



## **PREVENTION OF SEXUAL HARASSMENT POLICY**

	<b>Name</b>	<b>Designation &amp; Function</b>	
<b>Approved By</b>	Anushree Singh	Associate Director - HR	
<b>Document No.</b>	EG-HR-P-005		
<b>Valid From</b>	1st June 2016		
<b>Active version</b>	1.4		
<b>Sr. No</b>	<b>Description of Change</b>	<b>Date of Change</b>	<b>Version No.</b>
1	IC Members Updated	1-Apr-23	1.1
2	IC Members Updated	1-Jun-24	1.2
3	IC Members Updated	15-Jan-25	1.3
4	IC Information Updated	1-Feb-26	1.4

### **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](http://www.educategirls.ngo) • Email: [info.in@educategirls.ngo](mailto:info.in@educategirls.ngo)

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

### **1. Objective:**

This policy is based on the 'THE SEXUAL HARASSMENT OF WOMEN AT THE WORKPLACE (PREVENTION, PROHIBITION AND REDRESSAL) ACT 2013'.

Foundation to Educate Girls Globally (FEGG) is committed to providing a safe work environment and a culture that is devoid of any harassment.

This policy document provides guidelines for reporting sexual harassment against women at the workplace and the details of the internal procedures.

### **2. Applicability:**

This policy is applicable to all part time, full time 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 behavior 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:

<b>Internal Committee Members</b>	<b>Email ID</b>
Common ID (includes IC presiding officers)	icc@educategirls.ngo

<b>IC - Bihar</b>	
<b>Geetika Higgins - Presiding Officer</b>	geetika.higgins@educategirls.ngo
<b>Nandita Karan Suchak</b>	nandita.suchak@educategirls.ngo
<b>Bhupendra Choudhary</b>	bhupendra.choudhary@educategirls.ngo
<b>Gopal Kumar Singh</b>	gopalkumar.singh@educategirls.ngo

<b>IC - Madhya Pradesh</b>	
<b>Vaijayanti Bagwe – Presiding Officer</b>	vaijayanti.bagwe@educategirls.ngo
<b>Alka Singh</b>	alka.singh@educategirls.ngo
<b>Mohit Pathak</b>	mohit.pathak@educategirls.ngo
<b>Ranjeet Nath</b>	ranjeet.nath@educategirls.ngo

<b>IC - Maharashtra (+Any other State where IC is not defined)</b>	
<b>Krati Tolani – Presiding Officer</b>	krati.tolani@educategirls.ngo
<b>Vanita Balakrishna Kariappa</b>	vanita.kariappa@educategirls.ngo
<b>Vikram Singh Solanki</b>	vikram.solanki@educategirls.ngo
<b>Bineesh E M</b>	bineesh.mathai@educategirls.ngo

<b>IC - Rajasthan</b>	
<b>Shivla Saksena – Presiding Officer</b>	shivla.saksena@educategirls.ngo
<b>Ashwini Rahul Maslekar</b>	ashwini.maslekar@educategirls.ngo
<b>Abdur Rahman</b>	abdur.rahman@educategirls.ngo
<b>Brajesh Kumar Sinha</b>	brajeshkumar.sinha@educategirls.ngo

<b>IC - Uttar Pradesh</b>	
<b>Anushree Singh – Presiding Officer</b>	anushree.singh@educategirls.ngo
<b>Christine Roberts</b>	christine.roberts@educategirls.ngo
<b>Akhil Agrawal</b>	akhil.agrawal@educategirls.ngo
<b>Nitin Kumar Jha</b>	nitinkumar.jha@educategirls.ngo

### **Tenure:**

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.

If any members are unavailable for an investigation, they may be replaced by any other IC-trained member with the approval of Head HR or CEO

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
- 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:**

FEGG 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 act against the complainant which may be subject to disciplinary action, up to and including termination.