

Anti-Sexual Harassment Policy

INTEC/HR/AP/2020-21/01

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1.0 OBJECTIVES

Intec Capital Limited is an equal employment opportunity provider and does not discriminate its employees on the grounds of gender and believes in providing a non-hostile safe working environment to all its employees especially to its female employees.

Anti-Sexual harassment policy of Intec Capital Limited is a statement by the company stating that Intec as a company will not tolerate or allow any sexual harassment by any manager, supervisor, co-worker, client/customer or any other person that the employee of the organization comes with in the course of work or business of the company.

2.0 COVERAGE

All employees and consultants of Intec Capital Ltd.

3.0 SALIENT FEATURES

As sexual harassment is an offence to the dignity of the individual, it constitutes an obstacle to an efficient environment in which men and women work together, we have set guidelines and procedures to be followed at such instances occurring at the place of work

4.0 DEFINITION

Sexual harassment includes such unwelcome sexually determined behavior (whether directly or by implication) as:

- Physical contact and advances
- A demand or request for sexual favours
- Sexually coloured remarks
- Any other unwelcome physical, verbal or non-verbal conduct of sexual nature.

The following circumstances, along with above ,if it occurs or is present in relation to or connected with any act or behavior of sexual harassment may amount to sexual harassment:-

- Implied or explicit promise of preferential treatment in employment: or
- Implied or explicit threat of detrimental treatment in employment :or
- Implied or explicit threat about present or future employment status :or
- Interference with work or creating an intimidating or offensive or hostile work environment; or
- Humiliating treatment likely to affect health or safety.

5.0 POLICY GUIDELINES

- As sexual harassment is regarded as misconduct, it is the duty of management and employees to take active steps to ensure that female employees are not subjected to this form of degradation in the workplace.
- In the case of any allegation of sexual harassment, whether or not it is found to be an incident of sexual harassment, management must ensure that any victimization that may later result from lodging the complaint is dealt with most severely. Disciplinary steps will be taken against personnel who victimize or intimidate a complainant.
- All information must be treated with the utmost confidentiality. Parties involved in an allegation of sexual harassment are, in their own best interest, advised not to discuss the matter with colleagues who are not involved and who are not representing them in the matter.

6.0 COMPLAINT REDRESSAL COMMITTEE

A Committee known as “Internal Complaints Committee” has been constituted by the Management to consider and redress complaints of Sexual Harassment

A committee of minimum 3 members, majority of which will be women, is constituted for the proceedings to take place. In case of non-availability of quorum members due to exigency of official work, it shall be the responsibility of HR to get the complaint investigated.

Details of Committee members:

S.No.	Name	Role	Designation	Department	email id	Contact No.
1	Ms. Anju Srivastava	Presiding Officer	Chief Manager	Finance & Accounts	anju@inteccapital.com	9582555708
2	Mr. Sanjeev Goel	Committee Member	Managing Director	NA	Sanjeevgoel@inteccapital.com	9810084548
3	Ms. Chandan	Committee Member	Manager	Legal	chandan@inteccapital.com	9582555722
4	Ms. Kumud Gupta	Committee Member	Non –Executive Independent Women Director	NA	kumudgupta75@gmail.com	9811100679
5	Ms. Shashi Kala	Committee Member	External – Committee Member	NGO	shashipresent@gmail.com	9811263812

7.0 REDRESSAL PROCESS

- Any employee who feels and is being sexually harassed directly or indirectly may submit a written complaint of the alleged incident to any member of the Committee/ HR Team / hrsupport@inteccapital.co.in in writing with his/her signature immediately within a period of 3 months from the date of incident and in case of series of incidents, within a period of 3 months from the date of last incident.
- The Committee will hold a meeting with the complainant within 3 days of receipt of complaint of the incident.
- The Committee shall call upon all witnesses mentioned by both the parties.
- If the Complainant desires to tender any documents by way of evidence before the Committee, she/he can submit original copies of such documents. Similarly, if the person against whom complaint is made desires to tender any documents in evidence before the Committee he/she shall supply original copies of such documents.
- The Committee shall complete the "Investigation" within reasonable period but not beyond 15 days and communicate its findings and recommendations to HR.
- On the recommendation of the Committee appropriate action will be taken by HR.

8.0 Protection against Victimization

The following will be obligations of the Company, during the processing/investigation of the Complainant:

- In the event the Accused is the Complainant's Reporting Manager/senior, the Company will review the possibility of relocating the employee within the Company and ensure that the Complainant is not being evaluated by the Accused.
- Ensure that any sort of retaliation against the Complainant or witnesses is strictly prohibited. Any act of reprisal, including internal interference, coercion and restraint, by the Accused, whether directly or indirectly, will result in appropriate action against the Accused by the Complaints committee in consultation with the Management.
- In case the Accused is a third party interacting with the company, such accused shall not be allowed to enter the company premises except for the purpose of attending any meeting/interaction as and when required by the Complaints Committee Post Conclusion of the Investigations of the Complaint, the Company will observe the following:
- If the Accused is found to be guilty, the Accused shall not write the evaluation/reports of the Complainant, if she is otherwise authorized to do so.
- In case the Accused is a third party interacting with the company, and found to be guilty, the Accused shall not be allowed to enter the Company premises.
- In the event, the Complaints Committee after investigation of a Complaint in accordance with the procedure prescribed herein, concludes that the Complaint was false and made with mollified intention by the Complainant, then the Complaints Committee shall take such appropriate measures, in consultation with the Management, against the complaint, as it may deem necessary.

9.0 Criminal Proceedings

In case the act under sexual harassment amounts to a specific offence under the Indian Penal code, 1860 or under any other applicable law, the Management shall initiate appropriate action, in accordance with law, by making a complaint with the appropriate authority.

10.0 Modification and Review of the Policy

- The Company reserves the right to modify and, or, review the provisions of this Policy, so as to comply with applicable legal requirements, internal policies, or with a view to align/after the provisions of the policy to the extent deemed necessary by company from time to time.
- Intec expects the cooperation of all personnel in making this policy work. The company's intent in preparing, implementing, and distributing this policy is to help ensure compliance with state and local laws. This policy is not intended to impose any contractual obligations on the company or any of its personnel. Questions about this policy should be directed to Human Resources.