



POLICY ON PREVENTION AND REDRESSAL OF SEXUAL HARASSMENT

Effective Date: 28 September 2021

POLICY ON PREVENTION AND REDRESSAL OF SEXUAL HARASSMENT

1. SCOPE AND INTRODUCTION

Electronics City Industrial Township Authority (ELCITA) believes in providing equal employment opportunity and is committed to create a safe and healthy environment for all. Therefore, harassment of any form is against the high standards of conduct that is practiced by ELCITA and one who fails to abide by it will have to face strict disciplinary consequences.

ELCITA has a policy against prohibition and redressal of harassment. It is a gender-neutral policy and prohibits sexual harassment and harassment based on pregnancy, childbirth or related medical conditions, race, religious creed, color, national origin or ancestry, physical or mental disability, medical condition, marital status, age, sexual orientation, or any other basis protected by a local law or ordinance or regulation. This policy against sexual harassment at workplace is in compliance with the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and the Government of India, Ministry of Women and Child Development Notification dated 19.12.2013.

This organization will not tolerate harassment whether engaged by fellow employees, managers, officers, directors, or contract service providers of the organization. Harassment or discrimination against employees on any grounds mentioned in the policy is prohibited.

This policy applies to all persons involved in the operations of ELCITA including those of partner/vendor companies and prohibits unlawful harassment from/to any employee of these companies towards from/to other employees including supervisors, vendors and clients.

ELCITA provides protection from any retaliation against an individual for filing a complaint. Confidentiality is another important assurance given to the individuals involved in a complaint.

2. APPLICABILITY

It applies to all ELCITA employees working in India, including those on deputation to India, contract, temporary, part time or working as consultant. It is also applicable to sub-contractors and vendors.

3. DEFINITIONS

- 'Sexual harassment' includes:
 - a. physical contact and advances
 - b. a demand or request for sexual favours.
 - c. sexually coloured remarks
 - d. showing pornography
 - e. any other unwelcome physical, verbal or non-verbal conduct of sexual nature.
- 'Aggrieved' – a woman intimating in writing or orally complaining of having faced Sexual Harassment at workplace.
- 'Respondent' – A person alleged to have committed sexual harassment as defined under this policy.
- Witness – a person having witnessed the alleged behavior
- Complainant – a person intimating in writing or orally complaining of having faced Sexual Harassment at workplace.



- 'Workplace' includes all ELCITA premises, client or vendor premises or any place visited by the employee arising out of or during the course of employment including transportation or any facilities provided by the company.

MAIN CONTENTS OF POLICY

4. CONSTITUTION OF Internal Committee (IC)

ELCITA has constituted IC in all the offices of the company across India to consider and redress all complaints of sexual harassment.

The constitution of IC is as per the Act and includes external members from amongst NGO or persons familiar with the issues.

IC shall be governed by the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and the Ministry of Women and Child Development notification or any other legislation or rules that may be enacted later on.

5. REDRESSAL PROCESS

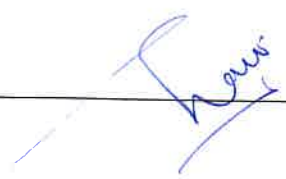
The following is the redressal process as prescribed:

- a) Complaint may be submitted to the IC within 3 months from the date of the last incident of sexual harassment.
- b) Complaint to be signed and submitted to the HR manager or Chief Security Officer.
- c) If aggrieved cannot make written representation, then the IC will make arrangements to do so.
- d) If due to any physical or mental incapability of the aggrieved, the aggrieved cannot make the complaint, the legal heirs or any person related to such person can make the complaint on their behalf.
- e) After receiving the complaint, the IC will hold a meeting with the complainant and after which the investigation will be initiated.
- f) If the complaint given does not fall within the scope of sexual harassment, then the IC will redirect the complaint to the suitable forum for redressal. If the complaint is from a 'complainant', as defined above, it will be addressed as per this Policy.
- g) If it is prima facie found to be a complaint of sexual harassment, then the IC will summon the Respondent and he will be given an opportunity to explain.
- h) IC will complete the investigation within the reasonable time and not beyond three months and a report will be submitted to the company as well as to the parties concerned within 10 days.
- i) On receipt of the report, parties shall make their representations within 7 days, against the report.
- j) ELCITA to implement the final recommendations of the IC within 60 days of the report being submitted to the company.

6. CONCILIATION

If the parties decide to settle the matter by conciliation, then such settlement will be recorded and copies of it will be given to the parties and ELCITA. No further inquiry be conducted after.

7. EX-PARTE DECISIONS



If the parties fail to present themselves, then the termination of the investigation procedure or ex-parte decisions may be given by the IC

8. FILING OF FALSE COMPLAINTS AND EVIDENCE

If the IC arrives at a conclusion that the complaints made or evidence produced against the Respondents are malicious or false, then such Complainants or any other person who made the complaint knowing it to be false, may face disciplinary action including, but not limited to termination as per the IC's recommendation made to ELCITA.


9. POWERS OF IC

The IC may recommend to the company to:

- a. transfer the respondent to any other workplace, if feasible.
- b. grant leave to the aggrieved woman (more than ELCITA's set leave standards)
- c. grant other such relief as may be prescribed
- d. restrain the respondent from reporting on the work or send confidential reports to the aggrieved woman.
- e. if the allegations are proved to be true IC shall recommend ELCITA to-
 - i. take actions as per the Act, employee handbook, Code of Conduct, Standing Orders or any other applicable rules, regulations or policies of ELCITA.
 - ii. deduct salary of the Respondent for such sum to be paid as compensation to the Complainant or their legal heirs.
 - iii. if the Respondent is unable to pay from salary then it should direct the Respondent to pay the compensation directly to the Complainant.

10. APPEAL

Appeals may be made to the respective tribunal or court within 30 days from the date of recommendation made.


Lt Col Ravindra Singh (Retd)

Chief Executive Officer

Electronics City Industrial Township Authority (ELCITA)

Bangalore

Date: 28 September 2021