

ASHAPURA INTIMATES FASHION LIMITED

Anti-Sexual Harassment Policy

OBJECTIVE:

ASHAPURA INTIMATES FASHION LIMITED (henceforth referred to as AIFL) is committed to lawful and ethical conduct of business. Honesty, compassion, veracity, reverence for its employees are entrenched as core principles and values of AIFL.

AIFL is an equal employment opportunity provider. The Company does not discriminate its employees on the grounds of gender, promotes a work environment that encourages mutual respect, courteous and congenial relationships. AIFL believes in providing a non-hostile safe working environment without fear of prejudice, gender bias and sexual harassment to all its employees.

All employees of the Company have the right to be treated with dignity and every employee has the right to be protected against harassment. AIFL holds the responsibility to identify and prevent sexual harassment and to develop a culture of dignity and respect in the day-to-day conduct of its business. AIFL will respond promptly to reports of sexual harassment and will take appropriate steps to discipline behavior that violates this and, if necessary, facilitate legal action.

This policy is meant to educate the employees about what conduct constitutes sexual harassment, the ways and means AIFL adopt to prevent occurrence of any such event, and in the event of such an occurrence, to enable a fair mechanism for dealing with such conduct.

OPERATIVE AUTHORITY:

Head of Department

Management

Anti Sexual Harassment Committee

OPERATING PROCESS:

What is Sexual Harassment?

Sexual harassment would mean and include the following, jointly or severally:-

a) Any unwelcome behavior with sexual undertones which has been directed against a person either directly or indirectly. The unwelcome behavior could be in the form of

- Physical contact and advances/ offensive language
- Demand or request for sexual favors
- Sexually colored remarks or/and bawdy humor
- Showing any pornographic material
- Any other unwelcome physical, verbal or non-verbal conduct of a sexual nature.

b) Any unwelcome sexual advances, requests or demand for sexual favors, either explicitly or implicitly, in return for employment, promotion, examination or evaluation of a person towards any company activity;

c) Any unwelcome sexual advances involving verbal, non-verbal, or physical conduct such as sexually colored remarks, jokes, letters, phone calls, e-mail, sms, gestures, showing pornography, lurid stares, physical contact or molestation, stalking, sounds, display of pictures, signs, verbal or non-verbal communication which offends the individual's sensibilities and affects her/his performance.

d) Entry into specific areas earmarked for female employees and students, with the intent to commit mischief and harassment.

e) Eve teasing, innuendos and taunts, physical confinement against one's will and intrusion into one's privacy

f) Act or conduct by a person in authority which creates a hostile environment at the workplace or intimidates the person belonging to the other sex.

Sexual harassment cases can be classified into two categories: -

1. Quid pro quo (meaning this for that)
2. Creation of a hostile working environment

Under the quid pro quo form of harassment, a person or authority, usually the superior of the victim, demands sexual favors for getting or keeping a job benefit and threatens to fire the employee if the conditions are not met.

A hostile work environment arises when a co-worker or supervisor creates a work environment through verbal or physical conduct that interferes with a co-worker's job performance or creates a workplace atmosphere which is intimidating, hostile, offensive or humiliating and an attack on personal dignity. Sexual harassment and abuse damage both, individual and Organizational Health.

What is not Sexual Harassment?

Sexual harassment does not refer to normal conversation that all parties affected find acceptable. It does not refer to office relationships that are freely entered into without intimidation or coercion.

Who is covered under the Anti- Sexual Harassment Policy?

Anti-Sexual harassment at workplace is applicable to:-

- Every employee across the Company – permanent, temporary, on training and on contract;
- An alleged act of sexual harassment that has occurred during or beyond office hours;
- An alleged act of sexual harassment, which has taken place within or outside the company premises
- All the employees, workers and trainees (whether in the office premises or outside while on assignment).

Where sexual harassment occurs to an AIFL employee as a result of an act by a third party or outsider while on official duty, AIFL will take all necessary and reasonable steps to assist the affected person in terms of support, redress and preventive action.

