

IPE GLOBAL LIMITED, NEW DELHI

PREVENTION OF SEXUAL HARASSMENT POLICY

A. Purpose

The purpose of this policy is to lay down the guidelines for reporting acts of Sexual Harassment at IPE Global Limited and its subsidiaries in India (hereinafter referred to as “the Group”) and to provide the procedure for the resolution and redressal of complaints of Sexual Harassment in line with **The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013**.

B. Scope

This Policy is applicable to IPE Global Limited, India including its subsidiaries in India, namely, IPE Global Centre for Knowledge and Development (IPE CKD) and Imperia Health Private Limited.

The policy is applicable to all the employees (including contractual and support staff), sub-contractors, sub-consultants, interns, temporary/ part-time personnel or any other party(ies). In continuation of the same, this Policy will be applicable within or outside office premises, on project site, in conference/seminar, on study tour, field visit, etc.

Where sexual harassment occurs between third parties on the premises of the Group (for example, between members of third party audit team), the Group will take all steps necessary and reasonable to assist the affected party.

C. References

- i. Guidelines issued by the Hon’ble Supreme Court of India in Vishaka & Others Vs. State of Rajasthan & Others, W.P. (Crl.) Nos. 666-70 of 1992, decided on 13.08.1997 and reported in (1997) 6 SCC 241 (herein after referred to as “Vishaka Guidelines”).
- ii. The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (herein after referred to as “the Act”).
- iii. The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Rules, 2013.

D. Definitions

1. Sexual Harassment:

Sexual Harassment is defined as: “Any unwelcome, sexually determined behaviour (whether directly or by implication) such as:

- Physical contact and advances;
- Demand or request for sexual favours, whether verbal, textual, graphic, electronic or by any other action;
- Sexually coloured remarks;
- Showing pornography; or
- Any other unwelcome physical, verbal or non-verbal conduct of sexual nature.

The following circumstances if it occurs or is present in relation to or connected with any act or behaviour of sexual harassment may amount to sexual harassment:

- implied or explicit promise of preferential treatment in employment ; or
- implied or explicit threat of detrimental treatment in employment; or
- implied or explicit threat about present or future employment status; or
- interference with work or creating intimidating or offensive or hostile work environment; or
- humiliating treatment likely to affect health and safety.

In addition, the following conduct construes Sexual Harassment

- **Verbal harassment**, e.g., epithets, derogatory comments, slurs, kidding, teasing, jokes commenting about another's body or appearance, offensive sexual flirtations, sexual advances or propositions, gender based comments and ridicule, inquiries into one's sexual experiences, discussion of one's sexual activities, threats, insults, name calling, whistles or catcalls, sexually explicit or offensive language.
- **Physical harassment**, e.g., assault, stalking, staring, trick or horse play, impeding or blocking movement, physical contact such as patting, pinching, hugging or brushing against another's body.
- **Visual and nonverbal forms of harassment**, e.g., derogatory posters, sexually oriented cartoons or drawings, the display of sexually suggestive objects or pictures, such as calendars and screen savers, or demeaning graffiti, demeaning or sexually suggestive gestures.

2. Consensual Relationships

A romantic, intimate or sexual relationship between two people with mutual consent is termed as Consensual Relationship.

To ensure that the consensual relationship does not adversely impact the Group, employees who are into such relationship must comply with all of the following:

- Notify Head - Human Resources (HR) immediately through email;
- Accept reassignment of roles and responsibilities in case it is essential;
- Ensure that there is no public display of affection in workplace;
- Ensure that they are not part of any decision making process for each other.

Conversely, a supervisor who engages in consensual relationships may be liable for formal disciplinary action and will be held accountable for unprofessional behavior. Moreover, other staff can be affected by such behavior as it possibly places the staff member in a position of favor at the expense of others and implicitly makes obtaining benefits contingent on sexual favors.

