

Sexual Harassment Policy

Introduction

Infahs Private 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. Towards this it is essential that each employee deals with their colleagues and third parties with full fairness and respect and realizes that his/her behavior will be attributed to the Company and can affect its inward and outward reputation.

Under the corporate compliance and directions from The Supreme Court, Company has laid down guidelines and a forum to prohibit, prevent or deter the commission of acts of Sexual Harassment, a form of workplace harassment of a sexual nature that affects the dignity of men and women, at workplace and to provide the procedure for the redressal of complaints pertaining to Sexual Harassment.

The policy is made under the overall ambit of the CTE/SST Code of Conduct and in accordance with the Supreme Court Guidelines on Sexual Harassment at workplace, declared in Vishaka & Others. vs. State of Rajasthan & Others. (AIR 1997 SC 3011).

Applicability

This policy applies to all categories of employees of the Company, including permanent management and workmen, temporaries, all types of contractors, trainees and employees on contract at its workplace or at client sites. The Company will not tolerate Sexual Harassment, if engaged in by clients or by suppliers or any other business associates

The Workplace Includes:

- All offices or other premises where the Company's business is conducted.
- All company-related activities performed at any other site away from the Company's premises.
- Any social, business or other functions where the conduct or comments may have an adverse impact on the workplace or workplace relations.

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 a male to a female employee, it can be vice versa as well as between individuals of same Gender. This Policy comes into force with immediate effect.

Sexual Harassment

“Sexual Harassment” is any unwelcome sexually determined behaviour, such as physical contact and advances; a demand or request for sexual favours; whether verbal, textual, graphic, electronic or by any other action, sexually coloured remarks, showing pornography; and any other unwelcome physical, verbal or non-verbal conduct of sexual nature.

This includes verbal, non-verbal or physical conduct such as obnoxious comments or utterances, remarks or jokes, letters, phone calls, SMS or emails, gestures, showing pornography, stalking, sounds or display of a nature with sexual overtures. It also includes a demand or request for sexual favours in return for with a promise of work related favours such as performance

appraisals, promotions, transfers, salary increases and employment or any other form of reward and recognition.

Complaint Redressal Committee

The Complaints Redressal Committee has been constituted with the following 3 members

S.No	Name	Designation
1	Nazir Ahmad	Manager - Human Resources
2	Zahida Jan	Manager - Accounts & Finance
3	Mehvish Bakshi	Manager - IT

Redressal Process

- Any employee who feels and is being sexually harassed directly or indirectly may submit a complaint of the alleged incident to the Committee through an email to hr@infahs.co.in within 10 days of occurrence of incident.
- 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. 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 as nominated by the management, 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.

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 Management.
- The report of the committee shall be treated as an enquiry report on the basis of which an erring employee can be awarded appropriate punishment straightaway.
- The Management will direct appropriate action in accordance with the recommendation proposed by the Committee.
- The Committee shall be governed by such rules as may be framed by the Supreme Court orders or any other legislation enacted later on.

Disciplinary Action

In the event where the accused is found guilty by the Committee, appropriate disciplinary action shall be taken against the accused. Disciplinary action may include transfer, withholding promotion, suspension or even dismissal. This action shall be in addition to any legal recourse sought by the complainant.

Confidentiality

All information received shall be kept confidential. Any person (including witnesses) who breaches confidentiality shall be subject to disciplinary action.

Protection against Retaliation

Regardless of the outcome of the complaint made in good faith, the employee lodging the complaint and any person providing information or any witness, will be protected from any form of retaliation. While dealing with complaints of Sexual Harassment, the Committee shall ensure that the Complainant or the witness are not victimised or discriminated against by the accused. Any unwarranted pressures, retaliatory or any other type of unethical behaviour from the accused against the complainant while the investigation is in progress should be reported by the complainant to the Complaints Committee as soon as possible. Disciplinary action will be taken by the Complaints Committee against any such complaints which are found genuine.

Dissemination of the Policy

A copy of this Policy will be available in HRIS and is accessible for all the employees.

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.

Thanks.

Infahs Private Limited.

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