

Workplace Harassment Policy

The supreme court of India ruled:

"It is necessary and expedient for employers in work places as well as other responsible persons or institutions to observe certain guidelines to ensure the prevention of sexual harassment."

Definition:

There are 2 distinct kinds of Sexual harassment

- **Quid Pro Quo ("this for that")**

Submission or rejection of such conduct by individuals is used as the basis for employment decisions affecting such individual. Quid Pro Quo harassment is the easier form of harassment to identify because it takes the form of either a threat or a promise, whether explicit or implied.

- **Hostile Environment Harassment**

Includes unwelcome advances, requests for sexual favours, or other verbal or physical conduct where such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile or offensive working environment.

Coverage: This policy covers all employees (payroll or contract) Turnstone Global at all locations including marketing offices and client locations.

Policy:

- Employees are expected to maintain a productive work environment that is free from harassing or disruptive activity. No form of harassment will be tolerated, including harassment for the following reasons: race, caste, religion, disability, age, or sex. Special attention should be paid to the prohibition of sexual harassment.
- Each employee has a responsibility to keep the workplace free of any form of harassment, and in particular, sexual harassment. No employee is to threaten or insinuate, either explicitly or implicitly, that an employee's refusal or non-willingness to submit to any advances will affect the employee's terms or conditions of employment.
- Other harassing or offensive conduct in the workplace, whether committed by employees, or non-employees, is also prohibited. This conduct includes:
 - a) Unwanted physical contact or conduct of any kind, including flirtations, touching, advances or propositions;
 - b) Verbal harassment of a sexual nature, such as lewd comments, obscene jokes or references, and offensive personal references;

- c) Demeaning, insulting, intimidating, or suggestive comments about an individual's personal appearance;
- d) The display in the workplace of demeaning, insulting, intimidating, or sexually suggestive objects, pictures, or photographs;
- e) Demeaning, insulting, intimidating, or sexually suggestive written, recorded, or electronically transmitted messages.

Any of the above conduct, or other offensive conduct, directed at individuals because of their race, religion, disability, age, etc. is also prohibited.

- Any employee who believes that a manager's, other employee's, or non-employee's actions or words constitute unwelcome harassment has a responsibility to report or complain about the situation as soon as possible. The report or complaint should be made as per the procedure given below.
- All complaints of harassment will be investigated promptly and in an impartial and confidential manner. Employees are required to cooperate in any investigation.
- Any employee who is found to have violated the harassment policy will be subject to appropriate disciplinary action, up to and including termination. The company prohibits any form of retaliation against employees for bringing bona fide complaints or providing information about harassment. However, if investigation of a complaint shows that the complaint or information was false, the individual who provided the false information will be subject to disciplinary action, up to and including termination.

Reporting Procedure:

Anyone who has a complaint of harassment with respect to the workplace by anyone including employees, visitors, contractors, customers or any other person over whom the Company exercises some measure of control should immediately (within 90 days of the incident) bring the problem to the attention of the Human Resources and/or Compliance Officer (in case of sexual harassment) in writing.

Complaint Handling Procedure:

All complaints will be promptly handled by Compliance Officer. In case of sexual harassment, the Prevention of Sexual Harassment (POSH) Committee will look into the complaint. All proceeding will be handled on a confidential basis and appropriate corrective action will be taken to remedy all violations of this policy within 90 days of receipt of complaint.

The POSH Committee will be headed by a woman and will include a third party member. Both parties will be given an opportunity of being heard and a copy of the findings made available to both the parties to enable them to represent against the findings before the Committee.

Procedure of conducting inquiry

Step	Action	Time Period
Step 1	Filing of complaint	Within 3 months from date of incident or within 3 months from date of last incident. Extendable by ICC by 3 months
Step 2	ICC to send complaint to respondent	Within 7 working days of receipt of the complaint
Step 3	Respondent to file reply to the complaint to the ICC	Within maximum of 10 working days from receipt of complaint
Step 4	ICC to initiate action and complete inquiry	Within 90 days of complaint being filed
Step 5	ICC to submit report of its findings & recommendations to employer for implementation	Within 10 days of completion of inquiry
Step 6	Employer to implement recommendations of ICC	Within 60 days of receipt of report of ICC
Step 7	Complainant/respondent to file appeal to court/tribunal against any breach of ICC recommendation or non-implementation of recommendations.	Within 90 days of receipt of report of the ICC

Some Best Practices

- Updated list of ICC members should always be available on the internet or notice board
- Non-retaliation against any woman filing a complaint of sexual harassment
- Maintain utmost confidentiality of the complaint (including ensuring confidentiality is maintained by parties involved and witnesses)
- Endeavour to complete inquiry and submit report within prescribed timelines. Reasons for any delay should be well documented
- File annual reports with the authorities within prescribed timelines

Contact Details:

- Compliance Officer: Mrs. Jyostna Bannerjee
- Human Resources: Mr. Prokriti Bannerjee

Websites to refer: <http://pib.nic.in/newsite/erelease.aspx?relid=66781>
<http://www.eeoc.gov/facts/fs-sex.html>