



**POLICY ON PREVENTION OF SEXUAL HARASSMENT OF
WOMEN AT WORKPLACE**

**[As per Provisions of The Sexual Harassment of Women at Workplace
(Prevention, Prohibition and Redressal) Act, 2013]**

THE POLICY STATEMENT

LIGHTHOUSE COMMUNITIES FOUNDATION (“The Company”) is committed to providing a safe environment for all its employees free from discrimination on any ground and from harassment at work including sexual harassment.

The Company will operate a zero-tolerance policy for any form of sexual harassment in the workplace, treat all incidents seriously and promptly investigate all allegations of sexual harassment. Any person found to have sexually harassed another will face disciplinary action, up to and including dismissal from employment.

All complaints of sexual harassment will be taken seriously and treated with respect and in confidence. No one will be victimized for making such a complaint.

In light of the above, the Company has formulated Policy on Prevention of Sexual Harassment of Women at workplace.

DEFINITIONS

- 1. Sexual harassment** may occur not only where a person uses sexual behavior to control, influence or affect the career, salary or job of another person, but also between co-workers. It may also occur between a LCF employee and someone that employee deals with in the course of his/her work who is not employed by LCF.

“Sexual Harassment” includes any one or more of the following unwelcome acts or behavior (whether directly or by implication):

- a) Any unwelcome sexually determined behavior, or pattern of conduct, that would cause discomfort and/or humiliate a person at whom the behavior or conduct was directed namely:
 - i. Physical contact and advances;
 - ii. Demand or request for sexual favors;
 - iii. Sexually colored remarks or remarks of a sexual nature about a person's clothing or body;
 - iv. Showing pornography, making or posting sexual pranks, sexual teasing, sexual jokes, sexually demeaning or offensive pictures, cartoons or other materials through email, SMS, MMS etc.;
 - v. Repeatedly asking to socialize during off-duty hours or continued expressions of sexual interest against a person's wishes;
 - vi. Giving gifts or leaving objects that are sexually suggestive;
 - vii. Eve teasing, innuendos and taunts, physical confinement against one's will or any such act likely to intrude upon one's privacy;
 - viii. Persistent watching, following, contacting of a person; and
 - ix. Any other unwelcome physical, verbal or non-verbal conduct of sexual nature.
- b) The following circumstances if it occurs or is present in relation to any sexually determined act or behavior amount to sexual harassment:
 - Implied or explicit promise of preferential treatment in employment;
 - Implied or explicit threat of detrimental treatment in employment;
 - Implied or explicit threat about the present or future employment status;
 - Interference with the person's work or creating an intimidating or offensive or hostile work environment; or
 - Humiliating treatment likely to affect her health or safety.

The reasonable person standard is used to determine whether or not the conduct was offensive and what

a reasonable person would have done. Further, it is important to note that whether harassment has occurred or not, does not depend on the intention of the people but on the experience of the aggrieved person.

2. **Aggrieved Person:** In relation to a workplace, a person, of any age, whether employed or not, who alleges to have been subjected to any act of sexual harassment by the respondent and includes contractual, temporary, visitors.

Word and expression used in this policy but not defined herein shall have the same meaning prescribed to them in The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and the Rules framed there under, as amended from time to time.

INTERNAL COMMITTEE:

The Company at this moment constitutes an Internal Complaints Committee (from now on referred to as 'Committee') as required under Section 4 of the Act. The Committee has been established to ensure that any incidence of sexual harassment is dealt with appropriately, sensitively and expeditiously;

- **Internal Complaints Committee for Sexual Harassment comprises of**
 - Presiding Officer: A woman employed at a senior level in the organization or workplace
 - At least 2 members from amongst employees, committed to the cause of women and or having the legal knowledge
 - One external member, familiar with the issues relating to sexual harassment
 - At least one-half of the total members is women
- **The committee is responsible for:**
 - Receiving complaints of sexual harassment at the workplace
 - Initiating and conducting an inquiry as per the established procedure
 - Submitting findings and recommendations of inquiries
 - Coordinating with the employer in implementing appropriate action
 - Maintaining strict confidentiality throughout the process as per established guidelines
 - Submitting annual reports in the prescribed format

PROCESS FOR DEALING WITH INCIDENTS OF SEXUAL HARASSMENT:

- i. Any employee who experiences sexual harassment may make a complaint reporting the incidence of Sexual Harassment in writing to the Committee. In case the employee is unable to report the said incident in writing, the committee member shall render all the necessary resources & support to the aggrieved employee to make the complaint in writing. The Contents of the said complaint should narrate the incident of Sexual Harassment and should also contain the name and details of the accused employee.
- ii. The aggrieved employee shall report the said incident within a period of three months from the date of the last incident.
- iii. The Committee may before initiate an inquiry and at the request of the aggrieved person take steps to settle the matter between her and the accused, provided that the settlement shall be in form of conciliation and not monetary settlement. On arriving at a settlement, the settlement shall be formally recorded and shall be forwarded to the employer, the parties to the conciliation and the

Committee.

- iv. On failing conciliation, the Committee will immediately arrange to fully investigate all relevant details of the matter. It will do so with all possible care, sensitivity and discretion in protecting the sensibilities of the affected employee. The employee or employees, who have allegedly committed the offense, would be given all reasonable opportunity to be heard by the Committee.
- v. The result of this investigation will be formally recorded and communicated to the Director, along with a recommendation for appropriate action.
- vi. The Committee will normally complete this process and make its first formal recommendation within 15 days after receiving the complaint unless there are exceptional circumstances.
- vii. In the case of a multi-location context, one of the committee members may travel to the location in question as is required to ascertain the facts based on which the committee would discuss and assess the complaint in question.
- viii. Necessary action will then be taken with regard to the offending employee or employees based on the circumstances and seriousness of the offense.
- ix. Where the Company is legally advised that any such incident constitutes a criminal offense, the Company will inform the relevant authority, provide full details and request appropriate action. If the aggrieved employee directly takes any action, against the offending employee, either civil or criminal, the Committee, on becoming aware of such action by the aggrieved employee, shall be entitled to, suo moto, start the internal inquiry/ investigation and recommend appropriate action.
- x. The Company will ensure that the career interests of the complainant are not adversely affected by the individual having drawn attention to such an offense. In order to ensure that this important matter is not trivialized, any complaint, which, in the opinion of the Committee, is blatantly false or frivolous or has been motivated by, reasons that are clearly unconnected with gender issues, would be viewed very seriously by the Company and an appropriate action shall be taken against such complainants.
- xi. If the Committee receives an anonymous reference related to sexual harassment, it will draw the attention of the senior executives concerned with the relevant business or location. The matter will be fully examined by the concerned senior management and its conclusions and plans for necessary action will be communicated to the Committee.
- xii. Heads of departments and Senior Managers at all locations will also be expected to be sensitive to any circumstances or behavior among their colleagues which appear to go against the Company's policy on this matter. In case they become aware of any such incidence, they will immediately inform the head of the Committee and take appropriate action as advised.
