

## **Sexual Harassment Policy**

TrilaSoft Solutions Pvt. Ltd. is an equal employment opportunity employer and is committed to creating a safe environment for everyone working in its organization. The company also believes that all employees of company have a right to be treated with dignity and respect. Sexual harassment at the work place against any employee will not be tolerated and appropriate action will be taken.

### **Policy Effective Date: 1<sup>st</sup> February 2014**

The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 is a legislative act in India that seeks to protect women from sexual harassment at their place of work. It was passed by the Lok Sabha (the lower house of the Indian Parliament) on 3 September 2012. It was passed by the Rajya Sabha (the upper house of the Indian Parliament) on 26 February 2013. The Bill got the assent of the President on 23 April 2013. The Act came into force from 9 December 2013.



### **Scope**

This policy extends to all employees of the company and its deemed to be incorporated in service condition of all employees, trainees or employees working in the office or at client sites. The Company will not tolerate sexual harassment, if engaged in by clients or by suppliers or any other business associates.

The work place includes:

- All office or other premises where the company's business is conducted
- Any social, business or other functions where the conduct or comments may have an adverse impact on workplace relations



### **What is Sexual Harassment**

Sexual harassment includes such unwelcome sexually oriented behavior by any person either individually or in association with other persons or by any person in authority whether directly or by implication including (but not limited too):

- Eve-teasing, glaring, unwanted advances, etc.
- Unsavory personal remarks (on personal looks, clothes, personal belonging and family)
- Jokes causing or likely to cause awkwardness or embarrassment
- Innuendos, gestures and taunts

- Giving insulting work related comments
- Gender based insults or sexist remarks
- Unwelcome sexual overtone in any manner such as telephone (obnoxious telephone calls) and the like
- Touching or brushing against any part of the body and the like
- Displaying or offensive pictures, cartoons, pamphlets or quotations;
- Forcibly physical touch or molestation
- Physical confinement against one's will and any other act likely to violate one's privacy

Includes any act or conduct by a person in authority denying equal opportunity in pursuit of career development or otherwise making the environment at the work place hostile or intimidating to a person belonging to a different gender.



### **Responsibilities regarding sexual harassment**

All employees of the Company have a personal responsibility to ensure that their behavior is not contrary to this policy.

All employees are encouraged to reinforce the maintenance of work environment free from harassment.



### **Redressal Committee**

For purpose of resolving employee grievances related to sexual harassment defined under this policy, a committee has been constituted of 4 senior employees, of which at least two members are women employees. The present committee members are:

- Director of the company
- Project Manager
- HR Manager
- Module Lead



### **Procedure for Redressal**

Any individual, prior to initiating the redressal procedure, is encouraged to try and resolve any grievance directly with the person/s concerned. It may emerge that the harasser/s do not realize the effect of their actions and may cease to display such behavior if confronted. However, if this is not possible or appropriate, the complainant should follow the procedure detailed below and if required, seek assistance at any stage from the Redressal Committee.

#### ***Step I – Consult with the concerned Project Manager/ HR***

A complainant who has not been able to resolve the grievance directly should approach the concerned Project Manager/ HR. In instances where the grievance involves any of the above individuals, the complainant should refer the matter to the Redressal Committee.

On being approached, the above authorities will address the grievance with a view to resolving it expeditiously, within a maximum duration of one week from receipt of the complaint. This would involve the concerned Manager:

- Carefully listening to the employee's concerns and the outcome desired
- Providing the complainant with a copy of this document explaining the grievance redressal procedure
- Ensuring there is utmost sensitivity and confidentiality maintained in dealing with the issue. This includes the storage of concerned documents and exchange of communication related to the incident.
- Attempting to resolve the matter or refer the matter to Step II of these procedures if unresolved at this level
- Keeping all the members involved, informed about the progress of the matter and
- Monitoring the situation during and after the resolution process

In any action taken, the concerned Manager should ensure procedural fairness for all parties involved, which would normally include such steps as fully informing the respondent of the allegations made against him/her and providing him /her with an opportunity to respond. Upon resolution of the issue, the concerned Manager documents the outcome /decision for records and forwards the same to the Redressal Committee for necessary action as stated in Step III.

### ***Step II – Escalation to the Redressal Committee***

Where the complaint is not satisfactorily resolved at Step I, the complainant or the concerned authority defined in Step I will escalate the matter to the Redressal Committee. The Committee will resolve the matter within two weeks of the escalation, following similar processes outlined in Step I.

### ***Step III***

Based on the merits of the case, the Manager concerned / Redressal committee will communicate the future course of action to the relevant HR. The HR will be responsible to initiate the necessary formalities.



### **Guidelines of resolution**

- Grievances are to be treated seriously and sensitively, having due regard to procedural fairness, confidentiality and privacy. Requirements relating to confidentiality and privacy extend to the use and storage of any information and records related to a grievance.
- Grievances are to be handled quickly and as close as possible to their source.
- Wherever possible, grievances are to be resolved by a process of discussion, co-operation and conciliation. The aim is to reach an acceptable outcome that minimizes any potential detriment to ongoing relationships.
- The individual raising the grievance (the complainant) and the individual against whom the complaint is made (the respondent) should receive appropriate information, support and assistance in resolving the grievance.
- No person is to be victimized for raising a complaint or for being associated with a grievance.

- The Outcome of any Grievance Redressal process will vary from case to case depending on the nature and circumstances of each grievance. The outcomes could include:
  - The complainant gaining a better understanding of the situation and no longer feeling aggrieved
  - The complainant receiving a verbal or written apology;
  - The respondent receiving a verbal or written reprimand;
  - One or both parties agreeing to participate in some form of counselling;
  - Suitable change in Reporting, Team, Role or where required
  - Suitable disciplinary action including termination of employment.
- Disciplinary action may also be taken in instances where:
  - A grievance is found to be malicious or vexatious;
  - A person victimizes another person because of their involvement in the grievance;
  - Unnecessary disclosure of information (a breach of confidentiality) has occurred.



### **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.



### **Access to reports and documents**

All records of complaints, including contents of meetings, results of investigations and other relevant material will be kept confidential by the Company except where disclosure is required under disciplinary or other remedial processes.



### **Protection to Victim**

- The Company is committed to ensuring that no employee who brings forward a harassment concern is subject to any form of reprisal. Any reprisal will be subject to disciplinary action.
- 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.



### **Conclusion**

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