



DOSTI GROUP

To,

11th August 2014

The Sr. Inspector
Shops & Establishments Department,
Municipal Office, A – Ward,
Mumbai - 400001

Respected Madam,

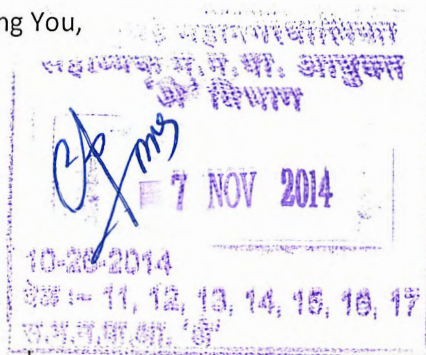
This is to notify that in alignment with "The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, we have defined our sexual harassment policy and have formed an internal committee to redress grievances related to the same.

Here is the list of members who are a part of the Sexual Harassment Internal Committee for Dosti Group:

Sr. No.	Name of the person	Designation
1	Mrs. Tejal R. Shah	Chairperson
2	Ms. Harshita Malkan	Member
3	Mrs. Nishtha N. Joshi	Member
4	Mrs. Suvarna P. Sawant	Member
5	Mr. Devendra C. Anjaria	Member
6	Mr. Sunil L. Rane	Member
7	Mr. Kartik H. Goradia	Member

Also, we are submitting the Company's sexual harassment policy along with this notification.

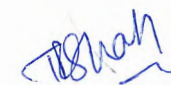
Thanking You,



Encl: As above

Yours sincerely,

For Dosti Group


Tejal Shah

(Chairperson)

**Policy against Sexual
Harassment At Workplace**

1. Objective

- To set forth the expectations of conduct and mutual respect in regard to sexual harassment and the process of complaint if these expectations are not met or violated.
- To articulate the company's strong opposition to sexual harassment and to identify penalties that can be imposed for such prohibited conduct.
- To establish clearly that this Company is committed to providing a work environment that is free from discrimination and harassment in any form.

This policy seeks to assist individuals who believe they have been subjected to such behaviour with appropriate support and remedial action.

2. Scope

- This policy is applicable to all employees of Dosti.
- All contract employees, retainers, trainees and temporary employees are also expected to abide by this policy .

3. Definition of Sexual Harassment

Sexual harassment has many different definitions and it is not the intent of this policy to limit the definition of sexual harassment, but to give employees as much guidance as possible concerning what activities constitute sexual harassment.

The Supreme Court, in their guidelines (Vishaka Guidelines), defines sexual harassment as "**any unwanted and unwelcome sexually oriented behavior**". Such an act vitiates the working environment.

Sexual Harassment includes such unwelcome sexually determined conduct (Whether directly or by implication) as:

3.1 Physical Harassment, which includes:

- Physical contact and advances
- Intentional touching, pinching, grabbing, brushing against another's body
- Sexual assault
- Cornering, trapping or blocking another's pathway
- Excessively lengthy handshakes
- Any physical conduct which is unwelcome

3.2 Verbal Harassment, which includes:

- A demand or request for sexual favors over promises related to employment such as work conditions, promotion, and increments. This is known as "quid pro quo" sexual harassment.
- Gesture-based harassment: sexually colored remarks
- Making sexually suggestive or off-color comments, threats, slurs, sexual propositions
- Sexual jokes or teasing, misogynist humor, sexually colored gender specific jokes
- Innuendoes and off-color remarks
- Comments about how someone looks, especially about parts of the body
- Catcalls, whistles and forms of address like "honey", "sweetheart", etc.

3.3 Written Or Graphic Harassment, which includes:

- Showing pornography, and
- The display of pornographic material
- Written material that is sexual in nature such a letter or notes containing a sexual comment
- Leering or staring at another's body and/ or sexually suggested gesturing
- Displaying sexually visual material such as pinups, cartoons, graffiti, computer programmes, catalogues of a sexual nature
- Any Other Unwelcome Physical, Verbal Or Non Verbal Conduct Of Sexual Nature



4. Redressal Mechanisms:

4.1 Sexual Harassment Redressal committee

4.1.1 Given below is the committee formed by the Dosti Group for addressing concerns related to sexual harassment:

Sr. No.	Name of the person	Designation
1	Mrs. Tejal R. Shah	Chairperson
2	Ms. Harshita Malkan	Member
3	Mrs. Nishtha Joshi	Member
4	Mrs. Suvarna P. Sawant	Member
5	Mr. Devendra C. Anjaria	Member
6	Mr. Sunil Rane	Member
7	Mr. Kartik Goradia	Member

4.1.2 A member of the redressal committee shall be especially designated as a **Redressal Advisor**.

4.1.3 Each manager/ supervisor must treat every complaint of harassment communicated to him or her seriously by immediately contacting the Redressal Committee. The complaint can be either raised by the affected person or by any employee who has witnessed such behavior.

4.1.4 All managers, supervisors should ensure that there is no retaliation or reprisal in any way against anyone who has complained about or resisted harassment, discrimination or retaliation. Retaliatory behavior and attempts to cover up such retaliation or reprisal should also be strictly discouraged.

4.2. The company will keep complaints, investigative records, and the results of the investigation confidential. If an investigation confirms that harassment has occurred, the company will take corrective action, including appropriate disciplinary action, up to and including termination.

