

SEXUAL HARASSMENT IN OEC RECORDS MANAGEMENT PVT LTD

Objective:

Our Company is committed to promote a work environment that is conducive to the professional growth of its employees and encourages equality of opportunity. The Company will not tolerate any form of sexual harassment and is committed to take all necessary steps to ensure that its employees are not subjected to any form of 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 serious offence by Law and is, therefore, punishable. The Supreme Court has also directed to lay down guidelines and forum for redressal of grievance related to sexual harassment .

Scope:

The policy is directed to ensure zero tolerance towards verbal, psychological conduct of a sexual Nature by any employee or stakeholder that directly or indirectly harasses, disrupts, or interfaces with another's work performance or that creates an intimidating, offensive, or hostile environment. This policy applies to all individuals who are employed in OEC Records Management Pvt Ltd and includes apprentice / contract/ outsourced / trainee and Permanent employees.

Definition of SEXUAL HARASSMENT:

The definition of sexual harassment is any physical, verbal, gestural, improper or unwelcome Sexual advances. Sexual harassment may vary from depending on circumstances. It may consist of, but not limited to, any of the following:

- Unwelcome sexual advances, requests for sexual favors, display of sexual visuals, sexual audios, pornographic or obscene material and any other verbal or physical conduct of a sexual nature, drawing sex-based sketches or writing sex-based letters, sexual exposure. letters or calls of a sexual nature.
- Transmitting any message, by mail, telephone, e-mail etc. which is obscene, lewd, suggestive or purely sexual in nature.
- Any communication wherein a sexual favor or demand, whether by words or actions, is made a condition for an individual's employment, career progress, promotion etc. thereby creating a hostile environment.
- Sexually charged jokes or remarks and behavior which have sexually oriented innuendoes, suggestive comments about a person's appearance, body or clothing. Derogatory remarks concerning personal or physical characteristics or appearance.
- Consistent pattern of unnecessary physical contact, staring or targeting unreasonable attention at an individual in day to day dealings. Leering or ogling with suggestive overtones, licking lips, hand signal or sign language denoting sexual activity, persistent Flirting. Persistent teasing.
- Any pervasive pattern of behavior which makes employees uncomfortable, insecure or feels humiliated or disadvantaged on the basis of gender differentiation. Continued pressure for dates and/or sexual favors direct sexual propositioning
- inappropriate touching or Molestation stalking, eve teasing –patting, pinching, stroking, brushing up against the body, hugging, kissing, fondling, sexual assault.

- Any other act that may by law be termed as sexual harassment.

Policy guidelines / Preventive steps:-

As sexual harassment is regarded as misconduct, the management and employees will take active steps to ensure that employees are not subjected to this form of degradation in the workplace.

- Any of the above mention act at work place or outside in relation to an employees of OEC or vice versa found guilty , an appropriate action will be taken as per conduct rules during the course of employment of the particular employee
- Where such conduct amounts to a specific offence under the Indian Penal Code or under any other law, OEC shall initiate appropriate action in accordance with law by making complaint with the appropriate authority.
- In the case of any allegation of sexual harassment, whether or not it is found to be an incident of sexual harassment, management will ensure that any victimization that may later result from lodging the complaint is dealt with most severely. Disciplinary steps will be taken against personnel who victimize or intimidate a complainant.
- Disciplinary steps will be taken against employees who lodge false accusations.
- If the alleged harasser is found not to have committed misconduct, no disciplinary action shall be taken against an employee who has filed a complaint in good faith.
- All information must be treated with the utmost confidentiality. Parties involved in an allegation of sexual harassment are, in their own best interest, advised not to discuss the matter with colleagues who are not involved and who are not representing them in the matter.

Complaint Mechanism:-

Whether or not such conduct constitutes an offence under law or a breach of the service rules, the complaint mechanism for redressing the complaint made by the victim is as follows:

i. Internal Complaints Committee:

The Internal Complaints Committee will comprise of minimum 6 employees and will be Headed by a woman. Half of its member will be women. The Internal Complaints Committee shall meet at least once in three months.

The Internal Complaints Committee on receipt of a complaint will follow the process and will make periodic reports to the management of the complaints and action taken by them.

ii. (a) That after the receipt of the complaint, the management or HR shall immediately hand-over the complaint to the Internal Complaints Committee.

(b) On receipt of the complaint, the Internal Complaints Committee will organize its meeting with the complainant to enquire into the matter and intimate date, time and place of enquiry to the concerned parties.

(c) The Internal Complaints Committee will normally complete this enquiry and make its formal recommendation within 30 days from the date of receiving the complaint unless there are exceptional circumstances.

