

# **PREVENTION OF SEXUAL HARASSMENT - POLICY**

|                | Name                  | Designation & Function  |             |  |
|----------------|-----------------------|-------------------------|-------------|--|
| Approved By    | Anushree Singh        | Associate Director - HR |             |  |
| Document No.   | EG-HR-P-005           |                         |             |  |
| Valid From     | 1st June 2016         |                         |             |  |
| Active version | 1st April 2023        |                         |             |  |
|                |                       |                         |             |  |
| Sr. No         | Description of Change | Date of Change          | Version No. |  |
| 1              | Updation of IC Member | 1-Apr-23                | 1.0         |  |
| 2              | Updation of IC Member | 1-Oct-23                | 2.0         |  |
|                |                       |                         |             |  |

#### FOUNDATION TO EDUCATE GIRLS GLOBALLY

**REGISTERED OFFICE:** 50/8, First Floor, Tolstoy Lane, Janpath, New Delhi, Delhi, 110001 India.

HEAD OFFICE: C103/C104 1st Floor, Remi Bizcourt, Shah Industrial Estate, Off Veera Desai Road, Andheri West, Mumbai 400053.

+91-22 48932226 • Website: www.educategirls.ngo • Email: info.in@educategirls.ngo

Registered under Section 8 of the Indian Companies Act, 2013 | CIN No. U80900DL2007NPL171093



### 1. Objective:

We are committed to providing a work culture at FEGG that is devoid of any harassment. This policy document provides guidelines for reporting sexual harassment against women at the workplace.

## 2. Applicability:

This policy is applicable to all part time, full time payroll employees of FEGG and any other person who as per their contractual agreement with Foundation to Educate Girls Globally is in a role that requires them to report sexual harassment.

The policy is applicable to all the associates of FEGG irrespective of position/grade, including Payroll employees, temporary employees, trainees and associates on contract at its workplace or at client/assignment sites or working on a voluntary basis.

It also applies to all the visitors & vendors/suppliers/contractors and their representatives associated with FEGG & visiting any premises of FEGG, or whose premises our associates visit for work related activities.

The workplace includes :

- All offices, schools, camps, centers or other premises where FEGG's programs are conducted
- All FEGG related activities/events/meetings performed at any other site away from FEGG's premises
- Any place visited by the employees arising out of or during the course of employment including any transportation provided by FEGG for undertaking the journey.

# 3. Definition :

According to THE SEXUAL HARASSMENT OF WOMEN AT THE WORKPLACE (PREVENTION, PROHIBITION AND REDRESSAL) ACT 2013, sexual harassment includes any one or more of the following unwelcome acts or behaviour (whether directly or by implication) namely:

- Physical contact and advances; or
- A demand or request for sexual favors; or
- Making sexually coloured remarks, lewd or sexually suggestive comments, jokes, innuendoes, or gestures; or
- Showing pornography; or
- Any other unwelcome physical, verbal or non-verbal conduct of sexual nature

While it is not easy to provide a complete list of the types of improper behaviour, to prevent sexual harassment at the workplace, the following circumstances, among other; if they occur or are



present in relation to or connected with any act or behaviour of sexual harassment may amount to sexual harassment:

- Quid pro quo sexual harassment
- Implied or explicit promise of preferential treatment in her employment; or
- Implied or explicit threat of detrimental treatment in her employment; or
- Implied or explicit threat about her present or future employment status; or
- Interference with her work or creating an intimidating or offensive or hostile work environment; or
- Humiliating treatment likely to affect her mental, physiological, emotional or physical health and safety.
- Observing, photographing, videotaping, or making other visual or auditory records of sexual activity or nudity, where there is a reasonable expectation of privacy, without the knowledge and consent of all parties; or
- Sharing visual or auditory records of sexual activity or nudity without the knowledge and consent of all recorded parties and recipient(s)
- Stalking

#### 4. Responsibilities regarding Prevention of Sexual Harassment:

All employees of Foundation to Educate Girls Globally have a personal responsibility to ensure that their behaviour is not contrary to this policy. All employees are encouraged to reinforce the maintenance of a work environment free from sexual harassment.

#### 5. Complaint mechanism and complaint committee

Constitution of Internal Complaints Committee will be as mentioned below:

One Presiding Officer, 2-3 Members of the Committee and one Member from amongst NGO or association committed to the cause of women or a person familiar with the issues of sexual harassment or women cause.

The quorum of three members are required for the proceedings to take place including the Presiding Officer.

At least one-half of the total members of the IC will be women

An appropriate complaint mechanism in the form of **Internal Committee (IC)** has been formulated at Foundation to Educate Girls Globally for time-bound redressal of the complaint made.

