



HR POLICY ON SEXUAL HARASSMENT

Our company is committed to creating an ambience in which all employees can work together free from sexual harassment. The policy lays down the rules and the procedure to deal with any incidents of such nature.

POLICY TO PREVENT AND DEAL WITH SEXUAL HARASSMENT IN TLC RELATIONSHIP MANAGEMENT PVT LTD / GTM AND OTHER GROUP COMPANIES (TLC GROUP)

TLC GROUP., (hereinafter “The Company”) is committed to creating an ambience in which all employees can work together free from sexual harassment. The Company believes that all employees, including other persons who have dealings with the Company have the right to be treated with dignity. Sexual harassment is an offence and is therefore, punishable.

1. SHORT TITLE, EXTENT AND COMMENCEMENT

This Policy will be called the Policy on Sexual Harassment in TLC GROUP of companies and extends to all Employees of the Company. This policy will come into effect from 01/01/2004 and is deemed to be incorporated in the service conditions of all employee and agents.

2. DEFINITIONS

"Sexual Harassment" includes any unwelcome, sexually determined behavior, direct or by implication, and includes any physical contact and advances, a demand or request for sexual favors, sexually colored remarks, unsavory remarks, showing pornography, any other unwelcome physical (for example, touching or brushing against any part of the body and the like, etc.), verbal or non verbal conduct having sexual overtones.

Explanation: For the purposes of this policy "Sexual Harassment" shall include, but will not be confined to the following:

- i. Unwelcome sexual advances, requests for sexual favors, and / or verbal or physical conduct of a sexual nature made, either explicitly or implicitly, in return for a term or condition of instruction, employment, participation or evaluation of a person's engagement in any company activity.
- ii. When unwelcome sexual advances and/ or verbal, non-verbal, or physical conduct such as loaded comments, remarks or jokes, letters, phone calls or through e- mail, gestures, showing of pornography, lurid stares, physical contact or molestation, staking, sounds or display of a derogatory nature have the purpose or effect of interfering with an individual's performance or of creating an intimidating, hostile or offensive environment;
- iii. Forcible physical touch or molestation.



- iv. Eve teasing, innuendos and taunts, physical confinement against one's will and any other act likely to impinge upon one's privacy.
- v. Any act or conduct by a person in authority and belonging to one sex which denies or would deny equal opportunity in pursuit of career development or otherwise making the environment at the workplace hostile or intimidating to a person belonging to the other / same sex.
- vi. When any such conduct is committed by a third party or outsider in relation to an Employee of TLC GROUP, or vice versa during the course of employment.
 - a. "Employee" means any person on the rolls of the Company to whom this policy is applicable including temporary, part time, agent, honorary, employee by whatever name called and would include employees engaged on a casual or project basis and also engaged through a contractor.

3. SCOPE OF THE POLICY

- a. This Policy will be applicable to all allegations of Sexual Harassment made by an Employee / third party or against an Employee / third party, irrespective of whether Sexual Harassment is alleged to have taken place within or outside the Company premises.

4. COMPLAINTS COMMITTEE

A Panel has been appointed by the Chairman & Managing Director to consider any Complaints of Sexual Harassment and deal with all cases of alleged Sexual Harassment and otherwise implement this policy. For any case, a Complaints Committee consisting of 3 members has been constituted to deal with the case. The three members who form a part of the panel are:

Name	Cell No	Email
Geetika Sharma Sethi (External Member)	9810222118	
Alka Ratanpal (Member)	9820463336	alka@tlcgroup.com
Roopal Krishnani (Member)	9867980859	roopal@tlcgroup.com
Poonam Sareen (Co-ordinator)	99596 33330	poonam@tlcgroup.com



5. GRIEVANCE PROCEDURE

- a. Any Employee (“Complainant”) may lodge a complaint of Sexual Harassment (“Complaint”) against an Employee / third party (“Accused”) or vice versa, with the any of the members of the Panel at the earliest point of time and in any case preferably within 30 days from the date of occurrence of the alleged incident. If the Complainant feels that she / he cannot disclose her/his identity for any particular reason with the Panel members, she/he can address the complaint to the Chairman & Managing Director.
- b. Such a Complaint may be oral or in writing.
- c. If the Complaint is oral, the same shall be put in writing by the Complainant and shall be signed on every page, at the foot of the page, by the Complainant.
- d. The Complaints Committee will hold a meeting with the Complainant latest within a period of 30 (thirty) days within the receipt of the complaint and advance intimation will be given to the Complainant of the same.
- e. At the first meeting of the Complaints Committee, the Complainant shall be heard and her/ his statement recorded (Statement of Allegation).The Complainant can produce corroborative material with a documentary oral material, etc., to substantiate his / her complaint.
- f. Thereafter, the Accused will be called to a meeting by the Complaints Committee and will be informed of the Complaint and an opportunity will be given to the Accused to give an explanation, where after, an “Enquiry” shall be conducted.
- g. In the event the complaint does not fall under the purview of Sexual Harassment / the Complaint on the face of it does not disclose an offence of Sexual Harassment, the Complaints Committee may drop the complaint after recording the reason/s thereof.
- h. In case the complaint registered by the complainant is found to be false at any stage, the complainant shall be liable for appropriate action as per the service rules of the company.

6. PROCEDURE FOR ENQUIRY

The Complaint’s Committee shall immediately proceed with the Enquiry and communicate the same to the Complainant and the Accused. The Complaints Committee shall record all the proceedings of the Enquiry and all parties present at any of the communication meetings, shall endorse the same in token of authenticity thereof. The Complaints Committee shall hand over the Statement of Allegation to the Accused and give an opportunity to the Accused to submit a written explanation if she / he so desires within 15 days of receipt of the same.

- a. The Complainant will be provided with a copy of the written explanation submitted by the Accused.



- b. If the Complainant or the Accused desire any witness/es to be called, they shall communicate in writing to the Complaints Committee the names of witness/es that they propose to be called.
- c. If the Complainant desires to tender any documents by way of evidence before the Complaints Committee, she / he shall supply true copies of such documents to the Complaints Committee. Similarly, if the Accused desires to tender any documents in evidence before the Complaints Committee he / she shall supply true copies of such documents to the Complaints Committee and will affix his / her signature on the same to certify it to be a true copy.
- d. The Committee will call upon all witnesses mentioned by both the parties.
- e. The Complaint's Committee will provide every reasonable opportunity to the Complainant and to the Accused, for putting forward and defending their respective case.
- f. The Complaints Committee shall complete the "Enquiry" as soon as is reasonably possible and communicate its findings and its recommendations for disciplinary action to the Appointing Authority.
- g. The Chairman & Managing Director will direct the Organization to take action in accordance with the recommendations proposed by the Complaints Committee.
- h. The Complaints Committee shall be governed by such rules as may be framed by Company from time to time, taking into account the best practices from India and Abroad.

7. PROTECTION AGAINST VICTIMIZATION

The victim of Sexual Harassment has the option to seek transfer of the perpetrator of his / her own transfer.

8. OBLIGATION OF THE MANAGEMENT

The Management of the COMPANY shall provide all necessary assistance for the purpose of ensuring full, effective and speedy implementation of this policy.

9. THIRD PARTY HARASSMENT

Where sexual harassment occurs as a result of an act or omission by any third party or outsider, the COMPANY shall take all steps necessary and reasonable to assist the affected person in terms of support and preventive action.

10. ANNUAL REPORT

The Complaints Committee shall prepare an Annual report at the end of the financial year of the Company, giving a full account of its activities during the previous year and forward a copy thereof, to the Chairman & Managing Director who shall forward the same to the Ministry of HRD if necessary.