

## Sexual Harassment Prevention (SHP) Policy



BAUER CORPORATE SERVICES PRIVATE LIMITED (BCS) is committed to building a safe environment for all employees, which is free from any form of sexual harassment.

- Sexual Harassment is a form of harassment that includes such unwelcome acts or behavior (whether directly or implied) as:
  - a) Physical contact or advances, ranging from touching to serious assault, including blocking normal movement
  - b) A demand or request for sexual favours
  - c) Leering
  - d) Sexually coloured remarks
  - e) Showing pornography or other such inappropriate material
  - f) Any other unwelcome behavior
  - g) Suggestive jokes, remarks, innuendo, offensive gestures
  - h) Sharing unwelcome content via text, email, social media, etc.
  - i) Unwelcome phone calls
  - j) Any other unwelcome physical, verbal or non-verbal conduct
- Employees who feel they are a victim of harassment should report the situation/incident to any of the Internal Committee (IC) members. The complaint has to be made in writing in the prescribed format, available with the IC members. The IC committee has been formed specifically to deal with complaints regarding Sexual Harassment at the workplace.
- Workplace includes office premises, any branch or department, site, any place visited by the employee arising out of or during the course of employment, including commuting.
- The matter will be thoroughly investigated immediately on a confidential basis, and where appropriate, disciplinary action or termination of employment will occur.
- Employees will not be penalized in any way for reporting such conduct concerning them.
- It is the employee's responsibility to bring complaints and concerns to management's attention, so that management can help to resolve them.

All Managers/Team Leaders at BCS are responsible to ensure that no harassment is tolerated at the workplace. Managers/Team Leaders must institute measures so that this menace is non-existent and all work in a healthy and clean environment.

Harassment may occur at the workplace itself or it may occur outside the workplace in a situation that is in some way connected to work. This could include off-site conferences, meetings, delivery trips etc. Employees are encouraged to speak up if someone behaves in a way that offends, humiliates or degrades them and report the matter to any member of the IC committee. Complaints can be in local language. Assistance will be given to employees to write the complaint.

**At BAUER Corporate Services Private Limited, it is the moral responsibility of each employee to ensure that their behavior does not have a negative impact or hurts the feelings of their co-workers.**

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### Internal Committee (IC)

The IC committee comprises the following:

- |                          |                 |
|--------------------------|-----------------|
| 1. Swati Rane:           | Chairperson     |
| 2. Priya Shetty:         | Member          |
| 3. Shyam Khemani:        | Member          |
| 4. Eera Bhatt:           | Member          |
| 5. Dr. Anagha Sarpotdar: | External Member |

The Committee besides taking formal complaints will carry out the following:

- 1) Will spread awareness of SHP policies
- 2) Will meet once a quarter to discuss any improvement initiatives on SHP aspects
- 3) Present a formal report on the effectiveness of SHP policies to management

The IC is formed with the good intention of maintaining a harmonious, harassment free and healthy work environment. It should not be used as a tool to settle professional or personal issues/differences.

**All concerned with the investigation must maintain the confidentiality of information presented before the committee.**



**SEXUAL HARASSMENT – COMPLAINT FORM (Internal Use)**

Date: \_\_\_\_\_

Complainant's Name: \_\_\_\_\_

Complainant's Position: \_\_\_\_\_

Respondent's Name: \_\_\_\_\_

Respondent's Position: \_\_\_\_\_

**Description of Harassment:**

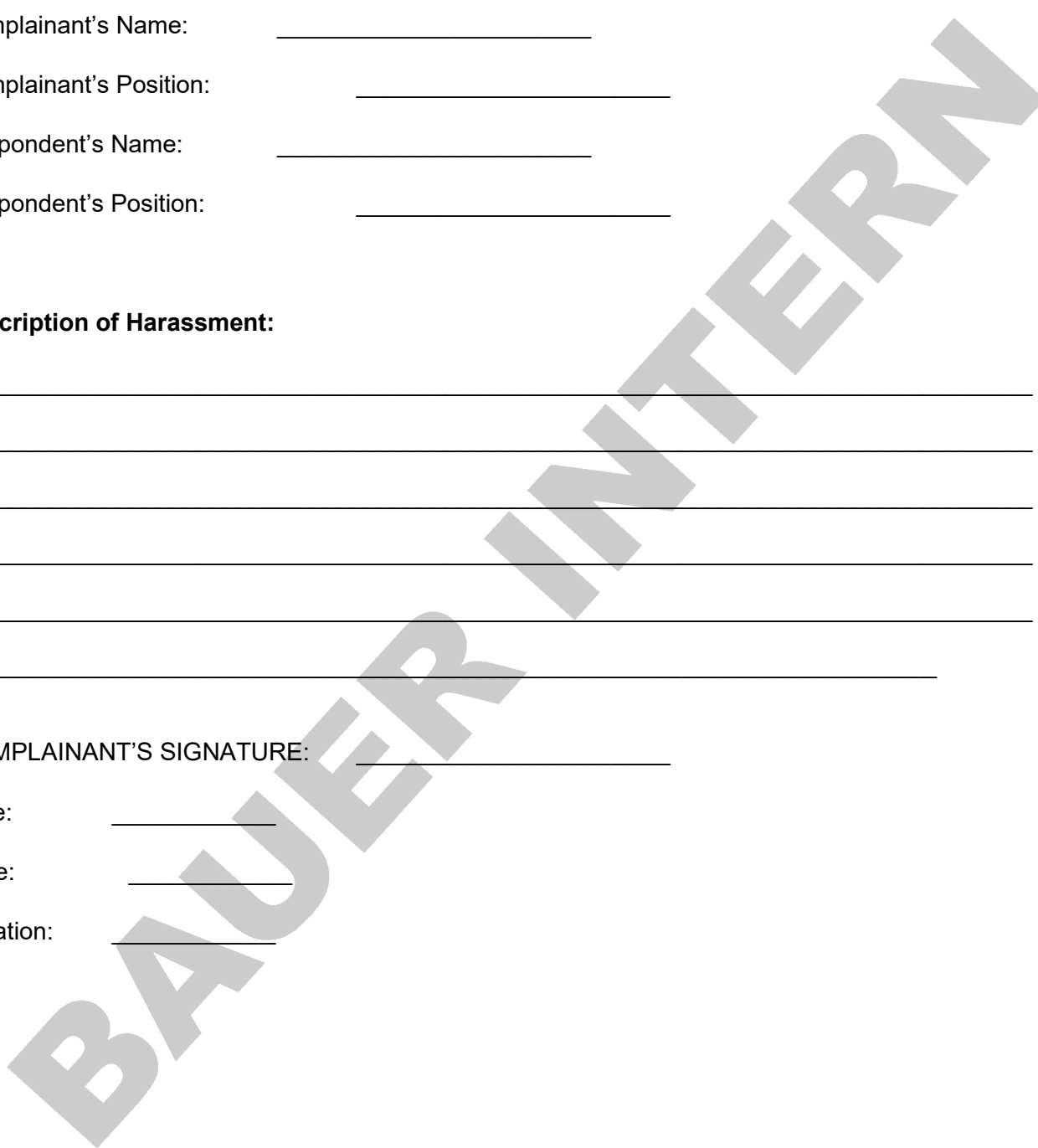
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