This policy is only applicable when either or both the alleged harasser and the victim are employees/agents of the company. It is not applicable when both the alleged harasser and the victim are third parties.

The definition of sexual harassment shall include any harassment caused to female or male employees. It would also include harassment caused to or by either gender.

Basic definitions for reference:-

1. **Complaint:** Information either oral or written made by the victim against sexual harassment attempted or perpetuated.
2. **Complainant:** The person reporting an incident of Sexual Harassment.
3. **Victim:** The person subjected to Sexual Harassment.
4. **Alleged Harasser:** The person who is alleged or reported to have committed an act of Sexual Harassment.
5. **Employee:** "Employee" means any person on the rolls of the Company including those on deputation, contract, temporary, part time or working as consultants.
6. **Day:** Means normal working days of 9 hours, excluding weekly off and national holidays.
7. **Victimization:** "Victimization" shall be understood to mean any adverse action by an individual, group of individuals or organization against individuals because they have, in good faith,

reported instances of sexual harassment, participated in or been witnesses to proceedings to redress an alleged instance of sexual harassment.

8. **NGO:** "NGO" includes any Non-Governmental Organization registered under the Societies' Registration Act or as a public charitable trust recognized under law. Such a society/charitable trust must not be affiliated to any political party, and should have been engaged in work for gender equality, particularly for the amelioration of the status of women, for a minimum of three years prior to the date of emplacement.

If you are being harassed:-

Know your rights: - Sexual harassment is illegal; both the law of the land and the AIFL Code of Conduct for its employees prohibits Sexual Harassment.

Talk to the Harasser: - Tell the accused that his / her behavior is unwelcome and ask him/her to stop. State clearly and firmly that you want a particular behavior to cease. If employees communicate by letter or memo, they must keep a copy. Name the behavior. Whatever he's just done, say it, and be specific. Hold the harasser accountable for his actions. Don't make excuses for him; don't pretend it didn't really happen. Take charge of the encounter and let people know what he did. Privacy protects harassers, but visibility undermines them.

If, after asking the accused to stop his / her behavior, the harassment continues, report the abuse to Committee formed for this purpose.

Set your own boundaries: - Say "NO" emphatically and clearly when you are asked to go places, do things, and respond to questions, or engage in situations that make you uncomfortable. Do not worry about offending the other person or hurting his or her ego. Take care of yourself first.

Trust your own instincts about possible danger: - In an uncomfortable situation, be direct and honest, and remove yourself from the situation immediately. Make honest, direct statements. Speak the truth (no threats, no insults, no obscenities, no appeasing verbal fluff and padding). Be serious, straightforward, and blunt.

Speaking out: - Speaking about sexual harassment is an effective tool in combating it. While speaking about it, the problem becomes visible, it is acknowledged that it exists, and this in turn leads one to take effective measures against it. Speaking about sexual harassment also gives an opportunity to clarify about it. It helps in changing attitudes of people towards this issue. It mobilizes public opinion against it. It makes it difficult for a potential harasser to commit the crime.

Talk to immediate Supervisor, Manager or HOD:- All Heads of the departments, managers and supervisors have an obligation to provide a work environment free from sexual harassment and to take corrective action. Employees may discuss the situation with their immediate supervisor or with another person in a position of authority.

The employee also can register preliminary complains with Committee or facilitator either as way of putting a deterrent to the act of harass or for formal mediation or warning to the harasser under this policy. The Facilitator, based on seriousness of the complaint, and decision of the victim might or might not present the complaint before the committee. If the Facilitator decides not present the compliant before the committee then the cause and reason for the same shall be recorded in writing and should be approved by the victim. The victim's decision shall be final with regards to registration of complaint with the committee.

Any form of mediation, so undertaken by the facilitator, shall be with the consent and with prior written approval of the victim only. If no settlement or conclusion is arrived at by either party, then the same shall be immediately reported to Anti-sexual harassment committee in writing within 3 working days of such mediation process and/or if the procedure fails.

