

STARLOG ENTERPRISES LIMITED

ANTI SEXUAL HARASSMENT POLICY



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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 (hereinafter “the Act”).

Objective:

To provide harmonious and safe conditions at workplace that redress complaints of sexual harassment in an unbiased and effective manner, with an approach of zero tolerance.

Definitions:

1. Company’ shall mean Starlog Enterprises Limited.
2. ‘Employee’ means any person employed in the Company for any work on regular, temporary, voluntary, ad hoc basis either directly or through an agency, including co-worker, contractors, contract worker, probationer, consultants, trainees.
3. ‘Harassment’ means any behavior based on gender, race, religion, national origin, age, sexual orientation or other protected classifications, directed towards a specific person(s), and which affects working environment adversely. Harassment may take place at work, work related event / activity / outside workplace and may occur during or after office hours.
4. “Sexual Harassment” includes any one or more of the following unwelcome acts or behavior (whether directly or by implication):
 - a) Any unwelcome sexually determined behavior, or pattern of conduct, that would cause discomfort and/or humiliate a person at whom the behavior or conduct was directed namely:
 - i. Physical contact and advances;
 - ii. Demand or request for sexual favors;
 - iii. Sexually colored remarks or remarks of a sexual nature about a person's clothing or body;

- iv. Showing pornography, making or posting sexual pranks, sexual teasing, sexual jokes, sexually demeaning or offensive pictures, cartoons or other materials through email, SMS, MMS, whatsapp messages etc.;
- v. Repeatedly asking to socialize during off-duty hours or continued expressions of sexual interest against a person's wishes;
- vi. Giving gifts or leaving objects that are sexually suggestive;
- vii. Eve teasing, innuendos and taunts, physical confinement against one's will or any such act likely to intrude upon one's privacy;
- viii. Persistent watching, following, contacting of a person; and
- ix. Any other unwelcome physical, verbal or non-verbal conduct of sexual nature.

b) The following circumstances if it occurs or is present in relation to any sexually determined act or behavior amount to sexual harassment:

- Implied or explicit promise of preferential treatment in employment;
- Implied or explicit threat of detrimental treatment in employment;
- Implied or explicit threat about the present or future employment status.

Applicability:

All employees of the Company whether permanent, temporary or contractual. Any such sexual harassment which has taken place whether within or without office hours.

Internal Complaints Committee:

A committee to redress complaints of Sexual Harassment in nature shall be called as "Internal Complaints Committee". The Internal Complaints Committee shall consist of one Board Member as Chairperson and two other members from the employees of the company.

The two employee Members should be committed to the cause of women or who have had experience in social work or have should possess legal knowledge. The Chairperson and every member of the Internal Complaints Committee shall hold office for a period of 2 years.

For conducting the inquiry, all three Members of the Complaint Committee including the Chairperson should be present.

Guidelines:

Any aggrieved employee may make, in writing, a complaint of sexual harassment at workplace to the Internal Complaints Committee within 15 days. In case of any delay justification has to be submitted to the Internal Complaints Committee. Complaint to be registered along with supporting documents and the names and addresses of the witnesses. The alleged respondent shall file his reply to the complaint along with his list of documents, and names and addresses of witnesses within 15 days of intimation of such complaint. If the aggrieved employee or alleged respondent fails, without sufficient cause, to present herself or himself for three consecutive hearings convened by the Chairperson then Internal Complaints Committee has a right to terminate the inquiry proceedings or give a unilateral decision.

The committee will hear both sides during the course of inquiry and will allow parties to make representation against the findings. The inquiry should be completed within 90 days from the date of complaint.

Action against alleged respondent:

One of the following actions can be taken against the alleged respondent, if allegations are proved right:-

- Written Apology;
- Warning;
- Counseling;
- Reprimand;
- Withholding of Increments;
- Fine of an amount as decided by Internal Complaints Committee, which can be deducted from salary;
- Termination of service;
- In case it is established by the Committee that charges against the alleged respondent are false and malicious, Complainant will suffer one of the above actions. Though a mere inability to substantiate a complaint or provide adequate proof need not attract action against the complaint.

Settlement:

A settlement can be reached between aggrieved employee and alleged respondent; however, monetary compensation should not be the basis for same.

Confidentiality:

Cases that involve allegations of sexual harassment are especially sensitive and special attention will be given to the issue of privacy for all individuals. Information will be released only on need-to-know basis.

Frivolous or false charges:

This policy shall not be misused to bring frivolous or malicious charges against fellow colleagues. Strict disciplinary action shall be taken against any person bringing a charge of harassment in bad faith. This may cause disciplinary actions including but not limited to a written apology, warning, reprimand, withholding of promotion, withholding of increments or any component of the remuneration, terminating the respondent from service or undergoing a counseling session.

Dissemination of Policy:

This Policy shall be hosted on the website of the Company.

Amendments:

The Board of Directors shall alter, amend or modify the clauses of this Policy from time to time in line with the requirement of the The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and rules framed thereunder (hereinafter “the Act”).