Below are the details of IC committee/s:



| Internal Committee Members   | Email ID             |  |
|--|----------------------|--|
| Common ID (includes 03 IC presiding officers & Executive Director) | icc@educategirls.ngo |  |

| IC - Mumbai                             |                                      |                 |  |  |
|---|--------------------------------------|-----------------|--|--|
| Name                                    | Email Id                             | Contact Number  |  |  |
| Krati Tolani – Presiding Officer        | krati.tolani@educategirls.ngo        | +91 98280 32884 |  |  |
| Shwetha Kamath                          | shwetha.kamath@educategirls.ngo      | +91 99721 70654 |  |  |
| Vikram Singh Solanki                    | vikram.solanki@educategirls.ngo      | +91 99294 42299 |  |  |
| Vishal Sabharwal                        | vishal.sabharwal@educategirls.ngo    | +91 98991 98903 |  |  |
| IC - Rajasthan                          |                                      |                 |  |  |
| Naina Joshi – Presiding Officer         | naina.joshi@educategirls.ngo         | +91 87698 69608 |  |  |
| Alka Singh                              | alka.singh@educategirls.ngo          | +91 70328 19138 |  |  |
| Abdur Rahman                            | abdur.rahman@educategirls.ngo        | +91 96652 71857 |  |  |
| Brajesh Kumar Sinha                     | brajeshkumar.sinha@educategirls.ngo  | +91 80033 96997 |  |  |
| IC - Madhya Pradesh & Uttar Pradesh     |                                      |                 |  |  |
| Vaijayanti Bagwe – Presiding<br>Officer | vaijayanti.bagwe@educategirls.ngo    | +91 99206 96230 |  |  |
| Shabnam Aziz                            | shabnam.aziz@educategirls.ngo        | +91 94140 16065 |  |  |
| Bhupendra Choudhary                     | bhupendra.choudhary@educategirls.ngo | +91 97995 54253 |  |  |



L

I

| Ranjeet Nath                          | ranjeet.nath@educategirls.ngo      | +91 98181 07912         |  |  |  |
|---------------------------------------|------------------------------------|-------------------------|--|--|--|
| IC - Uttar Pradesh                    |                                    |                         |  |  |  |
| Anushree Singh – Presiding<br>Officer | anushree.singh@educategirls.ngo    | + <b>91</b> 98197 81986 |  |  |  |
| Gopal Kumar Singh                     | gopalkumar.singh@educategirls.ngo  | + <b>91</b> 76178 36180 |  |  |  |
| Christine Roberts                     | christine.roberts@educategirls.ngo | + <b>91</b> 97696 91707 |  |  |  |
| Nitin Kumar Jha                       | nitinkumar.jha@educategirls.ngo    | + <b>91</b> 79743 33462 |  |  |  |

#### <u>Tenure:</u>

Т

The term of the members of the IC will be for 3 years. On the expiry of the term of the members, a new committee will be formulated. In case of any vacancy arising out due to any reason, management will immediately fill the vacancy by nominating another person in place.

Any change in the composition of the team within the 3 years period will be communicated separately.

The ICC is responsible for:

- Providing an internal mechanism for redressal in cases of sexual harassment
- Investigating every verbal or written complaint of sexual harassment

I.

- Taking prompt and appropriate action against anyone violating the Educate Girls policy for sexual harassment
- In accordance with Rules and Procedures laid down herein.
- Create awareness and discouraging and preventing employment-related sexual harassment
- Prepare and widely circulate in all its offices, the Educate Girls policy for sexual harassment

#### 6. Procedures for resolution, settlement or prosecution of acts of sexual harassment:

Educate Girls is committed to providing a supportive environment to resolve concerns of sexual harassment. The complainant can bring their concern to the attention of the ICC for redressal of their grievances **both verbally or giving a written complaint**. The IC will thereafter provide advice or extend support as requested and will undertake prompt investigation to resolve the matter. The



immediate action taken by the IC against the harasser will depend and vary from case to case depending on the severity of the case.

A complaint of sexual harassment shall be reported or filed by the complainant *within 90 days from the date of the incident*. This period may be extended in case of circumstances which prevented the complainant from filing the complaint within the stipulated time.

The Complaints Committee shall conduct such investigations in a timely manner and shall *complete the inquiry within a period of 90 days* from the date on which the inquiry is commenced.

#### **Disciplinary Action**

After completing the inquiry, the Internal Committee will submit its report with recommendations of the punishment or penalty to be imposed on the respondent if the charges are proved.

The punishment may include issuance of warning, transfer, withholding promotion/increments, suspension or termination of the respondent and/or payment of compensation.

All such actions will be taken within 30 days of receipt of report from the Internal Complaint Committee.

All such actions will be taken within **60 days** of receipt of report from the Internal Complaint Committee.

#### Complaints made with a false or malicious intent

The complaint of sexual harassment made by any complainant shall be taken up with utmost seriousness by FEGG. However, there shall be zero tolerance for any false accusation.

In case, the Internal Committee arrives at conclusion that the complaint of the complainant is unjustified, false, malicious or had raised the concern with ulterior motives or complainant knowing it to be false, produced forged or misleading documents, the Internal Committee may recommend the management to take action against the complainant which may be subject to disciplinary action, up to and including termination.