

Title: Sexual Harassment Guidelines	HR Guidelines Version: New
Department: Human Resources	Effective Date: 1.4.2014
Proposed by: VP-HR	Approved by: CMD

Objective

To provide an environment free from harassment for any reason, whether because of age, race, color, religion, gender, creed, national origin, disability, or any other factor, especially sex. Sexual harassment violates an individual's fundamental rights and personal dignity, is unlawful, and will not be tolerated by the company. The ROH considers sexual harassment in all its forms to be a serious offense.

Definition

Sexual harassment is unwanted sexual attention of a persistent or offensive nature made by a person. Sexual harassment includes sexually oriented conduct that interferes with an employee's job performance and creates an intimidating, hostile, or offensive working environment. While sexual harassment encompasses a wide range of conduct, some examples of specifically prohibited conduct include the following points:

i) Sexual Harassment

All employees are responsible for assuring that the workplace is free from sexual harassment. Company strongly disapprove of offensive or inappropriate sexual behavior at work, therefore, all employees must avoid any action or conduct which could be viewed as sexual harassment, including, but not limited to:

- a. Unwelcome sexual advances;
- b. Requests for sexual acts or favors;
- c. Granting or denying job benefits based on receptivity to sexual advances;
- d. Other verbal or physical conduct of a sexually harassing nature that has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile or offensive working environment.

ii) Other Unlawful Harassment

- e. Making or threatening reprisals after a negative response to sexual advances.
- f. Visual conduct that includes leering, making sexual gestures, or displaying of sexually suggestive objects or pictures, cartoons or posters.
- g. Verbal conduct that includes making or using derogatory comments, epithets, slurs, or jokes.
- h. Verbal sexual advances or propositions.
- i. Verbal abuse of a sexual nature, graphic verbal commentaries about an individual's body, sexually degrading words used to describe an individual, or suggestive or obscene letters, notes, or invitations.
- j. Physical conduct that includes touching, assaulting, or impeding or blocking movements.

Complaint

Any employee who has a complaint of sexual harassment at work by anyone, including supervisors, co-workers or visitors (customers) must bring the problem to the attention of their supervisor, manager, HR Manager, General Manager. In certain instances, if the employee is uncomfortable addressing the complaint at Unit level may approach directly VP-HR or Senior Management at Corporate office.

All allegations of sexual harassment will be quickly and discreetly investigated. To the extent possible, employee confidentiality and the confidentiality of any witnesses and the alleged harasser will be protected against unnecessary disclosure. When the investigation is completed, employee will be informed of the outcome of the investigation.

Redressal Process

Complaints relating to Sexual Harassment and other unlawful harassment or related issues should be reported to the HR Manager of the concerned location.

All complaints will be promptly and carefully investigated by the Sexual Harassment & Prevention Committee. The committee shall comprise of HR Manager, women employees and shall include a woman from any non-Governmental Organization working for the cause of women. The committee shall conduct enquiry on the complaint received. All employees are assured they will be free of any and all reprisal or retaliation from filing such complaints

An administrative investigation will include interviews with all relevant persons, including the complainant, the accused and other potential witnesses. In determining whether alleged conduct constitutes sexual harassment, the record as a whole and the totality of the circumstances, such as the nature of sexual advances and the context in which the alleged incidents occurred will be examined. A determination of appropriate action will be made from the facts, on a case-by-case basis.

The administration will review the finding with the complainant at the conclusion of its investigation. If the investigation reveals that the complaint appears to be valid, immediate and appropriate corrective action, up to and including discharge will be taken to stop the harassment and prevent its reoccurrence.

If the validity of the complaint cannot be determined, immediate and appropriate action will be taken to assure all parties are reacquainted with the sexual harassment policy and to avoid sexual harassment in the future.

All employees should be aware that the privacy of the charging party and person accused of sexual harassment or other unlawful harassment would be kept strictly confidential.

In case the complainant is not satisfied with the action taken by Complaint officer or HR Manager, the complaint should be escalated directly to Sexual Harassment & Prevention Committee / VP-HR, Senior Management / Board of Directors Committee for redressal.

Prevention

Prevention is the best tool for the elimination of sexual harassment and other lawful harassment. The company administration express strong disapproval of any acts that can be construed as an act of sexual harassment of any employee or stakeholders (This includes inappropriate jokes, displays of posters, etc.)

Resolution

Employees often can stop or prevent sexual harassment by immediately and directly expressing their disapproval of an individual's sexually oriented attention or conduct. In many cases, an informal warning by the HR Manager to an alleged harasser, combined with appropriate follow-up supervision and monitoring of the employee's behavior might be sufficient to prevent or stop sexual harassment.

If this approach does not stop the harassment, a thorough and impartial investigation of all complaints will be conducted in a timely and appropriate manner. The investigation will be conducted again by employee's immediate supervisor or any competent authority. Any employee; who has been found to have sexually harassed another employee or visitor/patron will be subject to disciplinary action up to and including termination.

Confidentiality

All inquiries, complaints and investigations are treated confidentially. Information is revealed strictly on a need-to-know basis. However, the identity of the complainant usually is revealed to the accused and witnesses. All individuals contacted in connection with a complaint will be counseled that any information pertaining to the complaint shall be held in confidence.

Note: Management has the discretion to review the guidelines from time to time.