



Policy on Sexual Harassment		
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Integra

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Policy on Sexual Harassment

1. Introduction

Sexual harassment is any unwanted behaviour of a sexual nature committed upon one individual by another. Sexual harassment may be verbal, visual, written, or physical. It can occur between people of different genders or those of the same sex. Harassing behaviours may occur in a variety of relationships including those among peers, and those where there is an imbalance of power between two individuals. This document states the policy of the Company towards sexual harassment involving its employees.

2. Scope

This policy is applicable to all allegations made against an employee, irrespective of whether sexual harassment is alleged to have taken place within or outside Company premises.

3. Objectives

- i. To promote a productive work environment;
- ii. Not to tolerate verbal or physical conduct of a sexual nature by any employee that harasses, disrupts, or interferes with another's work performance or that creates an intimidating, offensive, or hostile environment.

4. What constitutes Sexual Harassment?

- i. Sexual harassment can be defined as unwelcome sexual advances, requests for sexual favours, and other verbal and physical conduct of a sexual nature when:
 - a. Submission to that conduct is made either explicitly or implicitly a term or condition of an individual's employment;
 - b. Submission to or rejection of that conduct by an individual is used as the basis of employment decisions affecting the individual; or
 - c. The conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile, or offensive working environment.
- ii. This conduct includes:
 - a. Unwanted physical contact or conduct of any kind, including sexual flirtations, touching, advances, or propositions;
 - b. Verbal harassment of a sexual nature, such as lewd comments, sexual jokes or references, and offensive personal references;
 - c. Demeaning, insulting, intimidating, or sexually suggestive comments (oral or written) about an individual's personal appearance or electronically transmitted messages;

- d. The display in the workplace of demeaning, insulting, intimidating, or sexually suggestive objects, pictures, or photographs.
- iii. Based on these criteria, sexual harassment typically is categorized into two types:
- a. **"Quid Pro Quo (this for that) Harassment"**: Sexual harassment by managers and supervisors generally is considered "quid pro quo" harassment when it involves the solicitation of sexual favours in exchange for some type of employment decision. To prove quid pro quo harassment, a complaining employee must show that he/she was subject to an unwelcome request for sexual favours by a supervisory employee and that his/her acquiescence to, or rejection of, the request was used as the basis for decisions affecting his/her compensation, terms, conditions, or other privileges of employment. Preferential Treatment also may constitute quid pro quo harassment.
 - b. **"Hostile Work Environment Harassment"**: Harassment by non-supervisory employees generally falls into the category of "hostile environment" sexual harassment rather than "quid pro quo" harassment. Typically, there is no direct link between the offensive conduct and a tangible job benefit or detriment in hostile environment cases. An employer is responsible for hostile environment harassment by non-supervisory employees only if the employer knew or should have known of the harassment and failed to take immediate and appropriate remedial action.
- iv. Sexually harassing or offensive conduct in the workplace, whether committed by supervisors, managers, non-supervisory employees, or non-employees, is prohibited.
- v. Any of the above conduct, or other offensive conduct, directed at individuals because of their race, caste, creed, religion, physical disability, family background, pregnancy or age is also prohibited.

5. Responsibility of the Employee

Any employee who believes that a supervisor's, manager's or other employee's actions or words constitute unwelcome harassment has a responsibility to report or complain about the situation as soon as possible.

6. Compliant Procedure

- i. The report or complaint should be made to the chairperson of the Complaints Committee. The complaint can be made by sending an e-mail to the following id. cpcc@integramicro.com.
- ii. Complaints of harassment will be handled and investigated under the Company's grievance policy, unless special procedures are considered appropriate.
- iii. All complaints of harassment will be investigated promptly as per the Investigation Procedure and in as impartial and confidential a manner as possible.
- iv. Employees are required to cooperate in any investigation.

- v. Each complaint should be resolved within a period of 2 months from the complaint and communicated to the parties involved.
- vi. Any employee utilizing the compliant procedure will be treated courteously.
- vii. A person knowingly making a false claim shall also be subject to disciplinary action.
- viii. Records of all complaints will be maintained by the Chairperson of the complaints committee as per QMS records maintenance procedure.