Any settlement brought about by such Dispute Resolution must be mutually acceptable to both, the victim and accused.

Where any settlement between the victim and accused is reached, the facilitator will record the Dispute Resolution process and the settlement reached; and will send it to the Anti- Sexual Harassment Committee. A copy of the same will be furnished to the victim and accused. Any Dispute Resolution carried out by the facilitator shall be completed within a period of two weeks from the date of the receipt of the complaint.

If methods followed by facilitators fail to generate a positive result, or fail to conclude the issue, or if the victim is not satisfied with the response or outcome, then the employee/victim may send a written complaint either to the Committee directly. The employee may also send an email to the Anti-Sexual Harassment committee on aifl@valentineloungewear.com The complaint should include contact details of the complainant / victim such as name, address, contact number, department, name of reporting boss, name of departmental head, written complaint/email must provide the details of the incident together with the name/s of, the alleged harasser/s and the victim/s, as available.

All complains of sexual harassment shall be lodged at the earliest point of time and within 15 days from the occurrence of the alleged incident.

Employees who feel they have been harassed must maintain records of incidents, including dates, times, places, witnesses, responses of the alleged harassed and harasser, and any other relevant information.

Get a medical check-up: - If you have been raped or physically assaulted while on duty, report immediately to the Committee. Go for a medical check-up. Obtain a medical report, this is important, should you decide to pursue a legal case.

What should be avoided:-

- Do not blame yourself. It is a violation of an individual's right to work and live with dignity.

- Do not ignore the incident. The harasser may misinterpret a lack of response as approval of the behavior.
- Do not delay. Delay in action increases the probability that unwanted behavior will continue or escalate.
- Do not hesitate to ask for help. Speaking up may prevent others from being harmed as well.

Anti-Sexual Harassment Committee:-

In accordance with the **Supreme Court Guidelines in Vishakha v. State of Rajasthan W.P.**, and in adherence to the Sexual Harassment of women at Workplace (Prevention, Prohibition & Redressal) Act, 2013 along with the core commitment to the Constitution, of protecting and nurturing the dignity of the individuals, the Company has formed an Anti Sexual Harassment Committee.

Constitution of Anti Sexual Harassment Committee:-

The Committee shall consist of four (4) members

At least two members of such a Committee shall be women.

One member of the committee shall be from a non-governmental organization ["NGO"] that operates on a secular non-profit basis and is involved in work concerning gender justice.

The "Chairperson" of the Committee is headed by women member as a mandatory process.

It is mandatory that one member of the committee shall be an employee of the company, holding the position of Director, President or VP, AVP, CEO, CFO.

The committee shall have a permanent email id, for employees to register their grievances, complaints or concerns online via email. The employee may email the complaint to the Anti Sexual Harassment Committee on aifl@valentinelounge.com

The quorum for the purpose of meeting/hearing shall be 2/3rd of the members of the Complaints Committee. However, this shall not be a per-requisite for the quorum of an adjourned meeting.

Changes in the constitution of the Complaints Committee, whenever necessary, shall be made as expeditiously as possible and in any case within 15 days of the date of vacancy of office by one of the members.

The Complaints Committee shall meet once a quarter, even if there is no live case, and review preparedness to fulfill all requirements of the Vishakha judgment in the Company.

The minutes of every meeting shall be recorded in the Minutes Register maintained for the purpose.

Disqualification of Chairperson and Members/Facilitators:

A person shall be disqualified for being appointed, elected, nominated or designated as, or for being continued as, a member of Anti Sexual Harassment Committee or as Facilitator if there is any complaints concerning sexual harassment pending against her/him, or if she/he has been found guilty of sexual harassment/serious misconduct.

The tenure of the members of the committee shall be ordinarily for two years from the date of nomination.

