



VANTAGE CORPORATE  
SERVICES LIMITED

---

## **POLICY ON PREVENTION OF SEXUAL HARASSMENT OF EMPLOYEES IN WORKPLACES**

### **I. OBJECTIVE**

Vantage Corporate Services Limited is committed to creating and maintaining a secure work environment where its Employees can work and pursue business together in an atmosphere free of harassment, exploitation and intimidation caused by acts of Sexual Harassment within but not limited to the office premises and other locations directly related to the Company's business

The objective of this policy is to provide protection against sexual harassment of women at workplace and for the prevention and redressal of complaints of sexual harassment and for matters connected there with all concerned should take cognizance of the fact that Vantage Corporate Services Limited strongly is opposes sexual harassment, and that such behaviour against women is prohibited by the law asset down in The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and Rules framed thereunder being the Sexual Harassment of Women at Workplace (hereinafter referred to as "Act") as well as the terms of employment. Commission of any act of sexual harassment as defined in the Act and in this Policy shall result in strict disciplinary action.

At Vantage Corporate Services Limited, we have zero-tolerance for sexual harassment. We value each and every employee working with us and wish to protect their dignity and self-respect. In doing so, we are determined to promote a working environment in which persons of both genders complement each other as equals in an environment that encourages maximum productivity and to keep the personal dignity.

We at Vantage Corporate Services Limited are committed towards giving every employee a just and fair hearing on issues encountered by them at the workplace with special attention to sexual harassment. Vantage Corporate Services Limited will take very serious disciplinary action against any victimization of the employee who is complaining or the alleged harasser that may result from a complaint.

### **II. SCOPE**

Vantage Corporate Services Limited Policy with regard to Prevention, Prohibition and Redressal of Sexual Harassment covers every "employee" across the Company.

Vantage Corporate Services Limited encourages every employee who believes they are sexually harassed to use the redressal mechanism as provided in this policy.

This Policy comes into force with immediate effect.

The scope of these guidelines is to deal with and provide redressal for the following complaints of sexual harassment:

Sexual harassment: The Sexual Harassment means one or more of the following unwelcome acts or behaviour" namely:

- i. Physical contact and advances;
- ii. A demand or request for sexual favour;
- iii. Sexually coloured remark;
- iv. Showing pornography;
- v. Any other unwelcome physical, verbal or non-verbal conduct of sexual nature.

**Explanation (1):**

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

- a. Implied/explicit promise of preferential treatment in her employment.
- b. Implied or explicit threat of detrimental treatment in her employment.
- c. Interference with her work or intimidating or offensive or hostile work environment.
- d. Humiliating treatment likely to affect her health/safety.

**Explanation (2):**

The sexual harassment would include any unwelcome conduct of sexual nature whether verbal, textual, physical, graphic or electronic or by other means, would include but not limited to:

- a. Unwelcome sexual advances or propositions, whether it involves physical touching or not;
- b. Sexual epithets, written (e.g. via SMS, calls, emails etc.) or oral references to sexual conduct, abusive comments about personal sexual activity, life, deficiencies or prowess;

It is clarified that it is the reasonable perception of the woman that would be relevant in determining whether any conduct was sexually determined and, if so, whether such conduct was unwelcome or not would be determined subject to the proper enquiry by the respective committee for the redressal.

**III. INTERNAL COMPLAINTS COMMITTEE**

In compliance with the provision of section 4, chapter II of the said law, every employer of the workplace, by order in writing constitute a committee to be known as Internal Complaint Committee. Pursuant to the said law, the management will constitute the said committee as follows:

- i. At least 50% members shall be women employee.
- ii. The presiding officer shall be senior level women employee.
- iii. Not less than two (2) members from amongst associate preferably committed to the cause of women or have legal knowledge.
- iv. One (1) independent member from non - governmental organisation or association committed to the cause of women or a familiar with the issues relating to sexual harassment.

It is mandatory that the presiding officer of the committee has to be senior female associate from the company provided that rest of members can be either male or female provided that at least 50% of total members shall always be female. Members would be nominated subject to the board of director's approval from time to time.

**IV. COMPLIANT REDRESSAL MECHANISM**

Any aggrieved person may make, in writing, a complaint of sexual harassment at workplace to the committee giving details of the sexual harassment meted out to her/him within a

period of 3 months from the date of incident and in case of a series of incidents, within a period of 3 months from the date of last incident, which may be extended for a further period of 3 months, if circumstances warrant such extension in the opinion of the internal Complaints Committee.

