



INTERNAL
**POLICY ON SEXUAL HARASSEMENT OF WOMEN AT
WORKPLACE**
(Prevention, Prohibition & Redressal) ACT, 2013

Version No	1.2	Prepared By	Sr Manager (HR) <i>Lakhe</i>
Date	09 th December'13	Approved By	CMD <i>Ashok</i>
Copy No		Effective from	09 th Dec'13 <i>10/1/14</i>

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1.0 POLICY

1.1 Zen Technologies Limited, (Herein after referred to as the “Company”) provides an equal employment opportunity for its employees and is committed to create a healthy and safe working environment that enables employees to work without fear of prejudice, gender bias and sexual harassment. The Company also believes that all employees of the Company have the right to work with dignity. The company will not tolerate any form of sexual harassment and is committed to take all necessary steps to ensure that its women employees are not subjected to any form of harassment. Sexual harassment at the work place or other than work place that is involving female employees, considered as serious offence and is, therefore, punishable.

1.2 The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 has come into force with effect from 09th December 2013. This policy is framed in accordance with the said act 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 therewith or incidental thereto.

2.0 SCOPE

2.1 This Policy is applicable to all categories of employees of the Company (“Employee” means any person on the rolls of the Company including those on deputation, contract, temporary, trainees, apprentices, part time or working as consultants).

2.2 Sexual harassment would mean and include any of the following:

Unwelcome sexual advances, involving verbal, non-verbal, or physical conduct such as sexually colored remarks, jokes, letters, phone calls, e-mail, gestures, showing of pornography, lurid stares, physical contact or molestation, stalking, sounds, display of pictures, signs, verbal or non-verbal communication which offends the individuals sensibilities and affect her/his performance (employee’s dress style, social habits, or previous intimate relationship with a colleague in the workplace will be taken into consideration while assessing, whether the conduct was unwelcome or welcome).

Requests or demand for sexual favors, either explicitly or implicitly, in return for employment, promotion, eve teasing, innuendos and taunts, physical confinement against one’s will and likely to intrude upon one’s privacy; act or conduct by a person in authority which creates the environment at workplace hostile or intimidating to a person belonging to the other sex; conduct of such an act at work place or outside in relation to an Employee of Zen, or vice versa during the course of employment; and any unwelcome gesture by an employee having sexual overtones.



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Employee responsibilities regarding Sexual Harassment:

All employees of the company have a personal responsibility to ensure that their behavior is not contrary to this policy. All employees are encouraged to reinforce the maintenance of a work environment free from sexual harassment.

3.0 INTERNAL COMPLAINTS COMMITTEE

3.1 Initially and till further notice, a Committee has been constituted by the Management to consider and redress complaints of Sexual Harassment. The Committee is constituted with the following:

Committee:

1. Presiding Officer - Ms Padmavathy – AGM (Finance)
2. Member 1: Ms Amala – Company Secretary
Member 2: Ms Sujana B – Executive Secretary
3. One member (Non- Government organization) – Dr B N Ravi

4.0 INQUIRY AND REDRESSAL PROCEDURE

4.1 Any employee who feels that she is being sexually harassed directly or indirectly may submit a complaint of the alleged incident to any member of the Committee or HR-Head in writing with her signature or by sending an e-mail at : grievance@zentechnologies.com, within 10 days of occurrence of incident and not later than 3 months from the date of incident.

The committee shall initially try to resolve the issue through conciliation between the complainant & respondent.

In case of failure of the conciliation, the committee initiates the impartial investigation proceedings. Both the parties would be given a fair opportunity to represent their versions along with the findings of the committee.

Within 7 days of receipt of the complaint, the Committee shall send one copy of the complaint to the person against whom complaint is made and give him an opportunity to submit a written explanation within 10 days of receipt of the same.

The Complainant shall be provided with a copy of the written explanation submitted by the person against whom complaint is made.



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- 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, whom they propose to call.
- If the Complainant desires to tender any documents by way of evidence before the Committee, she shall supply original copies of such documents. Similarly, if the person against whom complaint is made desires to tender any documents in evidence before the Committee he shall supply original copies of such documents. Both shall affix her/his signature on the respective documents to certify these to be original copies.
- 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 respondent, for putting forward and defending their respective case.
- The Committee shall complete the “inquiry” within reasonable period but not beyond one month and communicate its findings and recommendations to the Management to act upon. The report of the committee shall be treated as an inquiry report on the basis of which the erring employee can be directly awarded appropriate punishment and ordering for payment of compensation.
- The Management will direct appropriate action in accordance with the recommendation proposed by the Committee within a period of 60 days.
- The Committee shall be governed by such rules as may be framed by the Central Government or any other legislation enacted at a later date.
- If the complaint is against the Superiors/Co-employee the Management will ensure that the complainant is not discriminated/harassed in day to day work or during sanction of Leave/increment/promotion etc.,

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.

In the event, the complaint does not fall under the purview of Sexual Harassment or the complaint does not mean an offence of Sexual Harassment, the same would be dropped after recording the reasons thereof.

In case the complaint is found to be false, the Complainant shall, if deemed fit, be liable for appropriate disciplinary action by the Management, as recommended by Committee.



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OTHER POINTS TO BE CONSIDERED

6.1 Company will conduct workshops on regular intervals to bring awareness among employees. During induction program also the new employees will be briefed on this subject.

6.2 The Committee may recommend to the Management, action which may include transfer of the complainant or respondent or any other appropriate disciplinary action.

6.3 The management shall provide all necessary assistance for the purpose of ensuring full, effective implementation of this policy.

6.4 Where sexual harassment occurs as a result of an act or omission by any third party or outsider, Zen shall take all necessary steps to assist the affected person in terms of support and preventive action.

6.5 The Committee shall analyze the complaints and prepare Annual report to submit to employer and the District officer within the time frame defined.

6.6 In case the Committee finds that the offence committed is covered under the Indian Penal Code, then this fact should be mentioned in its report and appropriate action shall be initiated by the Management, for making a Police Complaint.