Disqualification of an NGO:

A person shall be disqualified from being appointed, elected, nominated or designated as, or from being continued as an NGO representative on the Anti Sexual Harassment Committee if such appointment, nomination, designation election or continuation is inconsistent with the provisions of this code and policy and as per the definition of NGO under this Code and policy.

The tenure of the members of the committee shall be ordinarily for two years from the date of nomination.

Where the accused is a person who is senior to the Chairman under hierarchy of the establishment, then for that particular case, the chairperson shall be substituted on the Committee by another person senior in rank and status to the accused. Such an ad-hoc appointment shall be made by the AIFL Country Manager or a person above his rank only.

Facilitators:-

Any employee who is a Senior Manager or corporate level, can be a facilitator to the Anti-Sexual Harassment Committee. The Anti-Sexual Harassment Committee shall appoint at least a minimum of four employees as facilitators to the Committee.

Role of Facilitators:-

- Shall ensure implementation of this code and policy across various work locations of AIFL.
- Shall regularly review the effectiveness of this code and policy across various locations of AIFL.
- Shall conduct periodic review and survey among select employees of AIFL to find out the extent of the problem and prevailing attitudes to all aspects of sexual harassment.
- Shall educate, train employees of AIFL on this code and policy and about their rights and responsibilities.
- Shall assist victim in the entire procedure of inquiry and act as first point of contact (as and when applicable). Help understand the classification and nature of the concern and support and provide remedies available, and its outcome under this code and policy; Help the victim solve the concern raised by him/her within the means available in this code and policy.
- Shall make reports on acts and measure taken and pursued, in furtherance of essence of this code and policy, to Anti Sexual Harassment committee.

- Shall act as a counselor, mediator and act as receiver of the formal request for inquiry, which may be the first step towards approaching the inquiry mechanism under this code and policy.
- Safeguard employees involved as victim or witness from victimization.
- Maintain total and complete confidentiality at all times with regards to all proceedings, acts taken or prescribed to be taken under this code and policy.

Role of Anti Sexual Harassment Committee:-

- The Committee shall decide whether the facts contained in the complaint make out a case of “sexual harassment” in light of the definition contained in the Policy.
- The Committee shall look into the truth of the allegations contained in the complaint.
- The Committee shall look into the truth of any allegation of retaliation against / victimization of the complainant or any other person assisting her as a result of such complaint having been made or such assistance having been offered.
- The Committee shall recommend the penalties / action to be taken against any person found guilty of having sexually harassed the complainant, up to and including termination, to the HR Department.
- The Committee shall recommend the penalties / action to be taken against any person found guilty of having retaliated against / victimized the complainant or any other person assisting her as a result of such complaint having been made or such assistance having been offered.
- The Committee shall recommend appropriate psychological, emotional and physical support (counseling, security and other assistance) for the victim to the HR Department.
- The Committee shall recommend the penalties / action to be taken against any person found guilty of having made false claims of having been sexually harassed, up to and including termination, to the HR Department.
- The Committee shall monitor the follow-up action to be taken by the HR Department on receipt of the Report of the Committee.
-

Rights and Powers of the Anti-Sexual Harassment Committee:-

- The Committee shall have the power to summon witnesses and call for documents or any information from any employee.
- If the Committee has reason to believe that an employee is capable of furnishing relevant documents or information, it may direct such person to produce such documents or information by serving a notice in writing on that person, summoning the person, or calling for such documents or information at such place and within such time as may be specified in the written notice.
- Where any relevant document or information is recorded or stored by means of a mechanical, electronic or other device, the Committee shall have the power to direct that the same be produced, or that a clear reproduction in writing of the same be produced.
- Upon production of documents / information called for by it, the Committee shall have the power to make copies of such documents / information or extracts there from; or retain such documents / information for such period as may be deemed necessary for purposes of the proceedings before it.

