

Prevention of Sexual Harassment at Workplace

1. Objective & Commitment

G Square is committed to create and maintain safe work environment, free from sexual harassment & discrimination for all its employees. As per the guidelines of “The Sexual Harassment of Women at Workplace (Prevention, Prohibition & Redressal) Act, 2013”. G Square will operate on a zero-tolerance policy when it comes to Sexual Harassment at the Workplace and treat all incidents of such nature seriously and promptly investigate all allegations of Sexual harassment.

2. Scope:

This policy is applicable to all our employees whether full time, consultant and in probation.

3. Key areas covered by the policy:

A. Internal Complaints Committee:

The Internal Complaints Committee shall comprise of:

- a) A Presiding Officer – senior level women employee at workplace
- b) Not less than 2 (two) members from amongst Employees preferably committed to the cause of women or who have had experience in social work or have legal knowledge; and
- c) One member from amongst non-governmental organization or associations committed to the cause of women or a person familiar with the issues relating to sexual harassment.

B. The committee will be responsible for:

- a) Receiving complaints of sexual harassment at the workplace
- b) Initiating and conducting inquiry as per the established procedure
- c) Submitting findings and recommendations of inquiries
- d) Coordinating with the employer in implementing appropriate action 5. Maintaining strict confidentiality throughout the process as per established guidelines.
- e) Submitting annual reports in the prescribed format

C. POSH Committee

Ms. Latha Aranganathan
(Chief Marketing Officer)
President of POSH Committee

Mr.Sundaraman
(Sr. Vice President)
Member of POSH Committee

Mr.Solaiyappan
(Vice president)
Member of POSH Committee

MS. BANUMATHI RANATHIVE
(SENIOR MANAGER)
MEMBER OF POSH COMMITTEE

Ms. Divyanshi Sethu
(Certified POSH trainer)
External member

D. Internal Complaints Committee will operate on the following guidelines: -

- a) The person against whom the allegation of Sexual Harassment has been made, Complaints Committee shall meet as and when any instance of violation of the policy is referred to the committee and in any case at least once in a year.
- b) Internal Complaints Committee shall prepare the annual report and submit the report pertaining to number of cases filed and their disposal under the act to the company management
- c) The Presiding Officer and the members of the Internal Complaints Committee will hold the position up to three years from the date of their nomination.

E. Functioning of Committee

✓ **Lodging a Complaint:**

- i. The Aggrieved Woman makes a complaint directly to the Presiding Officer of the Internal Complaints Committee. The Presiding Officer should be able to try & solve the grievance informally before escalating the matter to the formal Committee within a period of three months from the date of incident.
- ii. Where an Aggrieved Woman is unable to make a complaint on account of her physical incapacity, a complaint may be filed by (a) her relative or friend, or (b) her co-worker, (c) an officer of the National or State Commission for Women, or (d) any person who has knowledge of the incident, with the written consent of the Aggrieved Women.
- iii. Where an Aggrieved Women is unable to make a complaint on account of her mental incapacity, a complaint may be filed by (a) her relative or friend, or (b) a special educator, or (c) a qualified psychiatrist or psychologist, (d) the guardian, or (e) any person who has knowledge of the incident jointly with any of the persons mentioned in (i) to (iv) of this paragraph.

- iv. Where an Aggrieved Women, for any other reason, is unable to make a complaint, a complaint may be filed by any person who has knowledge of the incident, with the written consent of the Aggrieved Women.
- v. The Internal Complaints Committee may, for the reasons to be recorded in writing, extend the time limit, if it is satisfied that there were unavoidable circumstances which prevented the aggrieved woman from filing a complaint within the said period. Such complaint shall contain all the material and relevant details concerning the alleged Sexual Harassment including the name of the contravener. The information disclosed by such complainant should be treated as confidential information by the members of the Internal Committee.
- vi. If the Aggrieved Woman would like to initiate action under the Indian Penal Code, 1860 ("IPC"), she may inform the G Square management of the same, and the management will provide necessary assistance to the Aggrieved Woman to file the complaint in relation to the offence under the IPC. B

Conciliation: The Internal Complaints Committee may, before initiating an inquiry, at the request of the complainant take steps to settle the matter between her and the Respondent through conciliation. However, no monetary settlement shall be made the basis of the conciliation. Where a settlement has been arrived at as mentioned above, the Internal Complaints Committee shall record the settlement so arrived at and forward the same to the management to take action as specified in the recommendation and shall provide copies of the settlement to the complainant and the respondent.

✓ **Inquiry into Complaint:**

The Internal Complaints Committee shall proceed to make inquiry into the complaint in accordance with the provisions of the service rules applicable. Such an inquiry (with due conciliation as appropriate) shall be completed within a period of three months. The Internal Complaints Committee shall proceed to make an inquiry into the complaint in accordance with the principles of natural justice and further during the course of inquiry provide an opportunity of being heard to the complainant and the Respondent and the relevant witnesses provided by the complainant and the Respondent.

✓ **Inquiry Report:**

On the completion of such inquiry, the internal committee shall provide the report of its findings to the Head HR & COO within a period of 10 days from the date of completion of enquiry and such report be made available to the concerned parties. The Head of Human Resources & COO shall act upon the recommendation within 60 days of its receipt. In the event that the Internal Complaints Committee

arrives at the conclusion that there is no case for Sexual Harassment, then the complaint may be dropped by the Internal Complaints Committee, and it shall notify the management of G Square of the same.

✓ **Penalties to Respondent:**

If the sexual harassment complaint is proved prima-facie right to the Internal Complaints Committee based on the material and/or witness verified by them, then the Committee will recommend to the Head of HR & COO punishment to the respondent in terms of:

- Warning in writing
- Immediate suspension from the services
- Immediate termination
- May immediately refer the case based on the gravity and merits of the case to the local police/judiciary

✓ **Punishment for false complaints:**

Where the Internal Complaints Committee arrives at a conclusion during or after the inquiry that the allegation against the respondent is either malicious or false, appropriate punitive action may be taken by the Head of Human Resources & COO as per service rules applicable on recommendations of the committee.

✓ **Confidentiality**

Not with standing anything contained in the Right to Information Act, 2005, contents of the complaint, the identity and addresses of the Aggrieved Woman, Respondent and witnesses, any information relating to conciliation and inquiry proceedings, recommendations of the Internal Complaints Committee and the action taken by G Square shall not be published, communicated or made known to the public, press and proceedings media in any manner.

✓ **The management assurance:-**

- a) Express prohibition of sexual harassment will be notified and circulated.
- b) Prohibition of sexual harassment is included in the Service and Conduct rules of the company.
- c) Complainants or witnesses will not be victimised or discriminated against while dealing with complaints.

Details	Name	Designation	Date	Signature
Prepared	BANUMATHI R	HRBP		
Reviewed	RAMESH P R	Human Resource Head		
Approved	JUNAITH BABU	COO		