- i. The Presiding Officer or any Member of the Internal Complaints Committee can render reasonable assistance to the person for making complaint in writing, in case they are unable to do so.
- ii. For hearing the complaint and shall intimate the date, time and place of hearing to the Complainant and Respondent. The Internal Complaints Committee shall follow principle of Natural Justice while handling such complaints.
- iii. Where the aggrieved person is unable to make a complaint on account of their physical incapacity, a complaint may be filed by a
  - a. relative or friend; or
  - b. a co-worker; or
  - c. an officer of the National Commission for Women or State Women's Commission; or
  - d. any person who has knowledge of the incident, with the written consent of the aggrieved person.
- iv. Internal Complaints Committee on receipt of such written complaint, may, if require ask the aggrieved person to furnish additional information about the alleged harassment.
- v. The Complainant or person authorized on their behalf as per above provision, shall make a complaint to the Internal Complaints Committee through following mode:
  - a. Copy of complaint along with supporting documents and names and address of witness shall be sent to Internal Complaints Committee
  - b. On receipt of such complaint, Internal Complaints Committee shall provide a copy along with supporting documents of such complaints to the Respondent within 7 working days
  - c. Respondent shall file reply within 10 working days of receipt of the complaint along with list of documents, names and addresses of witnesses
  - d. Internal Complaint Committee shall investigate in detail into the matter of the complaint. The Internal Complaint committee shall have the right to call the person against whom the complaint is made or any other witnesses as when necessary.
  - e. Internal Complaint Committee shall have the right to terminate the enquiry or give ex-parte decision on the complaint, if the Respondent or complainant remains absent for 3 consecutive hearings, without sufficient cause.
  - f. The Internal Committee must complete its investigation within a period 90 days.
  - g. The parties shall not be allowed to bring any legal practitioner to represent them in their case at any stage of the proceedings before the internal Complaints Committee.
  - h. For conducting the enquiry the quorum of the Internal Complaints Committee shall be of 3 members including the presiding officer.

Where a settlement has been arrived, the settlement terms shall be signed by both the parties and shall be provided with a copy of it. Where, a settlement is arrived as mentioned hereinabove, no further enquiry shall be conducted by the Internal Complaints Committee.

## **V. DISCIPLINARY ACTIONS**

On completion of enquiry, the committee will provide a report of its findings within 10 days from the date of completion and such report will be made available to the concerned parties.

If the said committee arrives at the conclusion that the allegation has been proven then shall recommend to the management to take action and impose appropriate penalties for indulging in the acts of misconduct. Following disciplinary action could be imposed as per the existing regulation of Vantage Corporate Services Limited

- i. Verbal warning
- ii. Written warning
- iii. Holding salary increment
- iv. Suspension without salary
- v. Demotion
- vi. Dismissal from services of the company.

These actions are without prejudice to any other remedy or compensation/penalty which could be available to the company or aggrieved party as the case may be under the said law or any other law for the time being in the force.

Such action will be taken within 60 days of the receipt of report

#### **VI. GUIDELINES FOR GRIEVANCE HANDLING**

- i. No person who is a complainant, witness, or defendant in the complaint of gross-misconduct or sexual harassment shall be a member of a Committee.
- ii. Any anonymous complaints, on grounds of difficulty of establishment of facts, are not covered.
- iii. The committee shall enquire into the complaint of sexual harassment by following procedures in conformity with the principles of natural justice and gender sensitivity.
- iv. The Committee will maintain a register to endorse the complaint received by it and keep the contents confidential, if it is so desired, except to use the same for discreet investigation.
- v. If the female complainant conveys its discomforts in presence of any male member, presence of any female members of the said committee shall be ensured for understanding of facts.

#### **VII. ACTION FOR FALSE COMPLAINT**

The complaint of sexual harassment made by any employee shall be taken up with utmost seriousness by Company. However, there shall be zero tolerance for any false accusation.

If the Internal Complaint Committee comes to a conclusion that the allegation was made with malicious intent or the aggrieved person or any other person making the complaint on behalf of the aggrieved person produced false or forged or misleading documents to prove his/her case, the Internal Complaint Committee may recommend action to be taken against the person who has made the complaint, including termination of service. In such a case, malicious intent has to be established after an inquiry, before any action is recommended. A mere inability to substantiate a complaint or provide adequate proof would not attract action as provided herein. A similar recommendation for taking action would be recommended against any witness whom the Internal Complaint Committee concludes, that he/she has given false evidence or produced forged or misleading documents.

It is to be noted that this statement is not intended to discourage employees from coming forward with any complaints. Vantage Corporate Services Limited recognizes and expects that some claims may be difficult to prove or support, or may not in fact be found to raise to the level of seriousness deemed necessary to constitute Sexual Harassment. These types of complaints will not be considered to be false accusations.

### **VIII. INTERPRETATION**

On any occasion of any doubt, differences or dispute in respect of proper interpretation of any terms, condition or clause hereof, the resolution of dispute or the interpretation of such clause given by the Management shall always be final and binding between the parties. Vantage Corporate Services Limited reserves the right to review and revise this policy at any point of time. This policy shall supersede any other previous policy(s)/communications on the subject.

Nothing contained in this policy shall prejudice any right available to the aggrieved employee from seeking any legal remedy under the National Commission of Women Act, 1990, Protection of Human Rights Commission Act, 1993 or under Indian Penal Code and/or any other rule for the time being in the force.

### **IX. DISCLAIMER**

This document is the sole property of Vantage Corporate Services Limited and may not be copied, used or disclosed for any purposes except as authorized in writing by Vantage Corporate Services Limited. The provision of the said shall prevail in case of any inconsistency arise with Policy terms.