


REVISION HISTORY			
REV	Description of Change	Author	Effective Date
1.0	Sexual Harassment Policy	Ajit Kar	08-July-10
1.2	Formatted the policy as per the standard	Manasi Das	03-Apr-12
1.4	Added the clauses on Confidentiality, Criminal proceedings and Malafide complainants	Asit Mohanty	06-Feb-14
2	Revised the clauses- Responsibilities regarding Sexual harassment, Confidentiality, Redressal process. Added Tips for preventing Harassment	Manasi Das	19-Nov-16

Table of Contents

1. Policy Statement :	1
2. Purpose :	1
3. Scope :	1
4. Definition of Sexual Harassment :	1
5. Responsibilities regarding Sexual Harassment :	2
6. Confidentiality :	2
7. Internal Complaints Committee (ICC) :	3
8. Redressal Process :	3
9. Enquiry Process :	4
10. Proceedings for Sexual Harassment :	5
11. Malafide Complaints :	6
12. Tips for preventing Harassment :	6

	Quality System Procedure ISO 9001-2008 - CSM Technologies	Document #: CSM/QSP/28	Rev.: 2 Page #: 1 of 7
	Sexual Harassment Policies		

1. Policy Statement :

CSM is committed to create a healthy working environment that enables employees to work without fear of prejudice, gender bias and sexual harassment. The Company also believes that all employees of the Company have the rights to be treated with dignity. Sexual harassment at the work place or other than work place if involving employees is a grave offence and is, therefore, punishable.

The Supreme Court has also directed companies to lay down guidelines and a committee for redressal of grievances related to sexual harassment. So CSM 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 harassment.

2. Purpose :

The purpose of this policy is to create awareness amongst employees to deter the act of sexual harassment in CSM. It will

- 2.1 Prevent the occurrence of sexual harassment
- 2.2 Enable a fair mechanism for dealing with such conduct
- 2.3 Raise awareness of the importance of policy
- 2.4 Create harmonious and safe working environment
- 2.5 Educate the employees about what conduct constitutes sexual harassment

3. Scope :

The coverage/scope of the policy extends to all Full Time Employees(FTE) of CSM who has completed a minimum tenure of Five consecutive years with CSM as mentioned in the Point. No.-4 Eligibility section.

The Scope of this policy covers:

- 3.1 All the employees of CSM working at HO and SBUs including those on probation, training, internship and on contract basis.
- 3.2 It will also covers the Vendors who are professionally associated with CSM.
- 3.3 An alleged acts of sexual harassment by employee(s), whether the incident has occurred during or beyond office hours, within or out of company premises.
- 3.4 Any social, business or other functions, where the conduct or comments by employee(s) may have an adverse impact on the workplace or work place relations.

4. Definition of Sexual Harassment :

Sexual harassment would mean and include any of the following:

	Quality System Procedure ISO 9001-2008 - CSM Technologies	Document #: CSM/QSP/28	Rev.: 2 Page #: 2 of 7
	Sexual Harassment Policies		

- 4.1 Unwelcome sexual advances, requests or demand for sexual favors, either explicitly or implicitly, in return for employment, promotion, examination or evaluation of a person towards any company activity.
- 4.2 Unwelcome sexual advances involving verbal, non-verbal, or physical conduct such as sexually coloured remarks, jokes, letters, phone calls, e-mail, gestures, showing of pornography, lurid stares, physical contact or molestation, stalking, sounds, display of pictures, signs, verbal or non-verbal communication which offends the individuals sensibilities and affect her/his performance;
- 4.3 Eve teasing, innuendos and taunts, physical confinement against one's will and likely to intrude upon one's privacy.
- 4.4 Act or conduct by a person in authority which creates the environment at workplace hostile or intimidating to a person belonging to the other sex.
- 4.5 Conduct of such an act at work place or outside in relation to an Employee of CSM, or vice versa during the course of employment; and
- 4.6 Any unwelcome gesture by an employee having sexual overtones.

5. Responsibilities regarding Sexual Harassment :

- 5.1 All employees have a personal responsibility to ensure that their behavior is not contrary to the policy;
- 5.2 All employees are encouraged to reinforce the maintenance of a work environment free from sexual harassment.
- 5.3 If you are harassed :
 - 5.3.1 Do not remain silent. State clearly that you want the offensive conduct to stop.
 - 5.3.2 Report to your Manager/ICC member and HR.
 - 5.3.3 Keep a written record of the date, time, and nature of the incident(s) and the names of witnesses if any.
 - 5.3.4 Do NOT publicize an alleged harassment without following the reporting procedures.

6. Confidentiality :

CSM 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. Therefore the following members are bound to maintain the confidentiality during the process of investigation.

- 6.1 Victim, the accused person

	Quality System Procedure ISO 9001-2008 - CSM Technologies	Document #: CSM/QSP/28	Rev.: 2 Page #: 3 of 7
	Sexual Harassment Policies		

6.2 Others directly or indirectly involved in the incident

6.3 ICC members

6.4 To protect the interest 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

7. Internal Complaints Committee (ICC) :

An internal complaints committee has been formed consisting following.

