

CLIO INFOTECH LIMITED

PROHIBITION OF SEXUAL HARRASSMENT POLICY

1. POLICY STATEMENT AND OBJECTIVE

GBL believes in gender equality and aims to provide a safe working environment for all people especially women. GBL does not tolerate sexual harassment in any form and every employee and all people associated with GBL have a responsibility to ensure that there is no sexual harassment of any form. This policy establishes guidelines for the prevention of sexual harassment at GBL workplace at all levels.

2. SCOPE AND APPLICABILITY

The policy is applicable all the employees as well as the Board of Directors of the company. Company encourages all parties associated with it to comply with the aforesaid policy and avoid complicity with anyone that violates this policy. GBL will afford natural justice to any person involved in any case of sexual harassment.

3. DEFINITION OF SEXUAL HARASSMENT

No woman shall be subjected to sexual harassment at any workplace of GBL Anyone found to have sexually harassed another person will be subject to disciplinary action. The following, among others, if it occurs or present in relation to or connected with any act or behavior of sexual harassment may amount to sexual harassment:-

- I. implied or explicit promise of preferential treatment in her employment; or
- II. implied or explicit threat of detrimental treatment in her employment or her present or future employment status; or
- III. interference with her work or creating an intimidating or hostile work environment for her or humiliating treatment likely to affect her health or safety.
- IV. Physical contact and advances
- V. Demand or request for sexual favours or making sexually coloured remarks
- VI. Showing pornography
- VII. Any other unwelcome physical, verbal or non verbal conduct of sexual nature

4. INTERNAL COMMITTEE

The Management shall form an "INTERNAL COMMITTEE" which shall be responsible to take up all matters of sexual harassment. It shall have following members:

1. A Presiding Officer who shall be a senior level woman employed at SCL workplace;
2. not less than two Members from amongst employees preferably committed to the cause of women or having experience in social work or have legal knowledge;
3. One member from amongst non-govt. organizations or associations committed to cause of women or a person familiar with issues relating to sexual harassment;
4. Provided that at least one-half of the total Members so nominated shall be women

The above members are appointed for a period of 3 years from the date of constitution of this committee under this policy. The above details about the committee shall be displayed on the internal website of the company.

This committee shall be responsible to look into cases occurring at all places of GBL. Among other things, the committee shall endeavor to organize workshops/ awareness program at regular intervals for employees and arrange to display at any conspicuous place the penal consequences of sexual harassments.

5. PROCEDURE FOR MAKING A COMPLAINT

Any women who believe to have been sexually harassed may mark her complaint in writing through letter, email, fax or any other legal mode to the Presiding Officer or any other member of the Internal Committee of SCL within three months of the incident and in case of series of incidents then within three months from the last date of incident. The internal committee may extend the period of three months to further three months if it is satisfied with the reasons for delay and record the reasons in writing.

Reports of sexual harassment will be treated promptly, seriously and confidentially. The complainant as well as the alleged harasser shall have the right to choose a representative when he/she responds to the allegations made.

6. INTERNAL COMMITTEE PROCESS

Once a complaint is received, the Internal committee may ascertain the complainant's preferred outcome, e.g. an apology, the behavior to cease, a change in working

arrangements and agree on the next step i.e., informal resolution or formal investigation. It will have two options:

(i) Try to settle the issue with mutual conciliation - In such case the victim and the accused have to appear before the internal committee as per the INTERNAL COMMITTEE decision. The INTERNAL COMMITTEE may enquire into the incident and if the both the parties agree, then settle the issue with mutual conciliation. The terms of conciliation has to be recorded in writing. A copy of the decision to be given to both, Once the reconciliation is reached, there will not be any need for further investigation. There shall not be any monetary payment involved in any conciliation decision. The INTERNAL COMMITTEE may take action in case of non compliance with the terms of settlement.

(ii) Proceed to investigate and if found guilty then take action against accused - If the INTERNAL COMMITTEE deems fit, then it may proceed with investigation.

Investigation process - On receiving a complaint, the INTERNAL COMMITTEE will:

- obtain and record a full, step-by-step account of the incident
- afford natural justice to all involved
- Interview all directly concerned, separately interview witnesses, separately
- keep records of the interviews and Investigation
- ensure confidentiality and minimize disclosure
- make a determination as to whether there is sufficient evidence that a reasonable person could conclude that an incident/incidents of sexual harassment as defined in this policy has occurred
- keep confidential record of all details of discussion and steps in the process.

The INTERNAL COMMITTEE shall provide a copy of the findings to both parties and it is necessary that the INTERNAL COMMITTEE provides equal and fair opportunity to the accused to submit his side.

7. FINAL DISPOSAL

Based on enquiry, if the accused is found guilty of misconduct, the INTERNAL COMMITTEE will:

- Determine appropriate action, which may include change of duty for harasser, change in

- working arrangements or dismissal based on severity of the incident.
- determine such sum as may be paid by the guilty to the victim or her legal heir from the salary or wages of the guilty.
 - where it cannot be determined that an incident/incidents of sexual harassment has occurred, may still take action to ensure the proper functioning of the workplace but these actions should not prejudice any party. They will also continue to closely monitor the situation and provide retraining where required.
 - Record the findings in writing and submit its report to the management for implementing its recommendations.

8. MALICIOUS ACCUSATIONS

Where the INTERNAL COMMITTEE determines that the accusations were malicious and made with wrong intentions, it may take action against the complainant which shall be the same as those prescribed for the accused if proved guilty. The malicious intention should be established after proper enquiry and mere inability to substantiate a complaint or provide adequate proof need not attract any action.

9. LEAVE TO ACCUSE

If requested or if the condition of the victim so warrants, then the INTERNAL COMMITTEE may grant leave up to 3 months to the victim and such leave shall be over and above the normal leave that she is entitled to as an employee.

10. CONFIDENTIALITY

The identity and addresses of the aggrieved woman, respondent and witnesses, any information relating to conciliation and inquiry proceedings, recommendations of internal Committee and the action taken by the employer shall not be published, communicated or made known to press and media in any manner. The information regarding justice secured to any victim may be disseminated without disclosing the name, address, identity or any other particulars which may lead to identification of aggrieved woman and witnesses. Any violation of this clause shall be seriously taken and strict action will be taken against the violator.

11. ANNUAL REPORT

The INTERNAL COMMITTEE shall prepare in each calendar year an annual report and submit the same to the management. The report shall include, among other things, the

number of cases filed and their disposal in respect of all cases of sexual harassment. This information shall form part of the Annual report of the company.