- The Committee shall have the power to issue interim directions to / with regard to any person participating in the proceedings before it.
- The Committee shall have the power to recommend the action to be taken against any person found guilty of sexually harassing the complainant; retaliating against / victimizing the complainant or any other person before it; and making false charges of sexual harassment against the accused person.
- Committee shall have powers to take evidence on oath from parties involved in matters/charges presented before it for adjudication.
- Committee shall have powers to order interim relief including powers to suspend the accused till conclusion of proceedings or till such time it deems fit.
- Committee shall have powers to form an investigation team and also have powers to dissolve the investigation team so created for investigation into an accusation of sexual harassment.
- Issue restraining orders against harasser.

Procedures to be followed by the Anti-Sexual Harassment Committee:-

An inquiry and all proceedings and fact finding and related correspondence are to be initiated only through the members of the Investigation Team.

No person accused of an act of Sexual Harassment under this policy shall be part of the decision-making process referred to and under this code and policy.

An official Complaint Register bearing the date of opening of such register shall be maintained by the Committee. All complaints received shall be numbered and entered in the Complaint Register with date of receipt of the Complaint. Complaints sent by registered post bearing, the correct name and address of the complainant shall be received and entered in the register.

Depending upon the nature of the Compliant, the Anti-sexual harassment committee may direct that an inquiry be conducted by an Investigation Team constituted by the Anti-Sexual Harassment Committee. The Anti-Sexual Harassment Committee may not order an inquiry, if examination of witnesses/documents is not necessary to arrive at a conclusion. In either case, the Anti Sexual Harassment Committee shall provide an opportunity to the victim as well as the alleged harasser to represent their position and provide their explanations.

In the event an inquiry is found to be necessary, then within three days of the complaint being sent by the victim and it being received by the Anti Sexual Harassment Committee, the Committee shall issue a formal notice of inquiry to all parties involved and also furnish a notice requesting all parties concerned to submit their written submission within seven working days of having received the notice.

Within seven (7) working days, all parties involved shall submit their replies to the Anti-Sexual Harassment Committee. Each party shall be provided with a copy of the written statement(s) submitted by the other, and reasonable time shall be provided for either parties/party to study the same prior to appearing before the Anti-Sexual Harassment. Maximum limit for reasonable time would be seven (7) days.

Within 48 hours of receipt of written statements by both parties, Anti-Sexual Harassment Committee shall send a notice to both the parties requesting them to produce relevant documents and witnesses to support their case. Documents produced by either party shall be affixed with that party's signature to certify the document as original / true copy.

Within four working days from the receipt of written statements by both parties and submission of relevant documents and witnesses, the Anti-Sexual Harassment Committee shall send a notice to the concerned parties, calling for an oral hearing.

The Chairperson shall issue 7 days prior notice to all the members and the parties involved intimating the date fixed. On the date fixed for hearing of the Complaint, the Committee shall by notice direct the parties to appear before the Committee to present their case. Each Party shall be given a chance to give an account of the sequence of events leading to the request for inquiry before the Anti-Sexual Harassment Committee.

The Anti-Sexual Harassment Committee shall have the power to ask questions which it deems fit to the parties during the oral hearing, which may also include any questions which have been submitted by the other party by way of written statement or through relevant document.

The Anti-Sexual Harassment Committee shall permit either party to include, introduce, and adduce new documents as evidence during the oral hearing.

After hearing all the parties concerned, and upon perusal of documentary evidence (if any) and all the documents which have been filed by the parties the Committee may terminate the proceedings if it is of the opinion that no prima facie case exists. The Committee may call upon any or all or additional witnesses and ask them any such questions as it may deem fit, which may also include any questions which have been submitted by either party.

After hearing all the parties concerned and upon perusal of documentary evidence (if any), along with majority members of the Committee present expressing their individual opinion in writing, the Committee shall within one week, submit a report to the Chairman with its factual findings and a observations on whether this Code or policy has been violated.

The Chairman may refuse to concur with the report and recommendation to dismiss the complaint and may refer the report back to the Committee for re-consideration on the points noted by him on the report.