Sr. No	Name	Position in Committee
1	Lagna Panda, Chief Resource Manager (HR)	Chair Person
2	Mrutyunjaya Panda, Program Manager (EBG)	Member
3	Pradyut Mohan Dash, Program Manager (BSS)	Member
4	Prafulla Parida, IT Manager (NSA)	Member
5	Manasi Das, Asst Manager (HR)	Member (MoM & Records)
6	An. Additional member(Woman) from outside will be called if required	


8. Redressal Process :

8.1 Any employee who feels and is being sexually harassed directly or indirectly, may submit a complaint of the alleged incident to any member of the Committee in mail or in writing with his/her signature within Ten (10) to Ninty (90) days of occurrence of the incident.

- Receipt of complaint → 90 Days
- Send copy to the Respondent → 7 Days
- Respondent reply to be received→ 10 Days
- Conciliation → NA (based on the case)
- Enquiry Process → 90 Days(Maximum)
- Report to be submitted →10 Days
- To implement recommendations → 60 Days

8.2 The Committee will maintain a register to endorse the complaint received by it and keep the contents confidential, if it is so desired, except to use the same for discreet investigation.

8.3 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.

	Quality System Procedure ISO 9001-2008 - CSM Technologies	Document #: CSM/QSP/28	Rev.: 2 Page #: 4 of 7
	Sexual Harassment Policies		

- 8.4 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.
- 8.5 If the Complainant does not wish to depose personally due to embarrassment of narration of the event, a lady officer for lady employees involved and a male officer for male employees, involved shall meet and record the statement.
- 8.6 Thereafter, the person against whom the 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.
- 8.7 In the event, if the complaint does not fall under the purview of Sexual Harassment or the complaint does not mean an offense of Sexual Harassment, the same would be dropped after recording the reasons thereof.
- 8.8 In case the complaint is found to be false, the Complainant shall, if deemed fit, be liable for appropriate disciplinary action by the Management.

9. Enquiry Process :

- 9.1 The Committee shall immediately proceed with the Enquiry and communicate the same to the Complainant and person against whom complaint is made.
- 9.2 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.
- 9.3 The Complainant shall be provided with a copy of the written explanation submitted by the person against whom complaint is made.
- 9.4 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.
- 9.5 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.
- 9.6 The Committee shall call upon all witnesses mentioned by both the parties.
- 9.7 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.

	Quality System Procedure ISO 9001-2008 - CSM Technologies	Document #: CSM/QSP/28	Rev.: 2 Page #: 5 of 7
	Sexual Harassment Policies		

- 9.8 The Committee shall complete the "Enquiry" within a reasonable period, but not beyond three months and communicate its findings and its recommendations for action to the Head-HR. The report of the committee shall be treated as an inquiry report on the basis of which an erring employee can be awarded the appropriate punishment straightaway.
- 9.9 The Head-HR will direct appropriate action in accordance with the recommendation proposed by the Committee.

10. Proceedings for Sexual Harassment :

10.1 Proceedings

- 10.1.1 Where such conduct amounts to a specific offense under the IPC or under any law, the HR department based on advice from the committee may initiate appropriate action in accordance with law by making a complaint with the appropriate authority.
- 10.1.2 If any legal case is filed at any police station against the accused employee by the victim (employee/outsider), then the accused employee will be immediately terminated without any notice period.
- 10.1.3 If the accused is found to be innocent after a final probe by the legal authority, then Management may consider his re-employment in the organization after due consultation with the company lawyer.

10.2 Actions:

- 10.2.1 The Management as per the reports from the committee can impose the following penalties, which are indicative and not exhaustive on an employee who is found guilty of sexual harassment. These can be further classified as minor and major penalties, as follow:

10.3 Minor Penalties

- 10.3.1 Written Warning
- 10.3.2 Counselling

10.4 Major Penalties

- 10.4.1 Withholding of performance based pay awards and bonus
- 10.4.2 Withholding of promotion
- 10.4.3 Withholding of salary
- 10.4.4 Demotion
- 10.4.5 Transfer
- 10.4.6 Suspension from job
- 10.4.7 Termination of service

	Quality System Procedure ISO 9001-2008 - CSM Technologies	Document #: CSM/QSP/28	Rev.: 2 Page #: 6 of 7
	Sexual Harassment Policies		

Note:

As per the Criminal Law (Amendment) Act, 2013, which is effective from 3rd Feb 2013, sexual harassment and/or assault or use of criminal force to woman with intent to outrage her modesty or intent to disrobe, stalking, voyeurism has a punishment of imprisonment of 1yr to 7 yrs with fine(which is non-bailable in nature).

11. Malafide Complaints :

If the investigations reveal that the complaint is unjustified or complainant has raised the concern with ulterior motives, then the Chair Person of the committee will counsel the complainant & recommend suitable action to prevent recurrence while ensuring the complainant is not victimized or other associates deterred from raising concerns in future.

12. Tips for preventing Harassment :

- A. Professionalism at all times. Attitude, behaviour, dress.
- B. Review behaviour on:
 - a) Could it hurt or offend anyone ?
 - b) Could it be interpreted by someone as sexual harassment ?
 - c) Would I be ok if this happened to a family member ?
- C. Establish clear boundaries "Say NO" if asked to go places, do things or participate in situations that make you uncomfortable.
- D. Value your instincts. You have a right to walk away from uncomfortable situations.
- E. Emphatic NO as soon as it occurs. If it continues, keep details of dates/times/places/witnesses and what happened.
- F. Notify company. Use the informal or formal route as appropriate.
- G. Trust yourself and help others build back a sense of well being. Unpleasant experiences can be emotionally draining.