

PREVENTION OF SEXUAL HARASSMENT POLICY

1.0 INTRODUCTION

- The policy is intended to provide guidelines for behavior in the office so as to enable the employees to work in a conducive environment free from sexual harassment.

1.1 OBJECTIVE

- To prohibit, prevent or deter the commission of acts of sexual harassment at workplace
- To provide guidelines for reporting and mitigation of any harassment including sexual harassment

1.2 SCOPE

- The policy is applicable to all employees, workers & trainees of the company.
- The policy shall be applicable to all allegations of sexual harassment made by an Employee / external party or against an Employee / external party, irrespective of whether the harassment is alleged to have taken place within or outside the Company premises while performing duties.

1.3 SEXUAL HARASSMENT

- Sexual harassment includes such unwelcome sexually determined behavior (whether directly or by implication) as :
 - (a) physical contact and advances ;
 - (b) a demand or request for sexual favours ;
 - (c) sexually coloured remarks ;
 - (d) showing pornography ;
 - (e) any other unwelcome physical, verbal or non-verbal conduct of sexual nature.
 - (f) A person or authority usually the superior of the victim, demands sexual favours for getting or keeping a job benefit and threatens to fire the employee if the conditions are not met.

Guidelines

- No person shall indulge or caused to be indulged in sexual harassment of co-workers. However, an employee who is sexually harassed can complain about the same even if there is no adverse consequence.
- A hostile work environment arises when a co-worker or supervisor creates the workplace atmosphere which is intimidating, offensive or humiliating and experienced as an attack on personal dignity. For example an employee tells offensive jokes.
- The violators of this policy will be subject to disciplinary action, which may include immediate termination.
- It is the obligation of all employees to report sexual harassment experienced by them personally.

- The policy is kept on WIL intranet portal under HR category. All employees are requested to read the policy and abide by the policy.

1.3.1 EMPLOYER'S RESPONSIBILITY

- All reporting officers and supervisors and the HR Department are responsible for ensuring that the workplace is free from sexual harassment.
 - ▶ Take preventive action
 - ♦ Division Heads are required to discuss the policy at employee meetings and make sure that all employees and supervisory staff are aware of what action to take if harassment occurs.
 - ♦ Supervisors / Division Heads must also set the appropriate standard of conduct through their own behavior.
 - ▶ When approached by an employee with a complaint
 - ♦ Reporting officers must be supportive and explain what options are available and how to contact the Ethics Counselor / HR Department.
 - ♦ Reporting officers should also find out how the employee prefers to deal with the situation and address any concerns the employee may have about filing a formal complaint.
 - ♦ Finally, Reporting officers must keep a confidential record of all pertinent information, and inform the HR department at the earliest.
 - ▶ If the employee files a formal complaint
 - ♦ Ethics Counselor must guide the employee on the complaint resolution process as required and be available to discuss any concerns that the employee may have.
 - ♦ Cooperate in any investigations that may be initiated
 - ▶ If the employee chooses not to file a formal complaint
 - ♦ Reporting officers must explain to the employee that they are required under the policy to take action even in the absence of a formal complaint.
 - ♦ If the allegation is a very minor form of harassment, it may be appropriate to resolve the situation informally. Before proceeding, Reporting officers must confirm their assessment by consulting with Ethics Counselor.

1.3.2 PROCEDURE FOR COMPLAINT

- The concerned employee shall give his complaint in writing to the Ethics Counselor giving details of the incident or may informally lodge the complaint verbally.
- The Ethics Counselor after initially scrutiny will forward the complaint to Compliance Committee for further investigation and action.
- Once the complaint is received, it will be kept strictly confidential.