7. Investigation Procedure

- i. A timely investigation of allegations of sexual harassment is important. A complaining employee or unjustly accused individual also may suffer increasing emotional distress the longer any resolution is delayed.
- ii. **The investigator:** The supervisor or other person receiving the complaint should refer the complaint to the personnel department without delay. The personnel department should choose an investigator. Typically, the investigator should be a human resources professional who is specially trained to conduct sexual harassment investigations. The investigator should be sensitive to the emotional nature of this type of investigation. He should also understand what constitutes sexual harassment under both the employer's policy and the law in order to evaluate the complaint properly. Apart from business relationship, investigators should not have any involvement with the complainant or the alleged harasser.
- iii. **The investigation process:** The process should provide a fair method for both sides to be heard and to receive information. The employer and its investigator should not prejudice the alleged harasser's guilt. Witnesses should be interviewed as soon as possible. All responses should be documented and, if possible, statements should be written and signed by the person providing the information. In addition, all participants in the investigation should be reminded that their cooperation and confidentiality are required.
- iv. **Interviewing the involved parties:** The investigator should be prepared to deal with the complaining employee's embarrassment and anger by patiently, but firmly, explaining that details are needed for an accurate investigation.
 - a. The complaining party should be interviewed first, to ensure that all important details and witnesses are identified promptly.
 - b. It is important for interviewers to be objective and non-judgemental and allow the alleged harasser to respond to each allegation. The investigator also should inform him of the type of disciplinary action that may be taken if the allegations are found to be true.
 - c. Both parties should be told to avoid contact with one another, and ways to minimize contact should be implemented.

- d. The complaining employee should be encouraged to report any further incidents of harassment or retaliation.
 - e. Witnesses should be told as little as possible about the details of the complaint in order to reduce the employer's exposure to later claims of defamation.
 - f. The investigator should recognize that there might be no eyewitnesses. Thus, the employer may have to resolve a sexual harassment claim based on the credibility of the parties.
- v. Records of all investigations and its findings will be maintained by the Chairperson of the complaints committee as per QMS records maintenance procedure.

8. Consequences of Violation of the Policy

Any employee, supervisor, or manager who is found to have violated the harassment policy will be subject to appropriate disciplinary action, up to and including termination. The Company prohibits any form of retaliation against employees for bringing bona fide complaints or providing information about harassment. However, if an investigation of a complaint shows that the complaint or information was false, the individual who provided the false information will be subject to disciplinary action, up to and including termination.

9. Training for Supervisors and Employees

- i. To be effective, a policy against sexual and other harassment must be implemented carefully and should include training for all personnel. The training should identify the types of behaviours that are offensive or prohibited and educate all employees to respond appropriately to harassing situations.
- ii. Training for all employees should include:
 - a. A statement that the employer condemns harassment of any kind, even if it is not explicitly prohibited by the employer's policy or by law;
 - b. The definition of harassment, with particular attention paid to the legal definitions of sexual harassment;
 - c. A description of prohibited conduct, as is provided in the Policy;
 - d. The consequences of violating the policy against harassment, and the types of behaviour that may lead to immediate termination;
 - e. The grievance procedure for handling complaints; and
 - f. Encouragement to report harassment and reassurance that there will not be any retaliation for complaints or reports of harassment.

- iii. In addition to training, all employees should receive a copy of the written policy and any further revisions. Employers also should provide training for all new hires and for those employees who are new to management positions.

10. Training for supervisory personnel

- i. Supervisors and managers play a key role in preventing and eliminating harassment since they are in a position to identify potentially harassing behaviour.
- ii. Training for supervisory personnel should include:
 - a. An awareness of harassment;
 - b. Methods of prevention of harassing behaviour and
 - c. Appropriate responses when an employee complains of harassment.
- iii. However, supervisors and managers can cause severe problems if they engage in any form of harassment themselves. If proved guilty, they will be subject to strict disciplinary action, up to and including termination.

11. The Complaints Committee

The complaints committee and its members are selected for a period of three years. The present committee will be valid from the 1st February 2014 to 31st January 2017. If any member of the committee resigns from the Company or decides to leave the committee, the director of the company will nominate another member to the committee. The term of committee members will expire at the end of the term of the present committee.

Chairperson of the complaints committee: Mrs. Nandini S Shanbhag

Members of the committee:

- 1. Mr. Nagaraja D
- 2. Mr. Selvam P
- 3. Mrs. Girija K A
- 4. Mrs. Deepthi Chintakayala
- 5. Mrs. Seema Nair