

PREVENTION OF SEXUAL HARASSMENT POLICY

OBJECTIVE

Company is committed to create a healthy working environment that enables employees to work without fear of prejudice, gender bias and sexual harassment.

Company regards sexual harassment and actions that create a hostile work environment as a very serious matter and such conduct is prohibited in the workplace by any person and in any form. Company also believes that all employees of the Company have to be treated with dignity.

SCOPE AND EFFECTIVE DATE

- Extends to all employees of the Company and is deemed to be incorporated in the service conditions of all employees and comes into effect immediately.
- Applicable at all locations and activities including those run in partnership so also to all company-sponsored social events.
- Applies to men and women; to like and opposite gender relationships; to relationships between supervisors and subordinates; doctors and patients; and peer relationships. It includes employees, customers, vendors, consultants, and anyone else doing business on our premises, as well as to those involved in activities in which our name is associated.
- All associates shall comply with this policy.

DEFINITIONS

Employee includes a person employed / engaged by the company for any work directly, or by or through any Agency.

Sexual Harassment includes any unwanted or unwarranted gesture or verbal sexual advances, sexually explicit and derogatory statements or remarks, sexually colored remarks, avoidable and unwarranted physical contacts, willfully touching or patting, suggestive sexual remarks, sexually slanted and obscene jokes, vulgar comments about physical appearance, indecent invitations, stalking sounds, lurid stares, use/ showing of pornographic material, display of pictures, demand for sexual favours, demanding sexual favour by making telephone calls or sending SMS/Mails, threats of physical assault or molestation on refusal by the employee by their superiors, colleagues or anyone who for

the time being is in a position to sexually exploit or harass the employee at any work place which may contain :

- Implied or overt promise of preferential treatment in that employee's employment
- An implied or overt threat of detrimental treatment in that employee's employment or an implied or overt threat about the present or future employment status of that employee and includes the creation of a hostile working environment.
- The conduct interferes with an employee's work or creates an intimidating, hostile or offensive work environment.
- Such conduct that is humiliating and may constitute a health and safety problem
- which offends the individual's sensibilities and affect her/his performance;
- conduct of such an act at work place or outside in relation to an Employee, or vice versa during the course of employment;

Complainant In relation to workplace, a woman of any age whether employed or not, who alleges to have been subjected to any act of sexual harassment by the Respondent.

Respondent Employee against whom the complaint has been filed

COMMITTEE AGAINST SEXUAL HARASSMENT (“CASH”)

CASH has been constituted to consider and redress complaints of Sexual Harassment. The committee should be headed by a Woman and Woman members should not be less than half of the total members in the committee who are direct employees of the Company

HR Department shall finalize the Committee members in coordination with respective Head's and shall circulate Committee details to employees in respective locations. The size of the Committee shall not be more than 5 members.

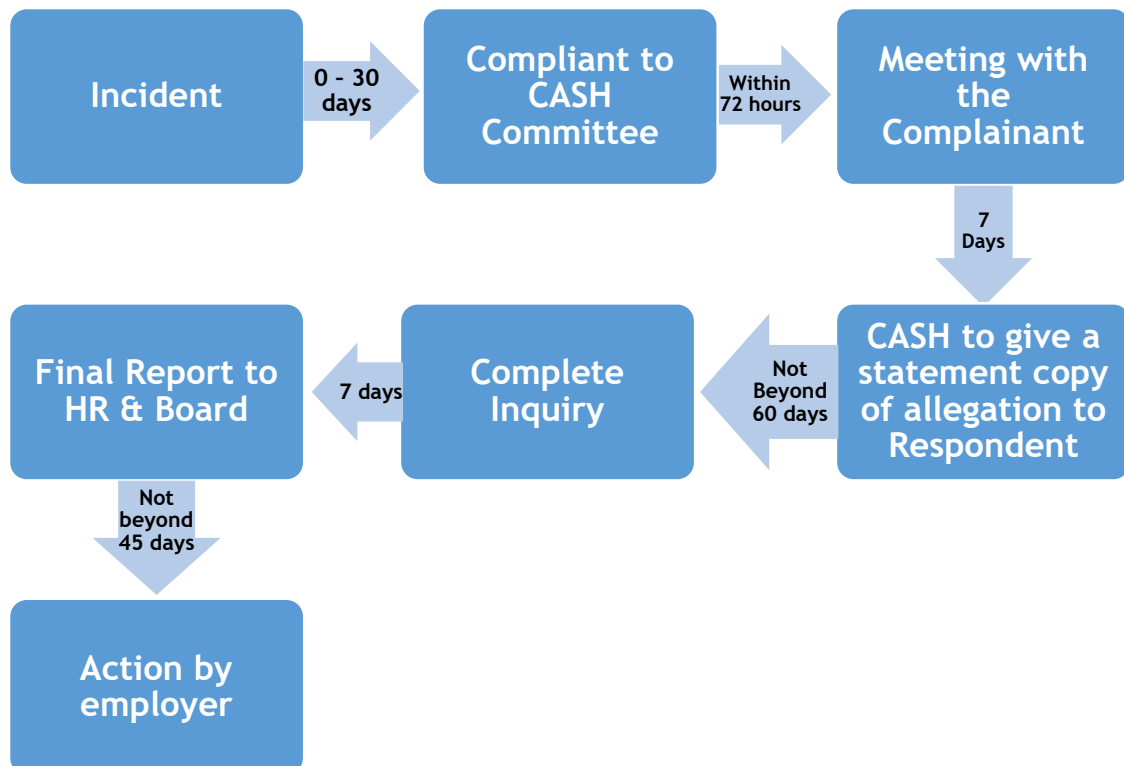
“CASH” MEMBERS		
Ms Priyanka Dalvi	Presiding Officer	priyanka.dalvi@routemobile.com
Ms. Sushma Gedam	Member	anf@routemobile.com
Ms. Joylene Lobo	Member	joylene.lobo@routemobile.com
Mr. Rahul Pandey	Member	rahul@routemobile.com
Mr. Sammy Mamdani	Member	sammy.mamdani@routemobile.com

