

Anti-Sexual Harassment Policy

The Policy for harassment free workplace

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1. Introduction

As an organization, Uniinfo is committed to ensure that the work environment at its office/workplace is compatible and safe. There is harmonious relation-ship among employees. We also strive to guarantee a safe and welcoming environment to all those who visit any of our locations in any capacity, such as customers, vendors etc.

Discrimination and harassment of any type/form is strictly prohibited. We wish to promote and maintain this culture to ensure that associates of the Company do not engage in practices that are abusive in any form or manner whatsoever.

We give high importance in creating a discrimination/harassment free workplace and violation of any form is not tolerated as part of our employee practices. The company is committed not to be any partiality basis on employees 'gender.

Making a false complaint of sexual harassment or providing false information regarding a complaint will also be treated as a violation of policy.

Violation of this policy will call for strict disciplinary action up to and including termination.

2. Objectives

To provide protection against sexual harassment of women at workplace and prevention and redressal of complaints of sexual harassment. Sexual harassment is defined as a violation of the fundamental rights of a woman to equality and right to life and live with dignity under the Constitution of Indian.

Sexual harassment is also considered a violation of a right to practice any profession or to carry on any occupation, trade or business which includes a right to a safe environment free from sexual harassment.

3. Applicability

This policy will extend to all employees of the Company including those employed on contractual basis. The policy also extends to those who are not employees of the Company, such as customers, visitors etc., but are subjected to sexual harassment at the Premises (defined hereinafter) of the Company.

4. Scope of the Policy

This policy applies to all employees who are employed permanently or temporarily at any department or location (visiting at customer site and guest house of the company) by the Company. Any mode of transport provided by the Company.

This policy document will be made available to all locations associated with the Company with a clear objective to establish a similar approach in dealing with this issue.

5. Definitions of Harassment

Sexual harassment includes any one or more of the following unwelcome acts or behavior (whether directly or by implications) and creating a hostile work environment.

- Physical contact or advances
- A demand or request for sexual favors
- Making sexually cultured remarks
- Showing pornography
- Transmitting any message, by mail, telephone, e-mail etc. which is obscene, lewd, suggestive or blatantly sexual in nature
- Sexually charged jokes or remarks and behavior which have sexually oriented innuendoes
- Consistent pattern of unnecessary physical contact, staring or targeting unreasonable attention at an individual in day to day dealings
- Any pervasive pattern of behavior which makes employees uncomfortable, insecure or feel humiliated or disadvantaged on the basis of gender differentiation
- Physical & sexual assault
- Any incident of sexual harassment that happened in the transport provided by the office.

Any other unwelcome physical, verbal or non-verbal conduct of sexual nature.

If the following circumstances exist in relation to any behavior, that is, if any act is done under the following circumstances that would also count as sexual harassment:

- Implied or explicit promise of preferential treatment in employment
- Implied or threat of detrimental treatment in employment
- Interferes with work or creates an intimidating/hostile/offensive work environment
- Implied or explicit threat about her present or future employment status
- Humiliating treatment likely to affect her health and safety.

5.1 Hostile work environment includes:

- Hostile environment sexual harassment occurs when either speech or conduct of a sexual nature takes place, and is seen or perceived as offensive and interferes with the work performance of the recipient, or any one or more employees
- Hostile environment sexual harassment may also include intimidating or harassing conduct that is directed at an individual, or a group of individuals
- It will also mean related retaliation which includes marginalizing someone in the workplace with regard to his / her roles and responsibilities, socially ostracizing, intimidating someone physically, psychologically, and emotionally or someone close to or related to the victim.

This is only an indicative list of the possible acts which could be treated as sexual harassment and is in no way intended to be construed as an exhaustive list.

Where local laws / regulations have clearly defined 'sexual harassment' and procedure to address any complaint relating to it, the interpretation of 'sexual harassment' & the investigation procedure shall be guided in accordance with the local laws / regulations as applicable.

6. Prevention Action

As per the Company policy, sexual harassment is totally prohibited in any way. This applies to all employees of Uniinfo. To prevent sexual harassment, company will take serious action against complaint of this nature. On receipt of any complaint, immediate investigation and further action will be taken by the company against offender.

Such action will depend on the nature and seriousness of the offence and will include strict disciplinary action including and up to termination of services

7. Redressal Committee

Company has established a committee; especially address any complaints of the sexual harassment. The Committee will be nominated by the appropriate functional Head/ HR and would be headed by a woman employee. Committee would also include a member from NGO.

NGO representative and committee member will review all cases of sexual harassment.

In addition to handling complaints of sexual harassment, the committees will also try to do preventive activities to create a sexual harassment free workplace.

The committee members, human resources and reporting managers will be provided necessary training to dealt with appropriately, sensitively and expeditiously.

7.1. Internal complaints committee (ICC)

The Company has established an Internal Complaints Committee for Sexual Harassment consisting of three internal members and one external member. The names of the members of this Committee and their contact details are given below.

