



## **POLICY – PREVENTION OF SEXUAL HARASSMENT**

### **1. Objective**

At the SAT, we have zero-tolerance for Sexual Harassment (as defined below). We value every single Employee working at the SAT and wish to protect their dignity. In so doing, we are determined to promote a working environment in which person belonging to any gender work and complement each other as equals in an environment that encourages maximum productivity.

Behavior that has been defined as inappropriate by the SAT Policy on Prevention, Prohibition & Redressal of Sexual Harassment at the Workplace ('the Policy') and (whether physical verbal, written, graphic emotional or through gestures that offend) intentionally or not, and offends the dignity and morality of a person to which the behavior is directed by fellow Employees, supervisors, customers and, suppliers will be considered Sexual Harassment and invite serious disciplinary action or other action as necessary, as described in more detail below

- To create a safe, respectful, and harassment-free workplace for all employees.
- To ensure compliance with the POSH Act, 2013.

### **2. Scope**

- The Policy is applicable to all individuals employed or engaged by the Company, including but not limited to permanent employees, temporary employees, contractual workers, interns, consultants, and any other person working at the workplace of the Company./ Company's premises.
- It extends to all workplaces, including the office, remote work locations and off-site activities like meetings, training, and social gatherings related to work.
- Sexual Harassment shall be irrespective of sex, between same sex or opposite sex.

### **3. Definition of Sexual Harassment**

#### **• DEFINITIONS**

**Sexual harassment** may occur not only where a person uses sexual behaviour to control, influence or affect the career, salary or job of another person, but also between co-workers. It may also occur between an employee and someone that employee deals within the course of his/her work who is not employed by the Company.



Sexual Harassment” includes any one or more of the following unwelcome acts or behaviour (whether directly or by implication), but not limited to:

1. Any unwelcome sexually determined behaviour or pattern of conduct, that would cause discomfort and/or humiliate a person at whom the behaviour or conduct was directed namely:
  - Unwelcome sexual advances involving verbal, non-verbal, or physical conduct, implicit or explicit
  - Physical contact and advances including (but not limited to) touching, stalking, sounds which have explicit and /or implicit sexual connotation/overtones, molestation
  - Teasing, Voyeurism, innuendos and taunts with implicit sexual connotation, physical confinement and /or touching against one’s will
  - Demand or request for sexual favours
  - Sexually coloured remarks or remarks of a sexual nature about a person's clothing or body
  - Display of pictures, signs etc. with sexual nature/ connotation/ overtones in the work area and work related areas
  - Showing pornography, making or posting vulgar / indecent / sexual pranks, teasing, jokes, demeaning or offensive pictures, cartoons or other materials through email, SMS, MMS, gestures etc.
  - Repeatedly asking to socialize during off-duty hours or continued expressions of sexual interest against a person’s wishes
  - Giving gifts or leaving objects that are sexually suggestive
  - Eve teasing, innuendos and taunts, physical confinement against one’s will or any such act likely to intrude
  - upon one’s privacy; Persistent watching, following, contacting of a person; and
  - Any other unwelcome physical, verbal or non-verbal conduct of sexual nature
  
2. The following circumstances if it occurs or is present in relation to any sexually determined act or behaviour amount to sexual harassment:
  - Implied or explicit promise of preferential treatment in employment;
  - Implied or explicit threat of detrimental treatment in employment;
  - Implied or explicit threat about the present or future employment status;
  - Interference with the person’s work or creating an intimidating or offensive or hostile work environment; or
  - Humiliating treatment likely to affect health or safety.



An alleged act of sexual harassment committed during or outside of office hours falls under the purview of this policy. Further, it is important to note that whether harassment has occurred or not does not depend on the intention of the people but on the experience of the aggrieved person.

