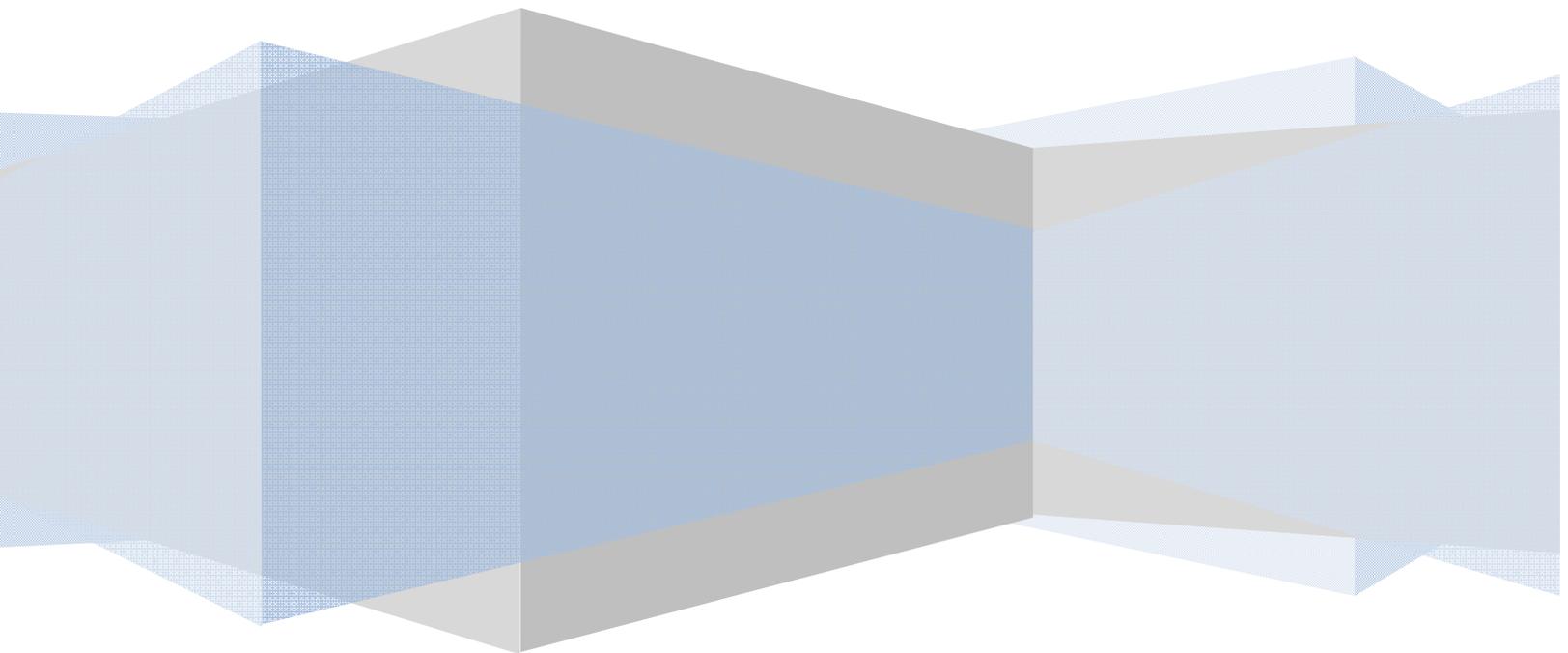




SEXUAL HARASSMENT POLICY



Document	Sexual Harassment Policy
W E F	09-Feb-2016
Approved By	Board of Directors (Meeting dated 09-Feb-2016)

1. Objective:

This policy has been formulated in compliance with the Grant Investrade Limited. Code of Conduct, regarding protection of employees from sexual harassment so as to create a work environment that is safe, civilised and supportive to the diversity and dignity of all our employees

2. Scope / Coverage: This policy shall be applicable to all GIL employees and associate companies including employees on deputation, contract, part-time, temporary or working as consultants

3. Definitions: Sexual harassment includes any one or more of the following unwelcome acts or behavior (whether directly or by implication) namely;

- Physical contact and advances or
- Demand or request for sexual favours or
- Making sexually coloured remarks or
- Showing pornography or
- Any other unwelcome physical, verbal or non-verbal conduct of sexual nature.

