

THE GOOD SAM FOUNDATION

POLICY FOR PREVENTION OF SEXUAL HARASSMENT (POSH)

GSF

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GSEF

POLICY FOR PREVENTION OF SEXUAL HARASSMENT (POSH)

1. PURPOSE:

To create and maintain safe work environment, free from sexual harassment & discrimination for all its employees. As per the guidelines of “The Sexual Harassment of women at workplace (prevention, prohibition & redressal) Act, 2013.

2. SCOPE:

The Good Sam Foundation (GSF) aims to adopt zero tolerance attitudes against any kind of Sexual Harassment or Discrimination caused by any employee during their tenure in GSF towards any other employee or other stakeholders in GSF.

3. APPLICABILITY:

All employees of GSF at all locations.

4. DEFINITION:

- 1. Employee of GSF** – Includes person carrying out any work on behalf of GSF and may have been hired as Permanent, Temporary, Contracted or on Voluntary, Part-time basis etc either directly or indirectly.
- 2. Sexual Harassment** – Harassment of a Female/Male employee consisting of any unwelcome sexually determined behaviour, whether directly, indirectly, by any male/female in charge of the management or a male/female co-employee either individually or in association with other persons to exploit the sexuality of co-employee to harass him/her in manner which prevents or impairs his/her full utilization of full benefits, facilities or opportunities or any other behaviour which is generally considered to be derogatory.
- 3. Aggrieved Women** - In relation to workplace, a woman of any age whether employed or not, who alleges to have been subjected to any act of sexual harassment by the Respondent.
- 4. Respondent:** Employees against whom the complaint has been filed.

5. POLICY GUIDELINES:

Sexual Harassment shall include but not be limited to:

- Physical contact & sexual advances
- Demand or request for sexual favours
- Sexually- coloured remarks
- Showing pornography
- Any other unwelcome physical, verbal or non-verbal or written conduct of a sexual nature.

6. GRIEVANCE MECHANISM: PROCEDURE TO REGISTER COMPLAINTS:

A complaint shall be submitted in writing to reachgsf@gmail.com or to any member of the Governing Body mentioned herein within 3 months of occurrence of an act of Sexual Harassment. If the respondent is direct supervisor of the complainant, or person influencing the career growth of the complainant, the reporting structure will be changed till the time the enquiry is completed.

7. INTERNAL COMMITTEE:

- A. Each complaint of Sexual Harassment shall be dealt with utmost confidentiality and urgency by a Governing Body consisting of:
1. Presiding Officer: Managing Trustee – Mr. David Istacky
 2. 1 Board Member: Trustee – Ms Nelly Prichard
 3. 1 Lady Member: Executive - Ms. Eden Istacky
 4. External Member: Advocate – Ms. Ransa Vasanthi
- B. Within 3 working days, the Governing Body shall commence Official Internal Enquiry by:
1. By informing the said complaint to the respondent.
 2. By instructing to stop the alleged act of Sexual Harassment immediately
 3. By informing not to reach out to the complainant directly or indirectly
 4. By asking an immediate explanation from him/her of the same
- C. Within 5 working days from the receipt of original complaint, the designated person from the Governing Body shall respond in writing to the complainant informing him/her about the initial steps taken by GSF in order to stop the alleged act(s)
- D. Within 15 days from receipt of the original complaint, the Governing Body shall record and accordingly communicate in writing to the complainant and the Respondent, its prima facie findings, upon giving the concerned parties a fair and due opportunity to represent themselves and upon conducting fact finding and initiate appropriate action or corrective sessions as is seen necessary.
- E. Employees are duty bound to assist wholeheartedly in the investigation. Whistle-blowers shall be protected from exposure, retaliation or hostility.
- F. Within 2 working days from receipt of prima facie findings or the charges, if the complainant or the Respondent is dissatisfied with the decision of internal committee, she or he may appeal specifying the reasons in writing to the Managing Trustee/ External Member/ Arbitrator of the Governing Body. Within 5 working days from the receipt, the appeal shall be finally disposed of by written communication to the said party.

8. REDRESSAL:

1. An amicable resolution of the complaint is possible only with the written consent of the complainant.
2. In case of decision establishing the offence of Sexual Harassment of the complainant, within 3 working days, the Governing Body shall recommend Disciplinary action against the offender considering the nature and extent of injury caused to the complainant, prior

complaints or repetition of offence etc and the impact of the offence on the company profile as a whole.

3. The position of the offender and the criticality of the position occupied by the offender shall not be of any hindrance to the disciplinary action taken against the offender.
4. The disciplinary action that shall be commensurate with the nature of the gravity of the offence, shall include but not limited to,
 - Warning
 - Written apology from offender,
 - Bond of good behaviour
 - Transfer
 - Debarring from supervisory duties
 - Denial of employee benefits like increments/promotion/salary correction etc.
 - Cancellation of specific work Assignment
 - Suspension
 - Dismissal
 - Legal prosecution

An Annual POSH report summarizing complaints and Redressal of Sexual harassment shall be prepared by a designated member of the management team and signed by all the members of the Governing Board. This report, along with all supporting documents regarding Sexual Harassment complaints shall be in the custody of designated member and will be termed as 'Strictly Confidential'.

Review of policy:

Trustees will revise the policy once in two years as seen necessary.

