

# SHANTNU INVESTMENTS (INDIA) LIMITED

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## Prevention, Prohibition and Redressal against Sexual Harrasment of Women Employees

### INTRODUCTION

The protection against sexual harassment and right to work with dignity are universally recognized human rights, and the Company (**Shantnu Investments (India) Limited**) strongly believes in and is committed to providing equal opportunity to women in the employment, safe working environment, due respect and dignity during their association with the Company. Therefore, everyone in the Company is expected to accord due respect and dignity to the women through their acts, conduct and behavior.

The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, have come into force, w.e.f. 9th Dec, 2013 and Rules made there under have also been notified from the same date.

Therefore, keeping the above in view, the Company has finalized its formal policy for implementation on Prevention, Prohibition and Redressal against Sexual Harassment of Women Employees.

### OBJECTIVE

The objective of this policy is to provide protection against sexual harassment and mechanism for prevention and redressal of complaints of sexual harassment and for matters connected or incidental thereto of women employees of the Company at work place. .

### PURPOSE

The purpose of this policy is to communicate that the Company has a “zero tolerance” approach towards sexual harassment to women at workplace.

The policy actively advocates the right of every Women employee to work in an environment free of all forms of sexual harassment – verbal, written, physical, visual or otherwise.

### SCOPE

The policy covers all Women employees of Shantnu Investments (India) Limited.

## DEFINITIONS

**“Company”** means **“Shantnu Investments (India) Limited”**

**“Employee”** means a person employed at a work place of the Company for any work on regular, temporary, adhoc or daily wages basis either directly or through an agent, including a contractor and includes a co worker, a contract worker, probationer, trainee, apprentice or called by any other such name.

**“Sexual harassment”** includes any one or more of the following unwelcome acts or behavior (whether directly or by implication) namely:-

(i) Physical contact and advances; or

(ii) A demand or request for sexual favours; or

(iii) Making sexually coloured remarks; or

(iv) Showing pornography; or

(v) Any other unwelcome physical, verbal conduct of sexual nature:

(vi) Further, the following circumstances, among other circumstances, if it occurs or is present in relation to or connected with any act or behavior of sexual harassment may amount to sexual harassment:

(a) Implied or explicit promise of preferential treatment in employment; or

(b) Implied or explicit threat of detrimental treatment in employment; or

(c) Implied or explicit threat about present or future employment status; or

(d) Interference with her work or creating an intimidating or offensive or hostile work environment for her; or

(e) Humiliating treatment likely to affect health or safety.

**“Authorized Person”** means Mrs. Pragya Agarwal, the Managing Director of the Company.

**“Competent Authority”** means Audit Committee.

## COMPLAINT

Any aggrieved women may make, in writing, a complaint of sexual harassment, at workplace to the Authorized Person within a period of 3 months from the date of incident and in the case of a series of incidents within 3 months from the date of last incident. But, it is expected that any such matter must be reported as early as possible to the Company without any delay in the larger interest of justice.

Provided, the Authorized Person may for reasons to be recorded in writing, extend the time limit not exceeding three months, if it is satisfied that the circumstances were such which prevented the employee from filing a complaint within the said period.

## **ENQUIRY REPORT**

Authorized Person shall provide report of its finding to the Competent Authority and to the Management of the Company within 10 days of completion of the enquiry. The report shall also be forwarded to the concerned parties.

## **MANNER OF TAKING ACTION FOR SEXUAL HARASSMENT**

The Authorized Person can recommend such action as it may consider appropriate and judicious in the circumstances of the matter including a written apology, warning, reprimand or censure, suspension, withholding of promotion, withholding of pay rise or Increments, terminating the respondent from services, or undergoing a counseling session or carrying out Community Service etc. to the Competent Authority. If the Competent Authority is satisfied that the recommendations are based on findings and are judicious, it may accept the recommendations.

## **PUNISHMENT FOR FALSE OR MALICIOUS COMPLAINT**

Where the Authorized Person arrives at a conclusion that the allegation against the respondent is malicious or the aggrieved women or any other person making the complaint has made the complaint knowing it to be false it may recommend to take action against the women for the misconduct as per rules, including termination of service and actions as warranted under the applicable provisions of criminal law.