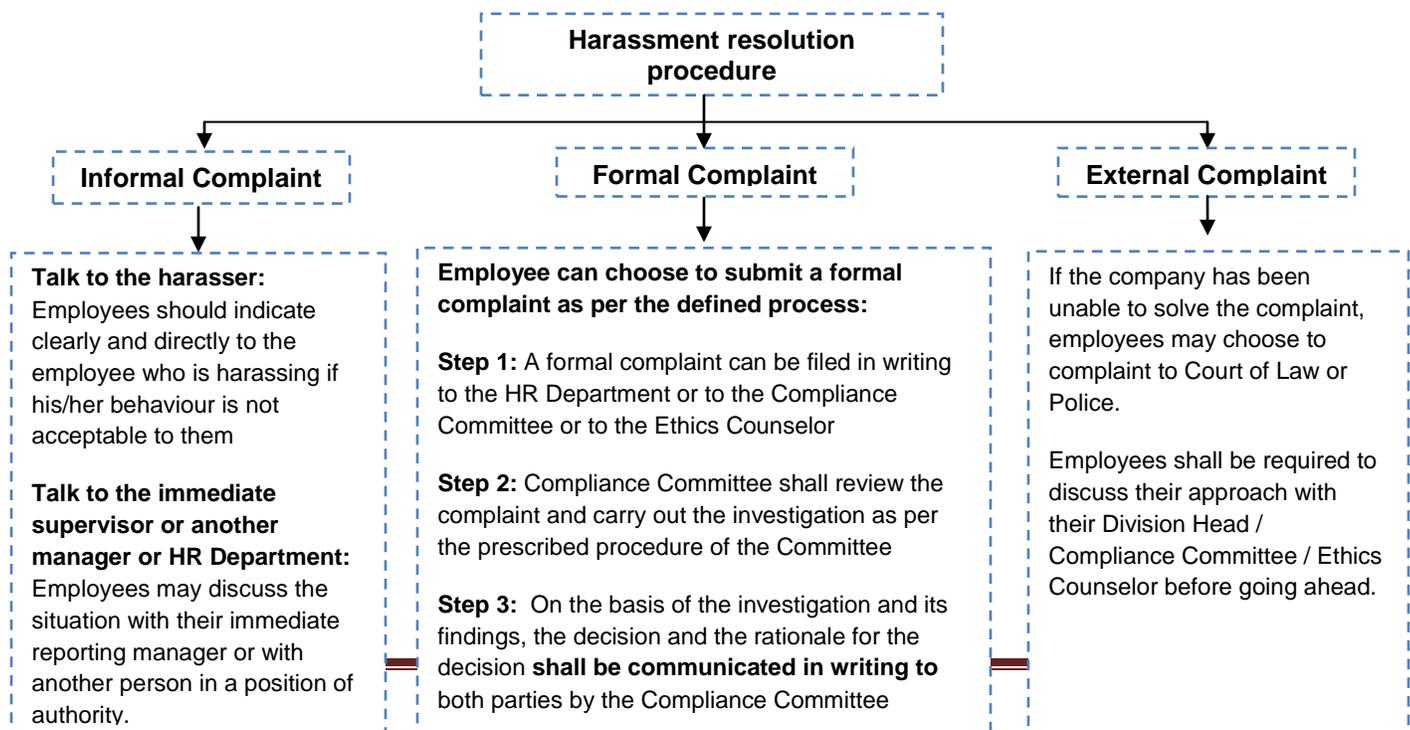
- The person accused will be informed that a complaint has been filed against him/her and no unfair acts of retaliation or unethical action will be tolerated.

1.3.3 **THE COMPLIANCE COMMITTEE & ETHICS COUNELLOR**

Company has formed a Compliance Committee and has appointed Ethics Counselors. Separate notification is being issued to communicate members of Compliance Committee and Ethics Counselors.

1.3.4 **RESOLUTION IN CASE OF ANY COMPLANITS**

- The company is responsible for preventing harassment at workplace, for taking immediate corrective action and for promptly investigating any complaint filed in this regard.
- In case of such an event, the company request its employee's to contact the Ethics Counselor who shall be responsible for taking the appropriate actions.
- The Compliance Committee shall ensure that a fair and just investigation is undertaken immediately.
- Both the complainant and the accused initially will be questioned separately with a view to ascertain the veracity of their contentions. If required, the person who has been named as a witness will need to provide the necessary information to assist in resolving the matter satisfactorily.
- The complainant and the accused shall be informed of the outcome of the investigation.
- The investigation shall be completed within 3 months of the receipt of the complaint.
- If the investigation reveals that the complainant has been sexually harassed as claimed, the accused will be disciplined accordingly.



1.3.5 Disciplinary Action

Where any misconduct is found by the Committee, appropriate disciplinary action shall be recommended against the accused. Disciplinary action may include transfer, withholding promotion, suspension or even dismissal. This action shall be in addition to any legal recourse sought by the complainant.

1.3.6 Confidentiality

All information received shall be kept confidential. Any person (including witnesses) who breaches confidentiality shall be subject to disciplinary action.

1.3.7 Protection against retaliation

Regardless of the outcome of the complaint made in good faith, the employee lodging the complaint and any person providing information or any witness, will be protected from any form of retaliation. While dealing with Compliance of sexual harassment, the Committee shall ensure that the Complainant or the witness are not victimized or discriminated against by the accused. Any unwarranted pressures, retaliatory or any other type of unethical behavior from the accused against the complainant while the investigation is in progress should be reported by the complainant to the Compliance Committee as soon as possible. Disciplinary action will be taken by the Compliance Committee against any such Compliance which are found genuine.

1.3.8 Documentation

The Committee shall keep complete and accurate documentation of the complaint, its investigation and the final report thereof. The report should include investigation, facts, findings and recommendation. The incident would be documented in both the complainant's and the accused's files with the full report of the Compliance Committee.

1.3.9 Dissemination of the Policy

A copy of this Policy shall be emailed to all employees and also will be made available in the intranet portal enabling employees to read the policy at their convenience.

1.3.10 Compliance made with a malicious intent

This policy has been evolved as a tool to ensure that in the interest of justice and fair play, our employees have a forum to approach in the event of instances of sexual harassment. However, if on investigation it is revealed that the complaint was made with a malicious intent and with the motive of maligning the concerned individual / tarnishing his/her image in the company and to settle personal/professional scores, strict action will be taken against the complainant.

1.3.11 Rights of Legal Remedies

The employees who are victims of sexual harassment may, in addition to the above, seek legal remedies as may be provided under the various laws for the time being in force. Compliance Committee will provide necessary support for the further proceedings.