A supervisor who is not in a supervisory position over an employee must be aware of the possibility that they may be placed in a supervisory position over the employee with whom they have a consensual relationship.

3. Internal Complaints Committee (ICC)

In accordance with **The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013**, the Group has constituted Internal Complaints Committee (ICC) for managing the process of investigations and redressal of sexual harassment complaints. The constitution and roles & responsibilities of ICC is given in Annexure A.

E. Roles and Responsibilities

i. Employees

It is the responsibility of the employees to:

- a. Refrain from committing any acts which amount to sexual harassment at the workplace;
- b. Report incidents of sexual harassment without fear or favour;
- c. Create a conducive environment for co-workers to work together without fear of harassment;
- d. When in doubt, seek clarifications from Head – Human Resources (HR).

ii. Department/ Practice Heads

- a. Ensure that there is no hostile working environment in the work place;

- b. Report any complaint or grievance received, immediately to the concerned authorities;
- c. Ensure that no victimisation of the aggrieved party happens at the workplace where the supposed action is to have taken place;
- d. Ensure that issues pertaining to sexual harassment are discussed periodically during the meetings. During such meetings, relevant details such as the brief outline of this Policy, the details of the members of the Complaints Committee shall also be discussed.

iii. Head – Human Resources (HR)

- a. Conduct necessary communication and training across the company, with respect to this Policy at the workplace;
- b. Ensure this policy is communicated, explained and handed over at the time of orientation of every employee;
- c. Any act of sexual harassment to be notified as misconduct under the Code of Conduct of the company;
- d. Provide sufficient security at the entry as well as the exit points and in cases where employees are transported to their home from workplace working during late hours;
- e. Provide separate rest room facilities for female employees;
- f. Maintain records of all the Sexual Harassment cases and findings.

F. Policy

The Group is committed to creating a healthy working environment that enables employees to work without fear of prejudice, gender bias and sexual harassment. Consistent with its commitment to foster an environment of mutual respect and dignity of all its employees, any act of inappropriate behaviour of a sexual nature and/ or retaliation will not be tolerated at the Group.

Any personnel, especially a person in authority must be sensitive to acts of conduct which may be considered offensive by fellow personnel and must refrain from engaging in such conduct.

The Group will not, under any circumstances, condone or tolerate conduct which may constitute sexual harassment on the part of its management, supervisors or non-management personnel.

The Group abides by the ‘Vishakha Guidelines’ and ‘The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act 2013’, ensuring protection against sexual harassment of any personnel irrespective of the gender/ sexual orientation.

G. Procedure for Filing Complaints

Any employee or personnel of the Group who feels and is being sexually harassed directly or indirectly may submit a complaint of the alleged incident to any member of the Internal Complaints Committee (ICC) in writing with his/her signature (with date) within 90 days of occurrence of incident.

A complaint must specify the nature of the charge. The charge should include date and time of specific event(s), names of witnesses, and any evidence that support the allegation(s). In addition, it should include the contact details of the aggrieved party such as address, contact number, department and name(s) of alleged harasser, etc.

Where the complaint has been submitted with Head – HR/ MD/ Department Head, the same will be duly forwarded to ICC for investigations.

H. Redressal of Complaint

- i. Before initiating inquiry into alleged complaint, at the discretion of aggrieved party, ICC may, take steps to resolve the matter between the aggrieved party and respondent, through conciliation.