The Committee after receipt of its report for reconsideration shall meet and reconsider its report in the light of the note of the Chairman of the Anti-Sexual Harassment Committee and shall take a decision to either change or maintain its report in the original form and send/ forward the same to the Chairman for his final decision. The Chairman shall have no discretion but to accept the report forwarded by the Anti-Sexual Harassment Committee after reconsideration and shall pass the final order following the report and recommendation of the Committee. In case of difference of opinion amongst the members, the opinion of the majority shall prevail.

On the basis of the report of the Anti Sexual Harassment Committee, the disciplinary proceeding for misconduct of sexual harassment shall be drawn up/ initiated against the delinquent employee. The disciplinary proceeding against the delinquent employee shall be concluded within 45 days from the date of report and disciplinary proceeding being so initiated against the delinquent employee.

The entire process of inquiry till submission and acceptance of report shall be concluded within three months or 90 days from the date of the complaint officially being registered with the Anti-Sexual Harassment Committee.

Possible Disciplinary Actions arising out of the Recommendations:

- A letter of warning that will be placed in the personal dossier of the harasser.
- Immediate transfer or suspension without pay or both.
- Fine equivalent to 2-4 months' salary that can be credited to a fund created to be utilized for the welfare of the employees.
- Stoppage of increment with or without cumulative effect.
- Reduction in rank.
- Curtailment of privileges.
- Fine up to twenty thousand rupees (Rs 20000/-), towards employee welfare fund or other social causes via any renowned NGO.
- Termination/dismissal from the services of the Company.
- Any other action that the Disciplinary Authority may deem fit
- Filing a complaint before the relevant police station/Court.
- Mandatory attendance in a sexual harassment workshop or counseling program.

Pointers for Anti Sexual Harassment Committee/Core Committee/Facilitators:

- Written record of all discussions are to be maintained by the committee. Appropriate recordings of each inquiry sitting and observations shall be made by the committee members.
- The Company will provide counselor services to the victim / harassed on request, at no additional cost to the victim/ harassed.
- Inquiry to be conducted in a neutral location which provides an environment conducive for both the victim and alleged harasser.

During the process of investigation, the Company will ensure no further harassment or victimization happens to either the victim or the alleged harasser and duties are carried out as normal. The Company will also ensure that there is no proximity at work place between the victim and the alleged harasser while the complaint is pending. Necessary work arrangements, including transfer, if necessary, will be made by the Company for this purpose. Every Head of Department, manager or supervisor or any other employee must contact the Committee or members immediately upon receiving a complaint and must be alert to any possible retaliatory actions. The victim may directly communicate with the members of the Committee or any other superior officers, in case of any suspected retaliatory action. Disciplinary action will be taken by the Committee against any such complaints which are found genuine.

- Discussions are to be conducted with the complainant, victim and alleged harasser as required.