(d) Internal Complaints Committee would be enquiring and Interviewing the complainant, alleged harasser, and other relevant parties, such as witnesses and the

employee's supervisor.

(e) The Internal Complaints Committee will be empowered to ask any of the employees to appear before it. The Internal Complaints Committee can also investigate the matter from the person / persons against whom the complaint is being made.

(f) Internal Complaints Committee will prepare a written report regarding the findings and conclusions reached. Based on the findings if it is determined that accusation is true and sexual harassment has occurred, recommend for the disciplinary action to be taken including termination if appropriate.

This report shall be furnished to the Management of the company, complainant, and the alleged harasser. The severity of the disciplinary action shall be determined by the severity and/or frequency of the offense(s). The complainant and the harasser shall both be notified of the action(s) to be taken.

(g) In order to ensure that this important matter is not trivialized, any complaint, which, in the opinion of the Internal Complaints Committee, is blatantly false or frivolous or has been motivated by reasons that are clearly unconnected with gender issues, would be Viewed very seriously by the company and appropriate action taken against such Complainants.

iii. Where the Company is legally advised that any such incident constitutes a criminal offence, the Company will inform the relevant authority, provide full details and request appropriate action. If the aggrieved employee directly takes any action, against the offending employee, either civil or criminal, the Internal Complaints Committee, on becoming aware of such action by the aggrieved employee, shall be entitled to, start the internal enquiry / investigation and recommend appropriate action.

Members:

<u>Name Of the Core Team for Sexual Harassment policy HO</u>			
<u>Sr. No</u>	<u>Employee Name</u>	<u>Mobile No.</u>	<u>Designation</u>
<u>1</u>	Ms. Shweta Sawant	7498914208	Manager HR
<u>2</u>	Ms. Pooja Pandhare	7498914242	Asst. Manager Accounts
<u>3</u>	Ms. Archana Kasi	7498914224	Manager Q.C.
<u>4</u>	Mr. Pradeep Kolatheril	7498914217	Manager Security
<u>5</u>	Mr. Girish Annath	7498914220	V. P. Admin, HR. & Security
<u>6</u>	Mr. Viral Doctor	9820353073	Executive Director

Complaint Resolution:

1) Informal Procedure: In order to assure that further incidents do not occur, employees who believe that they have been subjected to sexual harassment should promptly inform the harasser that such conduct is inappropriate, offensive, and unwelcome. The matter could be reported to immediate manager or advisors (from HR) who could talk to the harasser and informally resolve

the problem. If an issue cannot be immediately resolved, the employee would promptly refer the

matter or complaint in writing to HR. Who shall be responsible to investigate and resolve the alleged incident(s) of sexual harassment.

It is at the sole discretion of complainant to get the matter resolved by Informal or Formal procedure (filing complaint in writing).

2) Formal Procedure: In the event that informal resolution does not result in a satisfactory conclusion, the employee may pursue formal resolution by submitting a written and signed statement on hard copy or through e-mail to the HR department or local Representative. This statement shall include the dates, times, and places of incident(s), a description of the circumstances, and the names of the persons involved and witnesses present.

Employees shall have the right to file such complaints without the fear of reprisal or recrimination. Employees engaging in acts of reprisal or recrimination resulting from a complaint of sexual harassment shall be subject to disciplinary action up to and including termination.

If an anonymous complaint is received by the HR in reference related to Sexual harassment, the matter will be fully examined by the concerned senior management and its

Conclusions and plans for necessary action will be communicated to the Internal Complaints Committee.

Action to be taken on report:-

That after the receipt of the report from Internal Complaints Committee, the guilty be punished in accordance with law including the below mentioned corrective actions.

- a. Formal apology
- b. Counseling
- c. Written warning to the perpetrator and a copy of it maintained in the employee's file.
- d. Change of work assignment / transfer for either the perpetrator or the victim.
- e. Suspension or termination of services of the employee found guilty of the offence.

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

PROTECTION TO COMPLAINANT / VICTIM:

The Company will ensure that victim or witnesses are not victimized or discriminated against while dealing with complaints of sexual harassment.

However, anyone who abuses the procedure (for example, by maliciously putting an allegation knowing it to be untrue) will be subject to disciplinary action.

CONFIDENTIALITY:

The Company understands that it is difficult for the victim to come forward with a complaint of sexual harassment and recognizes the victim's interest in keeping the matter confidential. To protect the interests of the victim, the accused person and others who may report incidents of sexual harassment, confidentiality will be maintained throughout any investigatory process to the extent practicable and appropriate under the circumstances.

CONCLUSION:

In conclusion, the Company reiterates its commitment to providing its employees, a workplace free from harassment/ discrimination and where every employee is treated with dignity and respect.

