

Sexual Harassment Policy

1.0 Preamble:

At Neptunus, we recognize the importance of providing an environment within the Organization that deters any form of sexual harassment, and protects any employee against any form of sexual harassment. The Management is committed in ensuring that any acts of Sexual Harassment shall be dealt with strictly, and this Policy applies to every member of Neptunus, past and present.

2.0 What is Sexual Harassment?

An individual may be committing an act of sexual Harassment if he/she indulges in any of the following:

- a) Passes statements or has conversations that contain swear words and expletives, or that directly include or indirectly suggest sexual content, without the consent of all members within hearing range.
- b) Sends a message in writing, verbally or in any electronic formats which has explicit sexual content.
- c) Stares, whistles, leers, or make gestures/sounds that are offensive or make someone else uncomfortable
- d) Plays suggestive videos, inappropriate suggestive songs or music, wear or remove clothing items from inappropriate body parts.
- e) Makes lewd remarks or compliments for extended periods on an individual's personal appearance. However, a genuine/causal compliment to a colleague on their appearance is not harassment.
- f) Stalks another individual. This includes calling, chasing or using any other way to follow or communicate with an individual without her/his permission, and in a matter not related to work.
- g) Initiates intentional physical contact
- h) Demands or requests for sexual favours
- i) Shows pornography in any form
- j) Acts in any other way that is physically or verbally infringing on the private space of an individual.

3.0 Who can be the victim?

Sexual harassment can occur between any two individuals, irrespective of gender and designation.

4.0 How shall we prevent Sexual Harassment at our workplace?

1. The policy shall be circulated to all employees, and will be frequently communicated to them.
2. Employees are urged to report any case of sexual harassment to any member of the Harassment Prevention Committee as soon possible. Strict confidentiality will be maintained.

5.0 Complaint Mechanism and the Harassment Prevention Committee (HPC)

1. The HPC shall constitute the **HR Head, the Directors and the MD**. A victim of harassment may choose to confide in another employee, who may then report the matter to the HPC.
2. Every such complaint shall be logged, and a detailed, unbiased enquiry shall be conducted and shall be closed within 14 working days.
3. Depending upon the nature of the offense, the Management will take suitable penal action.
4. The MD is always accessible to any employee to bring to his notice any grievance. Upon receiving any such complaint, he shall institute the enquiry.

6.0 Co-worker's Responsibility

It is the responsibility of every employee to report acts of Sexual Harassment being directed to any co-worker. Please do not be a bystander to Sexual Harassment. Please be proactive. Please report.

7.0 Disciplinary Action

1. Upon receiving a complaint of Sexual Harassment, the Management shall institute an enquiry.
2. Depending upon seriousness of the violation, the Management reserves the right to take any or all actions mentioned below :

- a. Suspension from Service
- b. Summary dismissal
- c. Informing the accused's family with a detailed letter explaining the misconduct.
- d. File an FIR with the closest police station

8.0 Protection of the person who complains against Sexual Harassment

1. The Management shall not discriminate against any individual who complains about Sexual Harassment or brings to notice a case of Sexual Harassment, and keep this information confidential.
2. The Management assures that the career paths or job prospects of all such persons complaining about Sexual Harassment shall not be affected.

9.0 False complaints of sexual harassment:

If after all enquiry it is determined that the complaint lodged was false and without any basis, the management may demote, suspend or dismiss the person lodging the complaint.

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