



Anti Sexual Harassment Policy

Head Office:

SAS Tower, 5th Floor, Sector – 38, Gurgaon, Haryana -122001


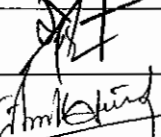
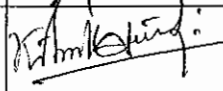
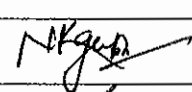
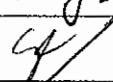
Phone: +91-0124-4834600

Registered Office:

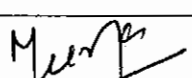
815, 8th Floor, Hemkunt Chamber, 89, Nehru Place, New Delhi-110019

Phone: +91-11-47147000

Anti Sexual Harassment Policy

Name	Designation	Signature	Date
Mr. Rakesh Kumar Dubey	Chief Executive Officer		06/11/2014
Mr. Durgeshwar Kumar Mishra	Chief Financial Officer		06/11/2014
Mr. K K Singh	National Business Head (Operation)		06/11/14.
Mr. Nirmal Kumar Gupta	Head_IT		06/11/2014
Mr. Sandeep Jain	Audit Head		6/11/2014

This Anti Sexual Harassment Policy is approved by the Board of Directors at the Board Meeting held on November 05, 2014.

Prepared and apprised by	Signature	Date
Meena Sheoran (HR-Manager)		6/11/14.

Introduction

SVCL is an equal employment opportunity company and is committed to creating a healthy working environment that enables employees to work without fear of prejudice, gender bias and sexual harassment. The Company also believes that all employees of the Company, have the right to be treated with dignity. Sexual harassment at the work place or other than work place if involving employees is a grave offence and is, therefore, punishable.

HAVING REGARD to the definition of 'human rights' in Section 2(d) of the Protection of Human Rights Act, 1993,

TAKING NOTE of the fact that the present civil and penal laws in India do not adequately provide for specific protection of women from sexual harassment in work places and that enactment of such legislation will take considerable time, It is necessary and expedient for employers in work places as well as other responsible persons or institutions to observe certain guidelines to ensure the prevention of sexual harassment of women.

This Anti Sexual Harassment Policy has been drafted on the basis of c against Sexual Harassment at workplace.

Objective

SVCL is committed to implement best practices that will promote an equal and healthy workplace free from Sexual Harassment. The objectives of this policy therefore aim to:

- Create a work environment where all are treated with dignity and respect;
- Promote awareness about equality and Sexual Harassment;
- Ensure employees are aware of their rights and responsibilities with respect to equality and Sexual Harassment at workplace;
- Provide a prompt and effective redressal mechanism in responding to Sexual Harassment complaints;
- Maintain confidentiality of complaints and related matters;
- Not tolerate retaliation against complaints and/ or individuals cooperating with an investigation into a complaint of sexual Harassment; and
- Create a non- hostile(conducive) environment

Application

This Policy extends to all employees of the Company and is deemed to be incorporated in the service conditions of all employees including full-time Employees, part-time employees and any other person(s), acting pursuant to a contractual relationship with SVCL.



Definition

Sexual harassment includes any unwelcome sexual determined behaviour(whether direct or by implication) but not limited to the following:

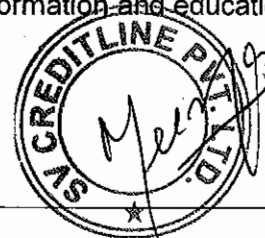
- Physical contact and advances;
- Demand and request for sexual favour;
- Sexual coloured remarks
- Showing pornography; or
- Any other unwelcome physical, verbal or non verbal conduct of a sexual nature.
- Unwelcome sexually determined behaviour shall include, but not be limited to the following instances;
- Where submission to such contact is either an explicit or implicit term or condition of employment, i.e., promotion, training, assigned duties or overtime assignments;
- Where submission to or rejection of the conduct is used as a basis for making employment decisions, i.e., hiring, advancement, and termination: or
- Where such conduct has the purpose or effect of interfering with an individual's work performance or creating an intimidating, hostile, or offensive work environment

Examples of Sexual Harassment include, but are not limited to:

- unwelcome sexual advances, whether they involve physical touching or not;
- sexual epithets, jokes, written or oral references to sexual conduct, gossip regarding one's sex life; comments about an individual's body, sexual activity, deficiencies, or prowess;
- displaying sexually suggestive objects, pictures, or cartoons, including by downloading such materials from the Internet;
- unwelcome leering, whistling, brushing against the body, sexual gestures, or suggestive or insulting comments;
- inquiries into one's sexual experiences; and
- discussion of one's sexual activities.

Preventive Steps

- Circulating SVCL's Anti-sexual Harassment policy at workplace(s)
- Ensuring sexual Harassment as an issue is raised and discussed at SVCL meetings from time to time
- Conducting in house training on Sexual Harassment, in particular with those involved with responding to complaints and otherwise involved with the implementation of this policy.
- Establishing a complaints committee to respond to Sexual Harassment complaints as mentioned below
- Implementing complaints committee's finding and recommendation.
- Make sure that all managers and supervisors understand their responsibility to provide a harassment-free work environment.
- Ensure that all employees understand the policy and procedures for dealing with harassment - new and long-term employees alike - this involves training, information and education.



- Show you mean it - make sure the policy applies to everyone, including managers and supervisors.
- Promptly investigate and deal with all complaints of harassment.
- Take action to eliminate discriminatory jokes, posters, graffiti, e-mails and photos at the work site.

Monitor and revise the policy and education/information programs on a regular basis to ensure that it is still effective for your workplace.

COMPLAINT REDRESSAL 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:

Committee

1. Ms. Meena Sheoran
2. Ms. Alka Srivastava
3. Mr. Surinder Kumar Bhatia
4. Mr. Rakesh Dubey

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

REDRESSAL PROCESS

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 3 days of occurrence of incident.

The Committee will keep a record 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.

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.

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

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.

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 hereof.

In case the complaint is found to be false, the Complainant shall, if deemed fit, be liable for appropriate disciplinary action by the Management.



ENQUIRY PROCESS

The Committee shall immediately proceed with the Enquiry and communicate the same to the Complainant and person against whom complaint is made.

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.

The Complainant shall be provided with a copy of the written explanation submitted by the person against whom complaint is made.

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.

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.

The Committee shall call upon all witnesses mentioned by both the parties.

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.

The Committee shall complete the "Enquiry" within reasonable period but not beyond three months and communicate its findings and its recommendations for action to the Head-HR. The report of the committee shall be treated as an enquiry report on the basis of which an erring employee will be given appropriate punishment straightaway.

The Head-HR will direct appropriate action in accordance with the recommendation proposed by the Committee.

