingly following persons are hereby appointed as members of the said Committee.

No	Name	Designation	Phone Number
1	Ms. Pragathi Malle	Presiding Officer	9833434350
2	Mr. Isarar Shaikh	Member – HR	8879619079
3	Ms. Anbarasi Ramchandran	Member- Liaisoning	9820347370
4	Ms. Mrunalini Gosavi	Member - Contracts	9823769203
5	Ms. Purnima Panchal	Member - CRM	9870114322