COMPLAINANT'S SIGNATURE: \_\_\_\_\_

Date: \_\_\_\_\_

Time: \_\_\_\_\_

Location: \_\_\_\_\_



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### COMPLAINT MECHANISM:

Apart from submitting a written complaint to any members of the IC in the complaint form on the earlier page, complaints can be filed via:

Email to:

Mrs. Swati Rane, Chairperson of the IC ([Swati.Rane@bauer.de](mailto:Swati.Rane@bauer.de)) AND/OR

Mr. Pratik Nawandar, Nodal Officer of SHe-Box Portal ([Pratik.Nawandar@bauer.de](mailto:Pratik.Nawandar@bauer.de))

Online Medium (SHe-Box Portal) : <https://shebox.wcd.gov.in/>

### INVESTIGATING THE COMPLAINT:

After the complainant brings the incident to the notice of the committee members, the complainant will be asked to submit details of the incident in writing. On submission of the same, the complainant will be called by the IC committee for a detailed investigation. The investigator should stress that questioning does not mean that the person complaining is not believed, but is intended to establish independently that a complaint has substance.

The person investigating the complaint should record the following information:

- the alleged offender's name and position or other means of identification;
- Whether the person who has complained works with the alleged offender or encounters him or her in the course of work. For example, is the alleged offender a co-worker or a customer;
- the time, date and location of each incident and the names of possible witnesses if any;
- the details of each alleged incident;
- Whether any written evidence is available. For example, journal notes, letters, e-mail or any other records. If yes, these should be submitted to the IC committee.
- the complainant should be questioned about inconsistent evidence and whether it can be explained;

At the end of the interview the complainant should also be asked to sign his or her statement.

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## THE RESPONDENT

The Chairperson/Member of the IC will meet with the Respondent named in the complaint. The Respondent will be advised that the purpose of the meeting is to discuss the harassment complaint and that the Respondent may have a witness attend the meeting. A copy of the written complaint form will be given to the Respondent during this meeting. The response will be documented as a statement by the Chairperson/Member of the IC who will permit the Respondent to read and sign the written account of the events from the Respondent's perspective. The written record will include any witnesses the Respondent thinks should be interviewed.

It may be that the Respondent has offended, humiliated or degraded the complainant without intending to. Where this is the case, the matter may be resolved at this stage with an apology and with a commitment by the Respondent to change the offending behavior. Where there is a case of sexual harassment, disciplinary action will be initiated at appropriate levels.

The complainant will be called by the committee for presentation of the case. Thereafter, respondent will be asked to submit his/her response. In case of difference in the statements, both the witnesses may be asked to give statements.

## STATEMENT & INVESTIGATION OF THE ALLEGED OFFENDER

The investigator should interview the alleged offender with the same respect and courtesy shown to the complainant. The person against whom a complaint has been made should be asked to give an account of what happened from his or her perspective. The person should be told that as much information as possible will be required to allow an impartial decision to be made. Also, the following information should be obtained:

- obtain the names of witnesses who can speak in the defense of the alleged offender;
- the alleged offender should be asked to describe in detail the working relationship with the complainant;
- allegations should be addressed in turn and detailed explanations or defenses documented. Any written records or documents should be obtained;
- ask for an explanation where inconsistent information is provided;
- the alleged offender should be advised that a full response is important and asked if there is any other information which might be helpful to the complaint;
- the alleged offender should be told that there will be an opportunity to comment on any additional information brought forward by the complainant;

## CALLING OF WITNESSES OF BOTH PARTIES

Witnesses to be examined of both parties and should not be given the details of a complaint but advised that you are investigating sexual harassment allegations and asked if they have any relevant information.

## RECOMMENDATIONS BY THE COMMITTEE

After investigating, the recommendations will be forwarded to the management for further decisions.