

SEXUAL HARASSMENT POLICY

Background

The Shakti Press Ltd is committed to creating a healthy 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 be treated with dignity. Sexual harassment at the work place or other than work place if involving employees is a grave offence and is, therefore, punishable.

It is the employer's responsibility to ensure a harassment-free workplace. To prevent sexual harassment at workplace the anti-sexual harassment policy is designed keeping in view that sexual harassment is still endemic, often hidden, and present in all kinds of organizations. Yet it is still not always viewed as a problem, which has to be systematically tackled. Thus to systematically tackle sexual harassment a policy is constructed at Shakti Press Ltd.

Applicability:

This policy applies to:

- All employees, regardless of seniority or contractual status, that is permanent, short-term contract, and casual employees,
- All Board members, executive and non-executive Directors, owners and shareholders,
- All applicants for employment, and
- All employees, workers, trainees (whether in the office premises or outside while on assignment)
- All persons dealing with the company, clients, customers, suppliers, and with whom employees interact personally or by telephone, or by electronic communication, including written communication, web-sites and emails.

Policy statement:

The company is committed to the implementation of, and compliance with, all employment legislation and in terms of this policy, particularly the Labor Relations Act, and the Code of Good Practice on the Handling of Sexual Harassment Cases.

Sexual harassment in the workplace is defined as a form of unfair discrimination, and is unacceptable behavior.

The company is committed to the implementation of the following procedures, to the training of all employees in what constitutes sexual harassment, how complaints may be lodged, and how the complaints should be dealt with by supervisors and managers.

What is Sexual Harassment?

A broad definition of sexual harassment consists of any physical or verbal behavior and any form of communication that has unnecessary, improper or unwelcome sexual connotations. Sexual harassment may vary in form depending on circumstances.

The content of the behavior may be:

- The behavior may be any single communication, or a range of communication, which may be verbal, or non-verbal such as touching or patting, or may be communicated by documents, or by telephone, cell-phone messages, web site communication, or emails.
- verbal sexual innuendo, such as: jokes, suggestions, or hints about sexual behavior, comments about physical appearance, particularly in front of others in a group, and particularly where there is a gender imbalance in the group such as a single woman in a group of men, or
- physical contact such as holding onto a hand or arm longer than is necessary, or touching particularly sensitive parts of the body, or
- non-verbal communication such as gestures of a sexual nature, removal of clothing to display parts of the body (flashing), or
- the display, giving or sending of offensive pictures, or verbally offensive material, particularly of a sexual nature,
- Demands or offers, such as for sexual attention, or to spend time together, or following, stalking, persistent visiting, telephoning, sending of cell-phone messages, or other invasions of personal privacy.

The behavior will be more seriously regarded if it is by a senior person to a more junior person, and particularly if it suggests any outcome following the behavior, such as:

- Recruitment, or promotion, or achieving a privileged position such as a board member, or special committee member,
- positive performance appraisal result, or career advancement,
- increased remuneration, or bonus, or allowances, or
- any other form of benefit or enhancement such as travel, particularly overseas, or training, or conference attendance or entertainment.

The behavior may be a single incident or continuous unwelcome behaviour.

The behaviour will be unwelcome, if the receiver of the behaviour has made it clear that the behaviour is offensive and unwelcome, or alternatively the person responsible for the behaviour should have known that the behaviour would be unwelcome or unacceptable, particularly where the receiver of the behaviour is junior and indicating that the behaviour is unwelcome to a senior would be difficult.

As technology advances, there are increased opportunities for the communication of sexually offensive verbal and visual images, therefore this policy anticipates a range of communication, all of which will be regarded as offensive regardless of the format or style of the communication, or whether the technology exists at the time of the publication of this policy.

Complaints Handling Process

(Reference to Prohibition of Sexual Harassment of Women at workplace Bill 2010) The company has established the following process to ensure that any incidence of sexual harassment is dealt with appropriately, sensitively and expeditiously.

Complaints Committee for Sexual Harassment

The company has established a Complaints Committee for Sexual Harassment the names of the members of this Committee and their contact details are given below.

