



SURANA TELECOM AND POWER LIMITED

POLICY FOR PREVENTION OF SEXUAL HARASSMENT (POSH)

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1. OBJECTIVE:

Surana Telecom and Power Limited (“the Company” or “STPL”) is committed to creating and maintaining a secure work environment where it’s employees, agents, vendors and partners can work and pursue business together in an atmosphere free of harassment, exploitation and intimidation caused by acts of Sexual Harassment within but not limited to the office premises and other locations directly related to the company’s business.

The objective of this policy is to provide protection against sexual harassment of women at workplace and for the prevention and redressal of complaints of sexual harassment and for matters connected therewith as per the guidelines of “The Sexual harassment of women at workplace (prevention, prohibition & redressal) Act, 2013.

2. SCOPE AND APPLICABILITY:

The Company’s Policy with regard to Prevention, Prohibition and Redressal of Sexual Harassment covers every “employee” across the Company. The Company encourages every employee who believes they are sexually harassed to use the redressal mechanism as provided in this policy. The Policy is with respect to Prevention, Prohibition & Redressal of Sexual Harassment which may arise in places not limited to geographical location viz. Company’s offices / branches but includes all such places or locations where acts are conducted in context of working relationships or whilst fulfilling professional duties or which may be visited by an employee during the course of employment.

The Company’s Prevention of sexual harassment includes sexual harassment by fellow employees, supervisors, managers as well as agents, contractors, customers, vendors, partners and, visitors including outsourced employees. Sexual harassment is judged by the impact on the complainant and not the intent of the Respondent.

Sexual harassment as addressed in this Policy need not necessarily be from a male to a female employee, it can be vice versa as well as between individuals of same gender.

3. DEFINITION:

- a. **“Employee”** means a person employed at a workplace for any work on regular, temporary, ad hoc or daily wages basis, either directly or through an agent, including a contractor, with or, without the knowledge of the principal employer, whether for remuneration or not, or working on a voluntary basis or otherwise, whether the terms of employment are express or implied and includes a co-worker, a contract worker, probationer, trainee, apprentice or called by any other such name;
- b. **“Internal Complaints Committee”** means a committee constituted by Company as per this Policy.
- c. **“Sexual Harassment”** includes harassment of a female/male employee consisting of any unwelcome sexually determined behaviour, whether directly, indirectly, by any male/female in charge of the management or a male/female co-employee either individually or in association with other persons to exploit the sexuality of co-employee to harass him/her in manner which prevents or impairs his/her full utilization of full benefits, facilities or opportunities or any other behaviour which is generally considered to be derogatory .
- d. **“Aggrieved Person”** means a person in relation to work place whether employed or not, who alleges to have been subject to any act of sexual harassment by the Respondent.
- d. **“Respondent”** means a person against whom the aggrieved person has made a complaint.

e. Policy Guidelines:

Sexual Harassment shall include but not limit to:-

- Physical Contact & Sexual advances
- Demand or request for sexual favours;
- Sexually- coloured remarks;
- Showing pornography;
- Any other unwelcome physical, verbal or non-verbal or written conduct of a sexual nature.

4. GRIEVANCE MECHANISM:

A complaint shall be submitted in writing to admn@surana.com or to any member of the Internal Committee within 3 months of occurrence of an act of Sexual Harassment. If the respondent is direct supervisor of the complainant, or person influencing the career growth of the complainant, the reporting structure will be changed till the time the enquiry is completed.

5. INTERNAL COMPLAINTS COMMITTEE:

Each complaint of Sexual Harassment shall be dealt with utmost confidentiality and urgency by an Internal Complaints Committee (“ICC”/ “the Committee”) constituted for this purpose. Internal Complaints Committee has been constituted of the following members as nominated by the Company:

- a. A woman employee employed at a senior level amongst the employees shall act as Presiding officer of the committee if not available then nominated from other office/units/ department/ workplace of the company.
- b. Not less than 2 members from amongst employees preferably committed to the cause of women or who have had experience in social work or have legal knowledge.
- c. One member shall be from amongst NGO/Associations committed to the cause of women or a person familiar with the issues relating to sexual harassment.

At least half the total members of the Committee have to be women. The Presiding Officer and every member of zonal Internal Complaints Committee shall hold office for such period, not exceeding three years, from the date of their nomination as may be specified by the employer.

The Composition of the Internal Complaints Committee shall be as per **Annexure** of this Policy and any change in such composition shall be effected in the policy.

Where the office or administrative units of a workplace are located in different places, division or sub-division, an ICC has to be set up at every administrative unit and office.

6. COMPLAINT REDRESSAL MECHANISM

- a. Each complaint of Sexual Harassment shall be dealt with utmost confidentiality and urgency by an Internal Complaints Committee.
- b. Within 3 working days, the ICC shall commence official internal enquiry by:
 - i. informing the said complaint to the respondent.
 - ii. instructing to stop the alleged act of Sexual Harassment immediately.
 - iii. informing not to reach out to the complainant directly or indirectly.
 - iv. asking an immediate explanation from him/her to the same.
- c. Within 5 working days from the receipt of original complaint, the designated person shall respond in writing to the complainant informing him/her about the initial steps taken by the Company in order to stop the alleged act(s).

- d. Within 15 days from receipt of the original complaint, the Internal committee shall record and accordingly communicate in writing to the complainant and the Respondent, its prima facie findings, upon giving the concerned parties a fair and due opportunity to represent themselves and upon conducting fact finding, truth verification and counseling sessions with persons involved in alleged act(s).
- e. A complaint will be closed no later than one month from receipt of original complaint by recording the decisions of the internal committee, accordingly informing to the complainant and the Respondent of the same.
- f. Employees are duty bound to assist in investigative steps, employees' wholehearted participation shall be mandatory in this regard. Whistleblowers shall be protected from exposure, retaliation or hostility.
- g. Within 2 working days from receipt of prima facie findings or the charges, if the complainant or the Respondent is dissatisfied with the decision of internal committee, she or he may appeal specifying the reasons in writing to Managing Director. Within 5 working days from the receipt, the appeal shall be finally disposed of by written communication to the said party. The decision of Managing Director shall be final and cannot be appealed.

7. REDRESSAL:

- a. An amicable resolution of the complaint is possible only with the written consent of the complainant.
- b. Within 24 hours of closing the case file, the internal committee shall present the same to and inform its decision to the Managing Director.
- c. In case of decision establishing the offence of Sexual Harassment of the complainant, within 3 working days, the internal committee shall recommend Disciplinary action against the offender considering the nature and extent of injury caused to the complainant, prior complaints or repetition of offence etc and the impact of the offence on the company profile as a whole.
- d. The position of the offender and the criticality of the position occupied by the offender shall not be any hindrance to the disciplinary action taken against the offender.
- e. 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 behavior
 - Transfer
 - Debarring from supervisory duties
 - Denial of employee benefits like increments/promotion/salary correction etc.
 - Cancellation of specific work Assignment
 - Suspension
 - Dismissal

8. REPORTING MECHANISM:

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“.

The Annual Report specifying the number of complaints received during the year, if any and their disposal shall be disclosed in the Directors Report section in the Annual Report of the Company in compliance with the provisions of the Act.

ANNEXURE

Composition of Internal Complaints Committee

Sr.No.	Designation	Gender	Membership
1	Manager (Accounts & Finance)	Female	Presiding Officer
2	Manager/ Assistant/ any other employee	Female	Internal Member
3	Manager/Assistant/ any other employee	Male	Internal Member
4	Advocate/ POSH Expert	Male / Female	External Member