IF YOU ARE BEING HARASSED

- Tell the harasser his/her behaviour is unwelcome and ask him/her to stop.
- Keep a record of incidents (date, time, locations, possible witnesses, what happened, your response). You do not have to have a record of events in order to file a complaint, but a record can strengthen your case & help you remember details over.

PROCEDURE FOR REPORTING HARASSMENT

- Employee should submit his / her complaint in writing on the occurrence of such an incident at their respective location mentioning the Date and nature of the harassment to cashcommittee@rotemobile.com
- Upon receipt of the formal complaint from the employee, **CASH** Committee will initiate investigation on the veracity / strength of the complaint. Confidentiality will be maintained during the investigation.
- Organization will not tolerate any form of reprisal or retaliation against an employee or applicant reporting any incident of claimed sexual harassment.
- False accusations of harassment will not be tolerated and would be viewed seriously.



ENQUIRY PROCESS

- A quorum of 3 members is required to start the Enquiry process
- If the complaint is raised against a Committee member by the Complainant, the Committee shall ensure that the defendant should not be the part of the Committee and not allowed to be part of the proceedings / interfere in the proceedings.
- **CASH** Committee shall maintain a register to endorse the complaint received. The details are to be recorded and maintained as per Annexure – 1, Annexure-2 of this policy.
- The **CASH** Committee members shall hear the Complainant and record his/her allegations. The Complainant / defendant can submit any corroborative material with a documentary proof, written material, etc., in original which is self-attested to substantiate his / her complaint. If the Complainant (if Female) does not wish to depose personally due to embarrassment of narration of event, a female co-employee shall meet and record the statement.
- Thereafter, the defendant shall 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.
- In case the complaint is proved true, HR Department shall initiate necessary action as recommended by the **CASH** Committee.
- In the event, the complaint does not fall under the purview of Sexual Harassment; the same would be dropped after recording the reasons thereof.
- **CASH** Committee shall complete the “Enquiry” within 60 days from the date of complaint and communicate its findings and its recommendations for action to the HR Department
- Where sexual harassment occurs as a result of an act or omission by any third party or outsider, CASH committee shall take steps necessary and reasonable to assist the affected person in terms of support and preventive action.
- The disciplinary action that shall be commensurate with the nature of the gravity of the offence, shall include but not limited to,
 - Warning
 - Written apology from offender,
 - Bond of good behaviour
 - Transfer
 - Debarring from supervisory duties
 - Denial of employee benefits like increments/promotion/salary correction etc.
 - Cancellation of specific work Assignment
 - Suspension
 - Dismissal

- In case the Committee finds 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.
- Annual report summarizing complaints and Redressal of Sexual harassment shall be prepared by designated person. The said report as well as all documents regarding Sexual Harassment complaints shall be in the custody of designated person and will be termed as '**Strictly Confidential**'.

IMPROPER COMPLAINTS

This policy shall not be used to bring frivolous or malicious complaints against anyone. Making a knowingly false complaint subjects the complainant to disciplinary or corrective action. However, failure to prove a claim of sexual harassment does not constitute proof of a false and / or malicious accusation.