4.3. Redressal Procedures

The redressal procedures shall be sensitive to the particularly delicate nature of complaints related to sexual harassment.

4.4. Redressal System:

For complaints, the redressal advisor shall advise the complainant to register a written complaint for a formal redressal. The steps of this process are:

Receipt of complaints

All complaint should be in:

- Writing to ensure consistency and accuracy.
 - State the name of the alleged offender including designation and contact numbers
 - State the date and location of the alleged incident/s of harassment
 - A detailed description of the incident in question as well as other relevant circumstances,
 - Names of witnesses and physical and/or documentary proof if any that supports the allegation including other potential complaints, if any
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- At this level the strictest confidentiality shall be observed, therefore restricting all information generated to the smallest possible group.
 - The committee shall notify in writing, the time and date of the meeting that should be fixed after receiving the complaint. The complainant and the alleged harasser should be given a written notification to present themselves before the committee.
 - A copy of the statement of the complainant should be given to the alleged Harasser who will be allowed sufficient time to present his case before the committee.

Investigation

- Immediately following the complaint, the redressal committee must nominate two persons from the committee to carry out confidential investigations.
- In this process it should be ensured that at all times the dignity of both the complainant and the alleged harasser is respected.
- The committee shall hold the power to summon any employee for the purpose of investigation that it may deem necessary.

- The report of the investigation should be submitted to the redressal committee one working day before the committee convenes for the hearing. The complainant and the alleged harasser will also receive one copy of the report
- Minutes will be taken down to record proceedings

4.5 Communication

- The findings of the committee will then be informed to the parties in writing along with the actions to be carried out by HR.
- The disciplinary action recommended by the redressal committee should be disclosed to the alleged harasser and the complainant separately.

4.6 Disciplinary Actions in case of redressal mechanism:

- A letter of warning will be placed in the personal file for the offence that is deemed minor by the Redressal Committee.
- Suspension, Demotion, transfer, pay reduction or compensation to the complainant could also be the actions taken depending on the severity of the case.
- Action may vary from warning to termination of services, depending upon the intensity of violation of conduct.

5 Protection against retaliation

Retaliation is a serious violation of this policy. DOSTI GROUP forbids any form of retaliation against anyone who has reported a suspected episode of harassment or has cooperated in any investigation involving a reported case. (Examples of retaliation may include - but are not limited to - threatening a negative action on terms of employment, unsubstantiated negative performance evaluation, continued harassment in any form, discriminatory treatment or failure to provide or consider individual concerned for a company benefit or for a warranted role, title, training or promotion).

If anyone feels that he/she is experiencing retaliation of the nature of intimidation, pressure to withdraw the case or threats for reporting, testifying or otherwise participating in the proceedings, should report the matter to the Redressal Committee.

As with complaints of harassment, this too will be treated as misconduct and DOSTI GROUP will take appropriate action to prevent/rectify the retaliation. It will be treated as seriously as an alleged case of harassment and will apply even if the original complaint is not proven.

Similarly, bringing undue influence whether directly or indirectly, to the proceedings of an Inquiry by either party will be treated as misconduct and be subjected to disciplinary action.

6 Appeals and Alternate Remedies

An employee who feels that a harassment or retaliation complaint did not receive prompt and fair response may contact Head - HR.

Either party subjected to administrative or disciplinary action may appeal against such actions to the Managing Director of DOSTI GROUP within 3 working days after conclusion of the investigation and communication of the consequences.

Additionally, nothing in this policy shall prevent the complainant or the respondent from pursuing formal legal remedies or resolution through Govt. agencies or the courts of law of the country.

7 Treatment Of False Complaints/ Allegations

7.1 This is a very sensitive area and any allegations/ complaints, however discreetly handled, could prove derogatory for the person against whom it has been raised.

7.2 Baseless allegations should therefore be strictly avoided.

7.3 In the case where a false complaint has been filed the investigation has proved that the motivation of the complaint was purely to defame the alleged Harasser, disciplinary action shall be initiated against the complainant.

8 Delay in Filing the Complaint

DOSTI GROUP encourages prompt reporting of sexual harassment complaints so that timely and appropriate action can be taken. A complaint regarding harassment can be made in writing within 30 calendar days, however due to the sensitivity of this issue and

the emotional toll that may have been experienced, a delay may be considered favorably by the Committee, provided the complainant submits sufficient cause for such delay.

The Committee shall also receive complaints, as per this Policy, from an employee who has experienced such harassment during his/her employment, but has since left DOSTI GROUP, so long as the complaint is received in writing within 3 months from the date of his leaving the company.

9 Consensual Sexual Relationships

DOSTI GROUP discourages romantic or sexual relationships between a member of management or other supervisory employee and his or her staff (an employee who reports directly or indirectly to that person); as such relationships could lead to conflicts of interest at work.

It is therefore in the best interest of all concerned, that if there is such a relationship, the involved parties notify management so the reporting chain can be changed to ensure no direct or indirect reporting relationship exists.

10. Evaluation of Policy

- The Sexual Harassment Policy shall be evaluated so that any amendments required may be recommended by the Redressal Committee based on their experience of dealing with complaints
- The exercise shall be an annual exercise at the minimum. The Policy will be flexible to amendments to address situations that the policy has not covered at the onset.

Note: Those who are unsure of what is the appropriate resolution process to use may speak with the HR focal point to make a more informed decision.