4. Sexual Harassment Includes:

- 4.1. Unwelcome or inappropriate sexually determined behaviour (whether directly or by implication) such as physical contact and advances.
- 4.2. A demand or request for sexual favours by promising promotion, pay increase or an easier work life.
- 4.3. Inappropriate sexual innuendoes or humour
- 4.4. Eve Teasing, sexually coloured remarks,
- 4.5. Any other unwelcome physical, verbal or non-verbal conduct of sexual nature,
- 4.6. Unnecessary and unwelcome references to various parts of the body,
- 4.7. Obscene gestures,
- 4.8. Showing pornography,
- 4.9. Belittling remarks to a person about his/her gender or sexual orientation,
- 4.10. Offensive sexual graffiti, pictures, or posters
- 4.11. Mobile Phone, E-mail and Internet uses that violates this policy, or use of the electronic mail system/ mobile phones to send offensive messages/pictures that contain sexual implications/innuendoes or any other comment that offensively addresses someone's sexual orientation. This will also include 'Wall-papers and Screen savers' on computer screens.

5. Who can complain : Any employee who feels sexually victimised can register a complaint

- 5.1. The victim may be a woman or a man. The victim does not have to be of the opposite sex

- 5.2. The complaint may be made against the victim's supervisor, a vendor of the company, a supervisor in another department/ region or a co-worker.
- 5.3. Sexual harassment can occur off business premises if the activity is related to employment (i.e. company picnic, dinner, etc.)

6. Sexual Harassment Committee (SHC)

- 6.1. The Sexual Harassment Committee comprises of following persons ;
 - 6.1.1. Presiding Officer (Woman employed at a Senior Level)
 - 6.1.2. Two members from among the employees
 - 6.1.3. One lady member from a non-governmental organisation committed to the cause of women.
 - 6.1.4. 50% of the members so appointed would be women.
- 6.2. Aggrieved employees should approach any of the committee members for a confidential discussion, and if their concern is deemed well founded, action will be taken against the offending individual without adverse recourse to them.
- 6.3. Names of Sexual Harassment Committee members will be displayed on the notice board.

7. Before registering a Complaint:

- 7.1. Clearly say NO to any unsolicited advances. Inform the harasser that his/her attentions are unwanted.
- 7.2. It should be clearly communicated that, the behaviour is offensive. If it persists, write a mail to the harasser asking him/her to stop and keep a copy of the same.
- 7.3. Employee is advised to keep a written, dated record of events. Write down each incident including date, time and place, details of what happened and your response.

8. Redressal Process

8.1. Registering a complaint

- 8.1.1. A Complaint for sexual harassment has to be made in writing within a period of three months from the date of incident.
- 8.1.2. In case the complainant is unable to make the complaint in writing due to physical or mental incapacity or death, his/her legal heir can make the complaint.
- 8.1.3. All possible help will be extended by the SHC to the complainant for making the complaint. The time limit of three months can be extended, in cases where the delay can be attributed to genuine circumstances.

8.2. Conciliation: Before initiating an inquiry, if the complainant so desires, the SHC should take steps to settle the matter between the complainant and respondent through conciliation.

- 8.2.1. No monetary settlement will be made on the basis of conciliation.
- 8.2.2. The settlement conditions agreed by both the complainant and respondent will be recorded and presented to the management and written copy of the same will be made available to both parties.

8.3. Investigation:

8.3.1. The SHC will initiate an inquiry under the following circumstance

8.3.1.1. When both parties are unable to agree upon a settlement via conciliation

8.3.1.2. If the respondent fails to adhere to the conditions agreed during the conciliation.

8.3.2. SHC members will interview the Complainant, the Respondent, and witnesses, if any; gather relevant documents and make a report of their findings.

8.3.3. During the inquiry any of the following action can be taken, on a written request made by the complainant

8.3.3.1. Transfer the complainant or the respondent to another branch/ location

8.3.3.2. Grant leave to the complainant for 3 months, This leave is over and above the employee's entitled leave

8.3.3.3. Any other action that may be deemed as appropriate by the management

8.4. Notification of findings: The SHC will submit a report of their findings along with their recommendations within 10 days of completing the inquiry, to the management. A copy of the report will also be made available to the complainant and respondent.

8.5. Recommendations: The SHC may recommend the following on the basis of their findings

8.5.1. The offence will be considered as misconduct and dealt with as per the conditions of employment agreement and non adherence of GIL Code of Conduct

8.5.2. Deduction of salary from the respondent, to be paid to the complainant to the extent deemed appropriate.

8.5.3. In case the allegations are found to be false or of malicious nature, appropriate action will be taken against the complainant

9. Non-retaliation : Retaliation of any sort against the Complainant or Respondent and other parties involved in the alleged harassment, or those consulted during the investigation will not be tolerated

10. Confidentiality: Complaints of sexual harassment are handled confidentially with the facts made available only to those who need to know in order to investigate and resolve the matter.

11. Obligation of the Management: Management of the Company shall provide all necessary assistance for the purpose of ensuring full, effective and speedy implementation of this policy.