- The Anti-Sexual Harassment Committee will exercise utmost care in treating the entire process with the dignity, sensitivity and respect it merits including protection of the victim / harassed.
- Both the parties may be allowed to bring in a colleague for specific advice and support. However, the same shall not be allowed if it causes undue delay or disrupts the committee proceedings.
- Maintain records of all the Sexual Harassment cases and findings.
- The Committee shall ensure that a fair and just investigation is undertaken immediately.
- It shall allow both parties reasonable opportunity of presenting their case. However, should the accused choose not to participate in the proceedings, the Committee shall continue ex parte.
- All proceedings, including the statements and other material adduced as evidence before the Committee shall be strictly confidential. The Committee shall take all steps to ensure that the parties before it and their representatives shall maintain strict confidentiality in all respects.
- In case of sexual harassment of any employee by any person not employed by AIFL , the HR Department shall take all steps necessary and reasonable to assist the affected employee in terms of providing her/him with psychological, emotional and physical support and enabling her/him to take recourse to the law. When such conduct complained of, amounts to a specific offence under the Indian Penal Code or under any other law, the Committee through the Chairperson, apart from inquiring into the complaint and submitting its report, shall initiate appropriate action by lodging a complaint with the local police. Irrespective of the filing of criminal proceeding and the result of such proceeding, the Committee may proceed with its own inquiry and give its report for action and decision of the disciplinary authority.
- The Committee shall provide fair, sensitive and quick redressal .
- The Committee may take the help of counselors and legal experts having sufficient knowledge and expertise in cases of Sexual Harassment for guidance and consultation. The Committee in implementing and exercising its power shall be entitled to take the help of medical authorities and legal experts for opinion and guidance.
- No observations regarding the work and behavior of either the complainant or defendant shall be made, which are not related to the alleged act of sexual harassment. The committee shall not permit any evidence or examination based on the aggrieved parties character, personal life, and conduct, personal and sexual history.
- After concluding its inquiry, the Committee shall prepare a detailed and written report of its findings. The inquiry report shall specify the details of the charge(s) against the defendant, the statements made and evidence presented in the inquiry and a discussion of the reasons upon which the findings have been arrived at by the Committee.
- No decision taken under this rule, except the final decision of the Chairman of the Anti Sexual Harassment Committee shall be made public.
- All information received in the course of the examination and inquiry into a complaint of sexual harassment shall be held in trust, by the Anti-Sexual Harassment Committee, and treated as classified and confidential in form and shall not be shared with the general public or employees.
- All persons involved in the proceedings under this Code and policy including the parties, witnesses, facilitators, mediators, members of the inquiry panel, Anti-Sexual Harassment Committee and the Chairman shall be under a duty to respect and maintain confidentiality.
- All proceedings under this rule shall be strictly in camera and the privacy of all parties shall be maintained.
- Any person conducting any proceedings under this code and policy shall rescue herself/himself if s/he feels that her/his objectivity may be compromised due to any reason or conflict of interest.



- No minor infringement of procedure shall invalidate any proceeding under this rule unless it is shown to cause prejudice to any of the parties.

- 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.
- Any act of sexual behavior, if noticed by any third party may be brought to the notice of the committee or the management. Such acts may be considered as harassment, if quid pro quo or hostile work environment conditions prevail. Otherwise, it could be treated as non-professional behavior at the workplace and may be dealt with by the company outside the purview of this policy.
- The Anti-Sexual Harassment Committee shall keep complete and accurate documentation of the complaint, its investigation and the resolution thereof. The incident would be documented in both, the complainant's and the accused's files with the full report of the Anti Sexual Harassment Committee.

Complaints made with a malicious intent:

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.

In the event that the formal request for inquiry is proved to be malafide, Anti-Sexual Harassment Committee shall recommend to the Chairman that the person found guilty of such a malafide and fraudulent act be required to issue a written public apology to the person who has been so falsely accused of sexual harassment, which is to be displayed prominently on all notice boards in the Company.

Insufficient evidence to support a complaint does not necessarily mean that the charge was intentionally false. Material, circumstantial and factual evidence needs to be produced which could prove the complaint made was with malicious intent.

Possible disciplinary actions for filing complaints with malicious intent:

- A letter of warning that will be placed in the personal dossier of the harasser.
- Immediate transfer or suspension without pay or both.
- Fine equivalent to 2-4 months' salary that can be credited to a fund created to be utilized for the welfare of the employees.
- Stoppage of increment with or without cumulative effect.
- Reduction in rank.
- Curtailment of privileges.
- Fine up to twenty thousand rupees (Rs 20,000.00) towards employee welfare fund or any other social causes via any renowned NGO.
- Termination/dismissal from the services of the Company.
- Any other action that the disciplinary authority may deem fit.
- Filing a complaint before the relevant police station/court.

The intent of this policy is to create a harmonious and safe working environment. To ensure that this is upheld in both letter and spirit, we urge AIFL employees to desist from lodging wrongful allegations. This would apply to third parties also.