S.no	Name	Designation	E-mail	Contact No.
1.	Swati Deo	Presiding Officer	swati.deo@uni-info.co.in	8878132201
2.	Sudha Rathi	Member	sudharathi17@gmail.com	9425319900
3.	Rajesh Sahani	Member	rajesh.sahani@uni-info.co.in	9669944434
4.	Anil Mundra	Member	anilmundra@uni-info.co.in	9425069401

External Representative – Mr. Prashant Srivastava

E-mail: ps.chaitanyaconsultancies@gmail.com

Mob: +91 9754039440

Mr. Kishore Bhuradia, Managing Director, Uniinfo, will provide all necessary support to the work of this Committee.

8. Process For Dealing With Incidents of Sexual Harassment

- If any employee believes or experiences sexual harassment, he /she can contact with any member of ICC. Contact details are provided in this policy document. Affected employee may approach immediate reporting manager/HR team member and such person will inform a member of the Internal Complaints Committee (ICC) immediately.
- However, attempt will be made to get complaint in written stating circumstances, date of alleged occurrences and name of the witnesses, if any. Complaints should be signed by the complainant.
- If aggrieved employee/women is unable to make complain due to his/her physical or mental incapacity, his/her legal heir may make a complaint within 3 months of the incident.
- On receipt of such complaint, the committee head will arrange for a meeting within one week of receipt of the complaint to fully investigate all relevant details of the matter and insure confidentiality of the legal proceedings. The employee/s, who has/have allegedly committed the offence, would be given all reasonable opportunities to be heard by the Committee. Principal of natural justice will be followed irrespective of gender bias.
- During the enquiry, committee will ask the complainant to prepare a detailed statement of incidents/allegations. On other hand, accused will be asked to prepare a response to the statement of allegations and submit to the Committee. The Committee will organize verbal hearing with the complainant and the accused.
- Based on the investigation, report will be recorded and communicated to the management along with a recommendation action from ICC.
- Necessary action will then be initiated by management based on the recommendation of the investigating committee/ICC based on the circumstances and seriousness of the offence.
- The Company will ensure that the career interests of the complainant and aggrieved employee until final solution.
- Excluding exceptional circumstances, committee will complete the process within 30 days post receiving the complaint.
- During the inquiry process, the complainant and accused would be expected to refrain from any form of threat or influence of witnesses.
- To ensure that any important matter is not taken in normal way, company will take serious attention on this.
- If any false and malicious complaint is lodged, in such cases, company will take serious action against the complainant.
- The complaints brought after the time line will not be entertained.
- In case of extraordinary circumstances, respective HOD/Manager will also be expected to be sensitive to any circumstances or behavior among their colleagues which appear to go against the Company policy on this matter. In case they become aware of any such incidence, they will immediately inform the head of the Committee and take appropriate action as advised.
- In any cases, as a first step the matter will be examined by the respective manager and its conclusion and plan for necessary action will be communicated to committee.
- We believe in **No Retaliation** against those employees who have raised concerns of this nature in **Good Faith** and the issues raised will be investigated with full conviction.
- The committee will give the final decision after carefully, honestly, seriously and fairly investigation and reviewing the circumstances, evidence and relevant statements of the

case.

- Confidentiality of such matters will be insured by all the committee members including presiding officer.

9. Safety Guidelines For Women Employees

Uniinfo, as a company is committed to provide safety of our women employees that is very important. In this regards, all arrangements are made to create a safe, un-biased and women-friendly environment.

Some of the rules that are followed in our office currently, with respect to the safely of all our employees and women are as follows:

- No women employee is allowed to work after 7 pm in our office exception would be an extension by 1 hour.
- If there is any extension to working hours, shall be intimated timely
- If any women employee needs to visit client workplace then admin/HR department will book a cab for drop and pick up.
- Details of cab, driver to be registered in the register along with driver's ID and a signature.
- In case of women and men employees are getting dropped in same cab, women employee to be dropped first and men employees last, to see women employees reach home safe.
- Women employees shall inform HR post reaching home.
- Women employees are advised to save the mobile numbers of HR, local police station, women protection cell of police in fast dial mode in mobile phones so that they can quickly access them in case of emergency (numbers are given below).
- In view of any urgency related to work, women employees are requested to come office before regular time, cab driver's name and number to be given to them in advance.

Place	Telephone Numbers
State Women Help Line Number	1090
Women Help Line Number Indore	1091
Indore Police WhatsApp Number	7049124445/ 7587632006
S.P. Office / We Care For You	2522111
Mahila Thana	2499816

10. Employer's Responsibilities

- Dissemination of the policy against sexual harassment
- Carrying out orientation programs for the members of ICC
- Training on self-defense and to face emergencies to women
- Conducting capacity and skill-building programs for the members of ICC
- Use modules developed by State Governments for conducting awareness programmes for employees regarding the provision of the law
- Adequately display notices as required under the law at the workplace to create awareness and continuous sensitization for the employees and list of penal consequences
- Providing access to company policies and manuals, any basic legal literature which is possessed by the employer
- Where the person involved in the harassment is not under control of the employer. In such cases, if the woman requests, the employer is obligated under the law to provide adequate assistance to her in approaching the police and filing an FIR.