PROHIBITION OF VICTIMISATION

- No person shall be victimized for anything said or done in relation to any complaint.
- A person victimizes another person if the person subjects the other person or threatens to subject the other person to any detriment in connection with employment or recruitment or promotion because such person
 - Has brought proceedings against any person.
 - The other person associates with the complainant.
 - Has given evidence or information or produced a document, in connection with any proceedings.

PREVENTIVE STEPS

CASH Committee shall take all reasonable steps to ensure prevention of sexual harassment at work. Such steps shall include:

- Circulation of the policy in English / Vernacular in Office / Plant / Works locations on Sexual harassment to all direct / indirect employees.
- Sexual harassment will be affirmatively discussed at monthly meetings, workshops etc.,
- Conduct regular in-house training on sexual harassment and addressing complaints to all direct / indirect employees.
- Guidelines will be prominently displayed to create awareness of the rights of female employees.

- A commitment is required from all the levels of the organization for the positive implementation of the policies and procedures made against sexual harassment.
- Widely publicize that the Sexual Harassment is a crime & will not be tolerated.
- Names and contact numbers of members of the CASH committee will be prominently displayed in all the Offices / Projects.

FOLLOW-UP WITH THE COMPLAINANT

Finally, **CASH** Committee shall affirmatively follow up with the complainant after one month of decision to determine

- whether the inappropriate activity has stopped
- whether any retaliatory or related activity has been initiated against the complainant by the defendant
- Depending on the situation, it may also be advisable to interview co-workers or supervisors of the harasser in order to ascertain whether inappropriate activity has continued with respect to the original victim or other parties.

TRAINING

- The HR Team is responsible to ensure adequate training is imparted to all the employees at regular intervals. They can also seek services of external experts wherever needed.
- Regular interactive sessions would be held at periodic intervals involving new employees. These sessions can also be attended by existing employees and would be conducted by representatives of the HR Team.

DO' S AND DON'T

- Do report ALL contraventions of the Code to the appropriate authority.
- Do NOT make frivolous/malicious allegations against a colleague to settle personal scores.
- As far as possible try and gather specific information relating to the alleged fraud/misdemeanour before reporting.
- Do not heed to your intuition or/and rumours. Only report instances where you have specific information. General/false allegations will be counter-productive and you could be implicated.
- When in doubt check with either your supervisor, HR or COMPLIANCE department before taking a step.

**RECEIPT AND ACKNOWLEDGEMENT FOR PREVENTION OF
SEXUAL HARASSMENT POLICY**

I acknowledge that I have received a copy of the Prevention of Sexual Harassment Policy.

I am committed to abide by the policy and to act in a Professional manner that will respect the dignity of Colleagues & Visitors.

(Signature of Employee)

Employee Name: _____

Employee Code: _____

Date: _____

Place: _____

ENQUIRY FORM

To

A complaint of Sexual Harassment (Complaint Number: CASH/xxx) has been lodged against you by Mr. / Ms. _____ on _____.

The complaint refers to the following incidents that allegedly took place between both parties where the details are as following

S. No	Nature of Incident	Date & Time of Incident	Location
1			
2			
3			

CASH Committee is at present examining the complaint(s).

The Committee would like to meet you on _____ (Date) at _____ (Time) in the _____ (mention the venue).

You are requested to attend the Enquiry without fail and meet the Committee to present your version with respect to the Complaint.

If you desire to call any witness(es) the same may be communicated to CASH Committee within 1 day of receiving this communication.

For any change in the time or date of your appointment with the Committee, please contact undersigned.

Yours truly,

Member – CASH Committee

Date:

Encl: Copy of the Complaint along with Proof(s)

ACTION TAKEN FORM

(To be initiated by HR Department)

To

Mr. / Ms. _____

Basing on the complaint lodged by Mr. / Ms. _____ on Sexual Harassment (Pl. refer Form No: CASH/xxxx) and the subsequent detailed enquiry conducted by CASH Committee it has been proved that the allegations are true / False.

Basing on the recommendations of the committee the following disciplinary action is initiated against you

You are requested to abide the decision of the Committee and shall act accordingly.

Yours truly,

Member – CASH Committee

Date:

DECLARATION

I agree to the action recommended by the CASH Committee and shall abide by the same

Date:

ANNEXURE – 1

CASH - COMPLAINT REGISTER

S No	Nature of Complaint	Name & Department of the Complainant	Name & Department of the Defendant	Date & Time of receiving the Complaint	Details of Evidences provided	Enquiry Form Number (CASH/xxx)
1						
2						
3						
4						

ANNEXURE – 2

CASH –ENQUIRY PROCESS DETAILS

S No	Enquiry Form No	Nature of Complaint	Date & Time of Complaint	Remarks	Date of Enquiry	Recommendations by CASH Committee	Action initiated by HR Department
1							
2							
3							
4							