

## **SEXUAL HARASSEMENT POLICY**

### **1. Preamble:-**

The **BANGALORE SOFTSELL LIMITED** 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. The Supreme Court has also directed companies to lay down guidelines and a forum for redressal of grievances related to sexual harassment.

### **2. The following circumstances, among other circumstances, if occur or present in relation to or connected with any act or behavior 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 all the employees of Company; or
- Humiliating treatment likely to affect her health or safety.

### **3. REDRESSAL PROCESS:-**

- Any employee who feels and is being sexually harassed directly or indirectly may submit a complaint of the alleged incident to the Managing Director of our Company in writing with his/her signature within 10 days of occurrence of incident.
- The Managing Director will maintain a register 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 Managing Director 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. If the Complainant does not wish to depose personally due to embarrassment of narration of event, a lady officer for lady employees involved and a male officer for male employees, involved shall meet and record the statement.

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

#### **4. ENQUIRY PROCESS:-**

- The Board of Director’s shall immediately proceed with the Enquiry and communicate the same to the Complainant and person against whom complaint is made.
- The Board of Director’s 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, he/ she 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 Board of Director’s 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 Board of Director’s shall call upon all witnesses mentioned by both the parties.
- The Board of Director’s 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 Board of Director’s shall complete the “Enquiry” within reasonable period but not beyond three months and communicate its findings and its recommendations for action to the Managing Director. The report of the Board of Director’s shall be treated as an enquiry report on the basis of which an erring employee can be awarded appropriate punishment straight away.
- The Managing Director will direct appropriate action in accordance with the recommendation proposed by the Board of Director’s.

- The Board of Director's shall be governed by such rules as may be framed by the Supreme Court orders or any other legislation enacted later on.

**5. Dissemination of the Policy:-**

A copy of this Policy shall be given to all employees and to all new recruits and they shall sign a statement acknowledging that they have received, read, understood and will abide by the Policy.

**6. Complaints made with a malicious intent:-**

This policy has been evolved as a tool to ensure that in the interest of justice and fair play, our employees have a forum to approach in the event of instances of sexual harassment. However, if on investigation it is revealed that the complaint was made with a malicious intent and with the motive of maligning the concerned individual / tarnishing his/her image in the company and to settle personal/professional scores, strict action will be taken against the complainant. The employees who are victims of sexual harassment may, in addition to the above, seek legal remedies as may be provided under the various laws for the time being in force.