- ii. Where the settlement has been arrived as per point (i) above, no further inquiry shall be conducted by ICC. ICC shall record the details of settlement so arrived and forward the same to Head - HR for necessary action as specified in the recommendation.
- iii. Subject to point (i) above, if the complaint has not been resolved through conciliation, ICC may proceed to initiate inquiry into the complaint. The inquiry shall be completed within a period of 90 days.
- iv. During the pendency of the inquiry, on a written request made by the aggrieved party, ICC may recommend management of the Group through Head – HR to transfer the aggrieved party or respondent to other department/ practice.
- v. If, in the course of the proceedings, ICC is satisfied that *a prima facie* case of sexual harassment is made out against the respondent(s), then it may, in the interests of justice, on the request of the aggrieved party or otherwise, recommend Head – HR to transfer such employee(s) from their present position or suspend, pending inquiry.
- vi. ICC may direct the aggrieved party to submit additional documents if the written complaint requires further particulars.
- vii. A copy of the complaint will be forwarded to alleged harasser (respondent) and ICC shall direct the respondent(s) to submit a written response to the complaint/ allegations within time period decided by ICC.
- viii. ICC shall conduct the proceedings in accordance with the principles of natural justice and in line with the Act and this Policy. It shall allow both parties reasonable opportunity of presenting their case. Documents produced by either party shall be affixed with that party's signature to certify the document as original/ true copy (as appropriate).
- ix. Should the respondent choose not to participate in the proceedings, ICC shall continue the inquiry, *ex parte*.
- x. Minutes of all proceedings of each sitting of ICC shall be prepared and duly signed by the members of the Committee. The same shall be maintained by Head – HR.
- xi. ICC shall record the conclusion of its findings in writing supported with explanations & recommendations and shall forward the same to Head - HR within a period of 10 days from date of completion of inquiry. In case ICC finds that *prima facie* criminal case exists, the same shall be specifically mentioned in the ICC's report.
- xii. If the ICC arrives at the conclusion that allegation against the respondent has been proved, it shall recommend the management of the Group through Head – HR, to take action against the respondent for sexual harassment as a misconduct in accordance with Disciplinary Policy of the Group (also refer Annexure B of this Policy).
- xiii. If the ICC arrives at the conclusion that allegation against the respondent has not been proved, it shall recommend the management of the Group that no action is required to be taken in the matter.
- xiv. In continuation of point (xiii) above, if ICC arrives at conclusion that allegation made against the respondent is malicious and/ or made with a false intent and/or aggrieved party has produced false/ misleading document, ICC may recommend the management of the Group through Head – HR to take action against the aggrieved party in accordance with Disciplinary Policy of the Group (also refer Annexure B of this Policy).
- xv. If, in the course of the proceedings, the Committee finds that any person/respondent has victimised the aggrieved party and/or person assisting the aggrieved party, the Committee shall

record the same in writing, with a recommendation to management of the Group through Head - HR to take disciplinary action against such person(s).

I. Confidentiality

Given the sensitive nature of cases of sexual harassment and their impact on the victim as well as the person against whom such allegations are levelled, the Group is committed to maintaining strict confidentiality in relation to such complaints and the resultant inquiry.

All proceedings, including the statements and other material adduced as evidence before the Committee shall be strictly confidential and the members shall not divulge the details to any other Employee within the Group or to any person outside the Group. This includes Minutes of the Meeting of the Committee, findings, recommendations, decisions of the Committees and any document or any verbal communication. Also, to other Employees involved in such discussions, the members should emphasise the necessity for confidentiality and the consequences of possible disciplinary action in case of transgression.

J. Protection Against Victimisation/ Retaliatory Action

The Group will not tolerate any attempt to deter anyone from submitting sexual harassment complaint or incidents of repercussions/ victimisation against anyone who assists with an investigation even when allegations are found to be unsubstantiated. Any employee of the Group who retaliates against another employee in violation of this Policy is subject to disciplinary action, upto and including termination. ICC shall make the best efforts to protect the interests of the victim from victimisation.

K. Miscellaneous

- i. The decision of ICC on the matter within its competence shall be considered final and binding on both aggrieved party and respondent.
- ii. Head – HR shall scrutinise the report submitted by ICC and take appropriate action against the guilty person in accordance with the recommendations and gravity of the conduct disclosed in the report within a period of 60 days.
- iii. In case ICC records in its report that the conduct is of criminal nature, appropriate action shall be initiated as per the law of land.
- iv. The Group will provide the aggrieved party with necessary psychological, emotional and physical support, on request.