- ❖ **Aggrieved Person:** means a person in relation to workplace whether employed or not, who alleges to have been subject to any act of sexual harassment by the Respondent in relation to a Workplace, is a person, of any age, and gender, whether an Employed or not, who alleges to have been subject to any act of sexual harassment by the Respondent.
- ❖ **Complainant:** Any aggrieved woman who makes a complaint alleging sexual harassment under this policy
- ❖ **Respondent:** A person against whom a complaint of sexual harassment has been made by the aggrieved woman under this policy
- ❖ **Employee:** A person employed at the workplace, for any work on regular, temporary or daily wage basis, either directly or through an agent, including a contractor, with or without the knowledge of the principal employer, whether for remuneration or not, or working on a voluntary basis or otherwise, whether the terms of employment are express or implied and includes a coworker, a contract worker, probationer, trainee, apprentice or called by any other such name.

#### **4. Internal Complaints Committee (ICC)**

- An Internal Complaints Committee (ICC) will be established to handle complaints of sexual harassment.
- Composition of the ICC:
  - Presiding Officer: A senior woman employee.
  - At least two members from the company with knowledge or experience in dealing with such matters.
  - An external member from an NGO or similar organization experienced in issues of sexual harassment.
- The ICC will have a minimum of 50% women members.

#### **5. Complaint Mechanism**

- **Filing a Complaint:**

Any Aggrieved Individual who has experienced or has been subjected to any act of sexual harassment by an Employee shall be entitled to lodge a complaint with the ICC. The complaint



must be submitted in writing within a period of three (3) months from the date of the incident and in case of a series of incidents, within a period of three (3) months from the date of last incident. This may be extended for a further period of three (3) months, if circumstances warrant such extension in the opinion of the ICC.

The ICC can initiate inquiry on the complaint only if the complaint is in writing. In case a complaint may be conveyed verbally to any member of the ICC, the member of the ICC to whom the complaint is made or any other member of the ICC shall render all reasonable assistance to the Aggrieved Person for making the complaint in writing.

Anonymous complaints cannot be accepted by ICC at any point in time.

The complaint must contain a description of the event (s) as well as the names and contact email/phone number of Witnesses if any. Supporting documents, if available, such as letters, transcription of text messages etc., supporting the complaint of sexual harassment at Workplace against the Respondent should accompany the complaint.

In the event that a Complainant is unable to lodge a complaint because of any physical or mental incapacity or death or otherwise, his/her legal heir, co-worker or any person with knowledge of the incident may make a complaint to the ICC.

- **Confidentiality:**

The identity of the complainant, accused, and witnesses will be kept confidential throughout the process.

- 6. **Grievance Redressal Process**

- **Acknowledgment:** The ICC will acknowledge receipt of the complaint within seven (7) days.
- **Investigation:** The ICC will conduct a fair and impartial investigation, providing both parties an opportunity to present their case.
- **Timeline:** The investigation will be completed within ninety (90) days of receiving the complaint.
- **Report:** A detailed report will be submitted to the employer within ten (10) days of the completion of the investigation.
- **Action:** Based on the ICC's findings, appropriate action will be taken, which may include:
  - Warning, transfer, suspension, or termination of the accused.
  - Counseling or training sessions.

- 7. **Consequences of Malicious Complaints**



- If a complaint is found to be malicious, disciplinary action may be taken against the complainant, in accordance with the POSH Act.

#### **8. Retaliation and Victimization**

- Retaliation against the complainant, witnesses, or members of the ICC is strictly prohibited. Any such act will result in disciplinary action.

#### **9. Responsibilities of the Employer**

- Ensure a safe and secure working environment.
- Display POSH-related information prominently in the workplace.
- Provide necessary support to the ICC for conducting inquiries.
- File an annual report with details of sexual harassment cases, if any, as per legal requirements.

#### **10. Review and Updates**

- The POSH policy is subject to review as may be deemed necessary as per any regulatory amendments.

#### **Implementation Guidelines**

- ✓ **Training:** Conduct mandatory training sessions for all employees and ICC members.
- ✓ **Annual Report:** File an annual report to the District Officer, detailing the number of cases filed and resolved.
- ✓ **Awareness:** Share this policy with all employees and make it accessible on the company's intranet or notice board.

#### **Reporting Channels**

Email: [hr@satgroup.in](mailto:hr@satgroup.in)

Call on: 02265209500