



KELLTON TECH

Kellton Tech Solutions Ltd.

**Policy for Prevention of Sexual
Harassment at Workplace**

HR, Issue 1.0



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We, at Kellton Tech Solutions Ltd. (hereinafter known as the Company), follow the philosophy of respecting the dignity of all individuals, gender diversity and equal opportunity for all. Sexual harassment at work is an affront to, and seriously undermines the dignity of the victim and Company's work ethics. All employees should, accordingly, note that the Company has zero tolerance on incidence related to sexual harassment at work. The policy lays down the rules and the procedure to deal with any incidents of such nature.

OBJECTIVE

The main objective of having this Policy Document is to establish a complaint resolution policy and procedure to effectively combat and prevent sexual harassment at work and to resolve complaints against such conduct in a fair and timely manner.

SCOPE

This Policy will be applicable to all allegations of Sexual Harassment made by an Employee / third party who is associated with the company for professional reasons against an Employee / third party who is associated with the company for professional reasons, irrespective of whether Sexual Harassment is alleged to have taken place within or outside the Company premises.



DEFINITIONS

Definition of Sexual Harassment

The Supreme Court has defined the term sexual harassment as:

“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 favors;
- (c) Sexually-colored remarks;
- (d) Showing pornography;
- (e) Any other unwelcome physical, verbal or non-verbal conduct of sexual nature.

Types of Sexual Harassment:

Sexual Blackmail (quid pro quo harassment)

Quid pro quo harassment postulates that the victim has suffered some tangible economic detriment for rejecting a sexual overture or demand, as for instance denial of promotion, dismissal or forced resignation.

Hostile Environment Harassment.

On the other hand, in hostile environment harassment the victim may not suffer any tangible economic detriment. However, the harassing conduct is severe or pervasive and thus has the purpose or effect of creating an intimidating, hostile, or offensive working environment for the victim. Such



work environment effectively makes the victim's willingness to endure the harassment a term or condition of the victim's employment.

COMPLAINT REDRESSAL COMMITTEE

A rotating committee has been constituted by the Management to consider and redress complaints of Sexual Harassment. The members to the committee could change for reasons related to discontinuance with the Company. The Chairman and Members of the existing Committee members are attached in **Annexure 1**. The same would be updated as and when the members leave and the new committee members are appointed.

REDRESSAL PROCESS

The complainant can write to any of the members of the Committee to bring to the notice the specific complaint. It is clarified that until the victim agrees to file a formal complaint, this communication will not be treated as a formal complaint.

Also, a formal procedure has been laid down which is as follows:

- Any Employee ("Complainant") may lodge a complaint of Sexual Harassment ("Complaint") against an Employee / third party ("Accused") or vice versa, with any of the members of the Panel at the earliest point of time and in any case preferably within 10 days from the date of occurrence of the alleged incident.
- Such a Complaint should be in writing with his/her signature.



- The Complaints Committee will hold a meeting with the Complainant latest within a period of 10 (ten) days within the receipt of the complaint and advance intimation will be given to the Complainant of the same.
- The Complaint Committee shall at all times be headed by a woman and not less than half of its members shall be women and would include a third party member who is either an NGO or is an independent individual well versed with the issue of sexual harassment at workplace.
- At the first meeting, the Committee members shall hear the Complainant and record her/his allegations. The Complainant can also submit any corroborative material with a documentary proof, oral or written material, etc., to substantiate his / her complaint. If the Complainant does not wish to depose personally due to embarrassment of narration of event, a lady officer for lady employees involved and a male officer for male employees, involved shall meet and record the statement.
- Thereafter, the person against whom complaint is made may be called for a deposition before the Committee and an opportunity will be given to him / her to give an explanation, where after, an "Enquiry" shall be conducted and concluded.

**PROCEDURE FOR ENQUIRY**

- The Complaint's Committee shall immediately proceed with the Enquiry and communicate the same to the Complainant and the Accused.
- The Complaints Committee shall record all the proceedings of the Enquiry and all parties present at any of the communication meetings, shall endorse the same in token of authenticity thereof.
- The Committee shall prepare and hand over the Statement of Allegation to the person against whom complaint is made and give him/ her an opportunity to submit a written explanation if she / he so desires within 7 days of receipt of the same.
- If the Complainant or the person against whom complaint is made desires any witness/es to be called, they shall communicate in writing to the Committee the names of witness/es that they propose to call.
- If the Complainant desires to tender any documents by way of evidence before the Complaints Committee, she / he shall supply true copies of such documents to the Complaints Committee. Similarly, if the Accused desires to tender any documents in evidence before the Complaints Committee he / she shall supply true copies of such documents to the Complaints Committee and will affix his / her signature on the same to certify it to be a true copy.
- The Committee shall call upon all witnesses mentioned by both the parties.
- The Committee shall provide every reasonable opportunity to the Complainant and to the Accused, for putting forward and defending their respective case.



- The Complaints Committee shall complete the “Enquiry” as soon as is reasonably possible and communicate its findings and its recommendations for disciplinary action.
- The Management of the Company will take action in accordance with the recommendations proposed by the Complaints Committee. The Complaints Committee shall be governed by such rules as may be framed by Company from time to time.

**Annexure 1****COMPLAINT REDRESSAL COMMITTEE****As on 1st January, 2014**

S.No.	Name	Designation	Signature
1	Rachita Agnihotri	Chairperson	Sd/-
2	Megha Thakur	Member	Sd/-
3	Khursheed Banu	Member	Sd/-
4	Mahesh Kumar Bukka	Member	Sd/-
5	Umesh Wadhvani	Member	Sd/-
6	Sonica Aron	Third Party	Sd/-