Sl. No.	Post of Committee Members	Employee Name	Mobile Number	E-mail id
1	Whole Time Director	Shailja Sharma	9890003601	shailjasharma10@gmail.com
2	Director	Shantanu Sharma	9970654320	shantanusharma1970@gmail.com
3	Company Secretary	Ritu Patel	8329307669	agrawal.ritu9@gmail.com

Mr. Raghav Sharma, MD of the Company will provide all necessary support to the work of this Committee.

The Committee may seek the advice of any third party who it feels will be able to provide special assistance to the Committee in dealing with such issues.

Process for dealing with incidents of Sexual Harassment

- Any employee who experiences sexual harassment can get in touch with any member of this Committee whose contact details are provided above for convenient and confidential access. Alternatively, the affected employee may approach any senior executive and such senior executive will be expected to inform a member of the Committee immediately. All such complaints shall be in writing with full details of the incident.

- On receipt of such a complaint, the Committee will immediately arrange to fully investigate all relevant details of the matter. It will do so with all possible care, sensitivity and discretion in protecting the sensibilities of the effected employee. The employee or employees, who have allegedly committed the offence, would be given all reasonable opportunity to be heard by the Committee.

- The result of this investigation will be formally recorded and communicated to the Managing director of the Company, along with a recommendation for appropriate action.

- The Committee will normally complete this process and make its formal recommendation within 21 days after receiving the complaint unless there are exceptional circumstances.

- In the case of a multi location context, one of the committee members will travel to the location in question as is required to ascertain the facts based on which the committee would discuss and assess the complaint in question.

- Necessary action will then be taken with regard to the offending employee or employees based on the circumstances and seriousness of the offence.

- Where the Company is legally advised that any such incident constitutes a criminal offence, the Company will inform the relevant authority, provide full details and request appropriate action. If the aggrieved employee directly takes any action, against the offending employee, either civil or criminal, the Committee, on becoming aware of such action by the aggrieved employee, shall be entitled to, suo moto, start the internal enquiry / investigation and recommend appropriate action.

- The Company will ensure that the career interests of the complainant are not adversely affected by virtue of the individual having drawn attention to such an offence.

- In order to ensure that this important matter is not trivialized, any complaint, which, in the opinion of the Committee, is blatantly false or frivolous or has been motivated by reasons that are clearly unconnected with gender issues, would be viewed very seriously by the company and appropriate action taken against such complainants.

- If the Committee receives an anonymous reference related to sexual harassment, it will draw the attention of the senior executives concerned with the relevant business or location. The matter will be fully examined by the concerned senior management and its conclusions and plans for necessary action will be communicated to the

Committee.

- Heads of departments and senior executives at all company locations will also be expected to be sensitive to any circumstances or behavior among their colleagues which appear to go against the company policy on this matter. In case they become aware of any such incidence, they will immediately inform the head of the Committee and take appropriate action as advised.

Management Responsibility

- Management has a general responsibility to ensure that all allegations of sexual harassment are handled in a sensitive manner, with respect for the dignity of the persons involved.
- Management have an additional duty to ensure a safe and secure workplace, and if there is any indication that there may be a physical threat of danger to any person, professional advice should be sought from internal persons responsible for safety and security, and where appropriate from external authorities and professional persons.
- Management is responsible for ensuring that the allegations are dealt with timeously, with due seriousness and confidentiality; and that the allegations are dealt with in a manner which achieves a resolution of the behaviour, rather than in a mechanistic procedural manner

Physical and Mental Health

- Management may seek appropriate professional advice and arrange for trauma counseling for the complainant; where this is required the initial trauma counseling should take place within a few days of the incident; follow-up counseling over a longer period may also be necessary.
- Leave of absence may also be necessary, and Management will give permission for this, and if the complainant's sick leave entitlement is exhausted, additional sick leave may be granted.

Training and Development

- All Senior Management and Managing Director are required to attend executive briefings on their legal duties and responsibilities in the handling of sexual harassment allegations.
- All Management and Supervisors are required to attend the training on how to handle

allegations of sexual harassment brought to their attention, either informally, or as part of the formal Grievance Procedure.

- All new employees are required to be made aware of this policy and to be encouraged to ask questions and to seek clarification on any aspect of the policy which is not clear.
- Skills training is also be required for those who may receive the complaints, not only on how to deal with the complaints, but also mediation and conflict resolution skills, and delegates to these training workshops should include: members of the employment equity consultative forum, shop stewards, supervisors, managers, and human resource personnel.