

SEXUAL HARASSMENT POLICY

Objective

To maintain a work environment that is free of sexual harassment.

Sexual Harassment

Sexual harassment is one specific prohibited type of harassment. Unwelcome or unwanted sexual advances, requests for sexual favors, and other physical, verbal, or visual conduct constitute sexual harassment. It is harassment when (1) submission to the conduct is an explicit or implicit term or condition of employment, (2) submission to or rejection of the conduct is used as the basis for an employment decision, or (3) the conduct had the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile, or offensive working environment.

Sexual harassment may include sexual propositions, sexual innuendoes, suggestive comments, excessive flattery, questioning of a personal nature, repeated requests for dates, sexually oriented "kidding," "teasing," or "practical jokes," jokes about gender specific traits, offensive or obscene language or gestures, leering or staring, whistling or hooting, offensive or obscene printed materials, pictures, posters, cartoons, graffiti, calendars, or e-mail, sms messages and inappropriate physical contact or touching of a sexual nature (e.g., brushing, patting, hugging, pinching, or shoulder rubs).

All employees are responsible for helping to assure a workplace free of harassment. The Company forbids retaliation against anyone who has reported harassment or participated in an investigation.

All of us must recognize that such behavior not only violates the rules of common courtesy and is a violation of the Company's policy, but also is illegal under labour laws. It is the Company's policy to investigate all reports or complaints of harassment thoroughly and promptly. If an investigation confirms that harassment has occurred, the Company will take appropriate corrective action, up to and including termination.

Process for dealing with incidents of sexual harassment

- All employees who believe that they have experienced or witnessed harassment are strongly urged to notify the Harassment Redressal Committee headed by Ms. Shalini Jagdish - General Manager-Network Services Division, Ms Moon Moon Rajesh Palwankar - General Manager-Organization Development, Peoples Office, Mr. Vijay Vij - Director, Mr. S N Jadhav - Chief Peoples Officer, Mr. L Y Desai - Dy. COO, and Ms. Nicholas Shirley Menezes - Executive-CSR.
- Any employee who experiences sexual harassment can get in touch with any member of this Committee whose contact details are provided below 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 to the committee shall be in writing with full details of the incident, in a closed cover marked "Confidential" and addressed to "The Complaints Committee". The format for lodging the complaint is given in Annexure1.

- If the allegation of sexual harassment is against the employer {as defined in "The Sexual Harassment of Women at the Workplace, (Prevention and Redressal) Bill, 2004}, Chapter 1, sub section i) of the aggrieved woman she may lodge the complaint with the District Level Special Officer (Office of the Dy. Commissioner of Labour, Champion Compound, Nooribaba Darga Road, Near Makhmali Talao, Thane – 400 601. Tel Nos. 91-022 – 25346220/30), as stipulated in Section 11.
- 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. During the enquiry procedure the complainant and the accused will be called separately so as to ensure freedom of expression and an atmosphere free of intimidation. The complainant will be allowed to be accompanied by one representative during the enquiry. The employee or employees, who have allegedly committed the offence, would be given all reasonable opportunity to be heard by the Committee.
- The Committee will normally complete this process and make its formal recommendation within 15 days after receiving the complaint unless there are exceptional circumstances.
- The result of this investigation will be formally recorded and communicated to the Chairman & Managing Director along with a recommendation for appropriate action.
- Necessary action will then be taken with regard to the offending employee or employees based on the circumstances and seriousness of the offence. {As defined in "The Sexual Harassment of Women at the Workplace, (Prevention and Redressal) Bill, 2004}, (Chapter VII, Page 11, under sub section v – Minor and Major Penalties).
- Where the Company is legally advised that any such incident constitutes a criminal offence under the Indian Penal Code or under any other law; it shall be the duty of the member of the committee/ District Level Special Officer who receives such a complaint to immediately inform the complainant of her right to initiate action in accordance with law with the appropriate authority. 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 superior 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 or receive any complaint from an employee with respect to the same, the HR member of the Branch council should be immediately informed on that, who will be responsible to forward the complaint to the Central Redressal Committee and take appropriate action as advised.
- At any stage after filing of a complaint and during any proceedings in respect of it under this Act by the Complaints Committee, the aggrieved woman shall have the right to withdraw the complaint and the Committee/ person shall permit her to withdraw the complaint and if an inquiry has commenced, shall discontinue the inquiry.

Contact Details of Harassment Redressal Committee :

Email Ids	Mobile Nos.
shalinij@gtllimited.com	91 - 9819503377
moonmoons@gtllimited.com	91 - 9833887079
vijayvij@gtllimited.com	91 - 9819243644
snjadhav@gtllimited.com	91 - 9820054235
lydesai@gtllimited.com	91 - 9920203366
shirley@gtllimited.com	91 - 9920368712

Note :

- I. The policy will be overall governed by "The Sexual Harassment of Women at the Workplace (Prevention and Redressal) Bill, 2004". The copy of the Bill is available at our Corporate HR office, Mahape.
- II. Enclosed please find in Annexure 1, a format that will be used by the complainant to register his complaint.
- III. Enclosed please find in Annexure 1, a format that will be used for recording the Action to be taken against the accused person with respect to any case on Sexual Harassment.

This policy is with effect from May 24, 2004.