

## **Policy on Prevention of Sexual Harassment**



**Policy on Prevention of Sexual Harassment of Women at Workplace**  
**Ref: SHWW – RS – 111-1-2014**

## **Policy on Prevention of Sexual Harassment**

### **1. INTRODUCTION**

This policy has been framed in accordance with the provisions of “The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013” and Rules framed thereunder.

Remfry & Sagar (‘the Firm’) believes that sexual harassment results in violation of fundamental rights of a woman to equality and freedom. Such right/s include the right to practice any profession or carry on any occupation, trade or business in a safe environment - free from sexual harassment.

### **2. SEXUAL HARASSMENT**

Sexual harassment includes any one or more of the following unwelcome acts or behaviour (whether directly or by implication) viz.:-

- (i) physical contact and advances;
- (ii) a demand or request for sexual favours;
- (iii) making sexually coloured remarks;
- (iv) showing pornography; or
- (v) any other unwelcome physical, verbal or non-verbal conduct of sexual nature.

Specifically, the following circumstances, if occur or are connected with any act or behaviour of sexual harassment may amount to sexual harassment:

- (i) implied or explicit promise of preferential treatment in her employment;
- (ii) implied or explicit threat of detrimental treatment in her employment;
- (iii) implied or explicit threat about her present or future employment status;
- (iv) interference with her work or creating an intimidating or offensive or hostile work environment for her; or
- (v) humiliating treatment likely to affect her health or safety.

### **3. INTERNAL COMPLAINTS COMMITTEE**

Internal Complaints Committee (ICC) is constituted by the Firm to deal with matters pertaining to sexual harassment and to create an environment where no woman engaged with the Firm is subjected to sexual harassment.

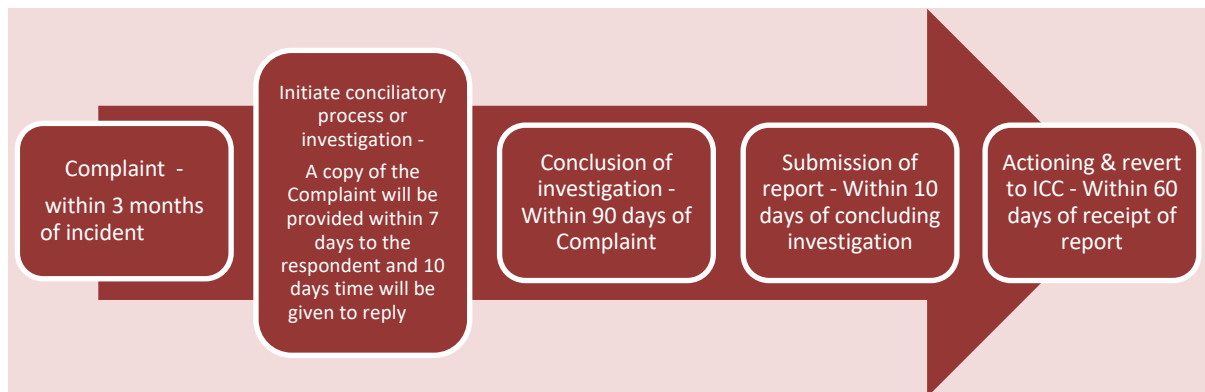
Nominated members of ICC and their details are given in Annexure A.

### **4. COMPLAINT**

An aggrieved person may make a written complaint to ICC providing all necessary details of the incident along with available documentary evidence and names of witnesses, if any (‘the Complaint’) within a period of 3 months of occurrence of the incident. In case of a series of incidents, the Complaint is to be filed within a period of 3 months from the date of last incident. The Complaint may be sent by email, post or delivered by hand.

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### 5. GRIEVANCE REDRESSAL PROCESS



- (i) On receiving a Complaint, ICC may take steps to settle the matter through conciliation. However, no monetary settlement shall be made as a basis of conciliation;
- (ii) Even without resorting to conciliation, ICC may proceed with the investigation and make enquiries;
- (iii) One (1) copy of the Complaint will be sent to the respondent (person against whom the Complaint is raised) within a period of seven (7) working days calling upon the respondent to file a reply, along with supporting documents and names of witnesses (if any), within ten (10) working days from the date of receipt of the Complaint;
- (iv) ICC shall conclude its investigation within a maximum period of ninety (90) days from receipt of Complaint and submit its report to the Managing Partner of the Firm within ten (10) days of concluding investigation;
- (v) Action shall be taken as per recommendation of ICC report within sixty (60) days of receipt of report.
- (vi) Any confirmed case of sexual harassment will be considered to be a misconduct and can lead to termination of service.

### 6. CONFIDENTIALITY

Every reasonable effort shall be made to maintain confidentiality of all parties involved. Statements recorded and other evidence obtained in the course of the enquiry / proceedings, report and findings of ICC, action taken etc. shall all be confidential information.

### 7. AMENDMENT

This Policy may, by a written document, be amended or modified in whole or in part.

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### ANNEXURE A

#### Members of ICC:

Ms. Ritushka Negi  
([ritushka.negi@remfry.com](mailto:ritushka.negi@remfry.com))

Presiding Officer

Mr. Cyril Abrol  
([cyril.abrol@remfry.com](mailto:cyril.abrol@remfry.com))

Member

Mr. Nitin Kalra  
([nitin.kalra@remfry.com](mailto:nitin.kalra@remfry.com))

Member

Ms. Kiran Modi  
([kiranmodi@udayancare.org](mailto:kiranmodi@udayancare.org))

External Member