

Policy on Prevention & Redressal of Sexual Harassment at Workplace.

This policy framework is provided to create awareness and impart training to employees on the sexual harassment issues at workplace, identify, prevent, and redress sexual harassment complaints of women employees in the company.

1 Purpose:

- a) To uphold Women's Right to Protection against Sexual Harassment and the Right to Livelihood and towards that end for the prevention and redressal of Sexual Harassment of Women.
- b) To provide a mechanism for the prevention, prohibition and redress of sexual harassment of women at the workplace.
- c) To actively promote a social, physical and psychological environment that will raise awareness about and deter acts of sexual harassment of women.
- d) To comply with the provisions enumerated in the Sexual Harassment of Women at Workplace (Prohibition, Prevention & Redressal) Act 2013.
- e) This policy covers all matters related to prevention, prohibition and redressal of sexual harassment of women employees in the organization.

2 Application

- a) The policy applies to all the employees of **UNIQUE PUNCH SYSTEMS PVT LTD** and includes employees on the contract, trainees and apprentices and any other non-employees at the discretion of the management.
- b) The complaints against outsourced or contract employees will be referred to the internal committee constituted by such contractor or an outsourced agency. If there is no such constitution, the complaint will be referred to police or local committee constituted by the District Commissioner at the option of the aggrieved woman.
- c) All woman employees and any woman who enters the establishment are protected under this policy and complaints of sexual harassment of any woman at the workplace will be taken up for appropriate redressal.

- d) The appropriate method of redressal will be suggested where the Internal committee cannot initiate the enquiry.

3. Definition and Abbreviation

- a) "Sexual Harassment" includes any one or more of the following unwelcome acts or behaviour (whether directly or by implication) namely:-
- ✓ physical contact and advances or
 - ✓ a demand or request for sexual favours or
 - ✓ making sexually coloured remarks or
 - ✓ showing pornography or
 - ✓ any other unwelcome physical, verbal or non-verbal conduct of sexual nature.
- b) The following circumstances, among other circumstances, if it occurs or is present in relation to or connected with any act or behaviour of sexual harassment may amount to sexual harassment:-
- Implied or explicit promise of preferential treatment in her employment or
 - Implied or explicit threat of detrimental treatment in her employment or
 - Implied or explicit threat about her present or future employment status or
 - Interference with her work or creating an intimidating or offensive or hostile work environment for her or humiliating treatment likely to affect her health or safety.

4. Responsibility and Authority

The administration and monitoring of this process are with the Human Resource/Administration Department. The Internal Committee constituted to redress the sexual harassment complaints at the workplace directly reports to the Managing Director of the Company.

5. Policy Instruction and Process Flow

a) Internal Committee

- ✓ The Company has formed Internal Committee which includes a member from a social organization to deal with matters and complaints related to Sexual Harassment which will function on a 3-year term or until a new committee is reconstituted.
- ✓ The details of the Internal committee are as per Annexure I attached to this policy.
- ✓ The Company will extend all the support and assistance to the IC (Internal Committee) in dealing with matters related to Sexual Harassment.

- ✓ The IC will be responsible to enquire into the complaints of sexual harassment and submission of recommendations specifying the actions to the Managing Director on the conclusion of the enquiry.
- ✓ The IC is also responsible to submit an annual report to the Managing Director on the complaints handled by it for the year.
- ✓ The IC shall meet as and when any complaint is received and if there are no complaints it shall meet at least once a year.

b) Complaint on sexual harassment

- a) Any aggrieved female employee may make a complaint of sexual harassment at the workplace to any member of the IC in writing within 3 months from the date of the incident. The IC may extend this time limit if it finds the delay is due to a genuine reason. The IC may at its discretion accept the oral complaint and assist the aggrieved female employee to file the complaint in writing and initiate the enquiry.
- b) The IC shall maintain the complaint register and all complaints are required to be recorded in the complaint register.

c) Enquiry into the complaints by IC

- i. The sexual harassment complaint will be treated as misconduct as per the certified standing orders and rules of the company.
- ii. The IC shall conduct an enquiry into the complaints and follow the enquiry procedure enumerated in the Certified Standing Orders of the Company. IC shall follow the enquiry procedure as enumerated in the Sexual Harassment of Women at Workplace (Prohibition, Prevention & Redressal) Rules 2013 for the employees who do not fall under Certified Standing Orders or where the unit or company is not covered under the Standing Orders provisions of the Industrial Relations Code or any other applicable law.
- iii. The IC may initiate the conciliation between the complainant and the respondent before proceeding on enquiry.
- iv. IC shall follow the principles of Natural Justice during the enquiry process and provide an opportunity of being heard for both the parties and also provide a copy of findings to both the parties.

- v. IC may recommend interim arrangements and reliefs to the complainant as it deems fit.
- vi. In case the complainant wishes to file a police complaint, the IC and the company shall assist the complainant to file the complaint with the police.

d) Penal Consequences

- a. In case the misconduct/sexual harassment complaint is proved against any employee, he will be liable for punishment as detailed in certified standing orders which may include warning, deduction of wages, suspension without pay and also the termination of employment.
- b. The punishment for employees who are not covered under the certified standing orders, the punishment as prescribed in the Sexual Harassment of Women at Workplace (Prohibition, Prevention & Redressal) Rules 2013 will be considered which includes the warning, deduction of wages, suspension without pay and also the termination of employment.
- c. The report and recommendation of the IC will be treated as final and conclusive and no further enquiry is necessary to take action on the respondent.
- d. The Company will take action based on the recommendation by the internal complaint committee on the conclusion of the enquiry and submission of its report.

e) Malicious Complaints

In case a complaint is found to be malicious, it will be treated as misconduct and the complainant/employee will be liable for punishment as explained in clause 5(d).

6. Communication

The following communications are required to be made within the company for better dissemination of information and sensitisation of employees.

- a) The details of this policy are required to be communicated through an awareness program and also to be made available through intranet of the company. The awareness is required to be repeated at least once a year.
- b) The constitution of the Internal Committee and details of the members of the committee is required to be displayed as per the format attached in Annexure-II.

- c) The penal consequences in case of any employee found guilty of sexual harassment of woman at the workplace are required to be displayed separately as per the format attached in Annexure-III.

7. Other Provisions

- d) Any matter or a provision which is not defined or enumerated in this policy document will have the same meaning, force and applicability as detailed in Sexual Harassment of Women at Workplace (Prohibition, Prevention & Redressal) Act 2013 & Rules 2013.
- e) In case of any ambiguity or difference in the interpretation of any provision of this policy, the Head of - Human Resources or the officer specified by the Managing Director is the final authority to interpret the same.
- f) The company may at its discretion review, modify this policy at any time with or without notice.

ANNEXURE - I

MEMBERS OF INTERNAL COMMITTEE- UNIQUE PUNCH SYSTEMS PVT LTD

Serial No	Particulars	Role	Contact Number & Email
1	Lakshmi N	Presiding Officer	9448285489, lakshmi@uniquepunch.in
2	Seema Sandeep	Member	9606488472 seema@uniquepunch.in
3	Prema N Goudar	Member	9448285486 prema@uniquepunch.in
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5	Ambarish H K	Member	8951360475 ambarish@uniquepunch.in
6		External Member	

For UNIQUE PUNCH SYSTEMS PVT LTD



Chandrashekar K
Managing Director
Date: 25/01/2021.