Sexual Harassment Investigation Guide:-

- Listen to the charge. Don't make comments like, "You're overreacting."

- Do not blame the employee for the conduct that occurred or ask what he or she did to encourage it.
- Acknowledge that bringing a harassment complaint is a difficult thing to do.
- Maintain a professional attitude.
- Gather the facts; don't be judgmental. Do not assume the complaining employee's story lacks merit. Do not assume the alleged harasser is guilty.
- Ask who, what, when, where, why, and how. Find out if the employee is afraid of retaliation.
- How does the employee want the problem resolved?
- Take all complaints seriously and listen actively.
- Investigate immediately. Delaying or extending an investigation can make witness testimony increasingly unreliable.
- The manner in which the investigation is handled can itself furnish grounds for a hostile environment claim, so carefully document every step.
- If there is more than one allegation, treat each separately.
- Find out whether there was a pattern of previous episodes or similar behavior toward another employee.
- Prepare a detailed chronology.
- Don't make any statements about the accused employee's character, job performance, or family life.
- Identify the relationship of the accused to the complainant.
- Obtain statements from any witness who supports or denies any of the complainant's allegations. Be aware that witnesses are often reluctant to come forward out of fear of reprisal.
- The personal life of the complainant is not relevant to any inquiry.
- Oral complaints to be reproduced in writing. It shall be the duty of the Authority/ person before whom an oral complaint is made to reduce the said complaint in writing and read out the complaint to the complainant in the language requested by the complainant and obtain the signature of the complainant.
- Provisions relating to conducting of inquiry shall govern and prevail, in the procedures of existing Acts, Rules and governing procedures in dealing with conducting of an inquiry into cases of sexual harassment.
- No decision shall be taken by the Committee against anyone without giving the opportunity of hearing.
- A complaint relating to sexual harassment shall ordinarily be preferred within one month from the date of the alleged offense and the delay, if any, in preferring such complaint may be condoned, provided that the complainant submits sufficient cause for such delay.
- Any perceived delay in filing a complaint, by itself, shall not be a relevant factor in deciding the veracity of the complaint or in appreciating the evidence presented.



General Pointers for employees of AIFL:

- Employees of AIFL India should abstain from committing any acts which amount to sexual harassment at the workplace and are encouraged to report incidents of sexual harassment without fear or favor.
- Head of departments, Managers, Supervisors are required to create appropriate working conditions in respect of work, leisure, health and ensure there is no hostile environment in the work place.
- Head of departments, Managers, Supervisors are required to report any complaint or grievance immediately to the Anti-Sexual Harassment Committee or to facilitators.
- It is both the duty and obligation of the HR department to provide necessary communication and training across the company, with respect to the anti-sexual harassment policy.
- Human Resource shall ensure this policy is communicated, explained and handed over at the time of induction of every employee.
- Human Resource in consultation with the Anti Sexual Harassment Committee or facilitators, clarifies to employees on any queries related to this policy wherever required.
- Human Resource shall ensure implementation of this policy in line with overall Anti-Sexual Harassment Committee guidelines and directions. Human resources shall provide appropriate training to employees on gender sensitivity and ensure that this policy and code is communicated, explained and handed over at the time of induction of every employee.
- Management and supervisory personnel must be sensitive to acts of conduct which may be considered offensive by fellow personnel and must refrain from engaging in such conduct.
- It is the duty of the Anti-Sexual Harassment Committee Head of departments, Managers, Supervisors and Human Resource Department, to ensure that there is no retaliation or retribution happening against the victim, witnesses or accused at the workplace, where the supposed action is to have taken place.

Revision and term of the Code and Policy: This Code shall be reviewed at least once in 03 years

Committee and Facilitators Contact Details: Names of the members of the Anti-Sexual Harassment Committee along with their contact details are stated in the table below. The HR Manager will periodically update the list of names and contact details of the committee members.