ANNEXURE A**Internal Complaints Committee (ICC)**

The management of the Group has established an Internal Complaints Committee (ICC) for investigation of Sexual Harassment situations. The core members of ICC are given below:

Core Committee Members	Role	Contact Details
Ms. Kavita Fadnis (Vice President – Human Resources)	Chairperson	<i>Mobile:</i> +91 9958003076 <i>Email:</i> kfadnis@ipeglobal.com
Ms. Tanya Singh (Advisor – Corporate Communication & Quality Assurance)	Member	<i>Mobile:</i> +91 9810290211 <i>Email:</i> tsingh@ipeglobal.com
Dr. (Ms.) Renu Khosla (Director, CURE)	Member	<i>Mobile:</i> +91 9818198612 <i>Email:</i> renukhosla@cureindia.org
Mr. Sudarshan Panda (Vice President – Corporate Risk & Compliance)	Member	<i>Mobile:</i> +91 9650544955 <i>Email:</i> spanda@ipeglobal.com
Ms. Promila Bishnoi (Associate Director – Economic and Public Financial Management)	Member	<i>Mobile:</i> +91 9910188960 <i>Email:</i> pbishnoi@ipeglobal.com
Mr. Gurmeet Singh Kochhar (Sr. Manager – Quality Assurance)	Member	<i>Mobile:</i> +91 9711080786 <i>Email:</i> gskochhar@ipeglobal.com
Ms. Prasanna Gettu CEO, The International Foundation for Crime Prevention and Victim Care, Chennai	External Member	<i>Mobile:</i> +91 9841061184 <i>Email:</i> pcvc2000@yahoo.com
State	State Representatives	Contact Details
West Bengal	Ms. Debjani Chaudhuri (Managing Consultant)	<i>Mobile:</i> +91 9831080139 <i>Email:</i> dchaudhuri@ipeglobal.com
Uttar Pradesh	Mr. Prashant Agarwal (Associate Director)	<i>Mobile:</i> +91 9935390152 <i>Email:</i> pagarwal@ipeglobal.com
Himachal Pradesh	Mr. Sunil Koul (Principal Consultant)	<i>Mobile:</i> +91 9810661652 <i>Email:</i> skoul@ipeglobal.com
Bihar, Karnataka, Jharkhand or any other office/project location in India	Core Committee members will govern	Refer above.

The Committee may seek the advice of any NGO or third party who it feels will be able to provide special assistance to the Committee in dealing with such issues.

Role of ICC

- i. To decide whether the facts contained in the complaint make out a case of “sexual harassment” in light of the definition contained in the Policy;
- ii. To look into the truth of the allegations contained in the complaint;
- iii. To summon witness/ documents;
- iv. To look into any allegation of victimisation of the aggrieved party or any other person assisting the aggrieved party as a result of such complaint having been made or such assistance having been provided;
- v. To recommend the penalties/ action as per Disciplinary Policy of the Company, to Head – HR;
- vi. To recommend transfer/ suspension, to Head – HR;
- vii. To monitor the follow-up action to be taken by Head – HR on recommendations of ICC.

ANNEXURE B**Possible Disciplinary Actions**

- i. Permanent transfer or suspension without pay, or both.
- ii. Fine equivalent to 2 months' salary that can be credited to Employee Welfare Fund created to be utilised for welfare of employees.
- iii. Stoppage of increment with or without cumulative effect.
- iv. Reduction in level.
- v. Termination/ dismissal from the services of the Group.
- vi. Any other action based on Disciplinary Policy.

DECLARATION

I hereby declare that I have received, read and understood IPE Global's Prevention of Sexual Harassment Policy and I agree to abide by it. I will contact Human Resources Department if I have any questions about this Policy.

A copy of this Declaration will be placed in my personnel file.

Signature :

Name :

Department :

Designation :

Date :

Place :