

PREVENTION OF SEXUAL HARASSMENT POLICY

Under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013

Effective from December 9, 2013

INTRODUCTION:

This policy is framed in accordance with "The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013." It aims to prevent and address sexual harassment in the workplace. The success of any organization is based on treating everyone with respect and dignity, providing equal opportunities for development, and protecting privacy.

DEFINITION OF SEXUAL HARASSMENT:

Sexual harassment includes unwelcome behaviors such as:

- Physical contact, demands for sexual favors, or sexually suggestive remarks
- Displaying offensive material, sexually explicit jokes or comments
- Repeated unsolicited socializing requests or gifts
- Inappropriate comments on a person's appearance, or behavior intruding on privacy
- Persistent unwanted communication via digital platforms outside work hours

Sexual harassment is not limited by intention but by the experience of the affected person.

ROLES AND RESPONSIBILITIES:

1. **Individuals:** Employees must respect others' rights and report unwelcome behavior.
2. **Managers:** Ensure equal treatment and a harassment-free environment.
3. **Employers (Management):** Responsible for creating a safe work environment, forming an Internal Committee (IC), and ensuring employees are aware of the policy.

REDRESSAL MECHANISM:

- **Internal Committee (IC):** The IC is responsible for receiving and addressing complaints, conducting inquiries, and making recommendations.
- **Lodging a Complaint:** Complaints must be submitted in writing within 3 months of the incident, with a possible extension for valid reasons. The complaint may be filed by someone on behalf of the aggrieved woman with her consent.
- **Complaint Handling:** Complaints are handled confidentially, and the complainant can bring support during meetings.

RESOLUTION PROCEDURES:

1. **Conciliation:** If requested, the IC will attempt to resolve the matter through conciliation within two weeks.

2. **Formal Inquiry:** If conciliation fails or is not requested, an inquiry will be initiated within one week, ensuring fairness and natural justice. The inquiry will be completed within 90 days.
3. **Interim Relief:** The IC may recommend temporary measures, such as leave or transferring the parties to prevent further interaction.

ACTIONS AFTER INQUIRY:

- If the complaint is substantiated, the management may take actions such as counseling, reprimand, suspension, or termination.
- If the complaint is unsubstantiated, no action will be taken against the respondent.

MALICIOUS COMPLAINTS:

If a complaint is found to be malicious, action may be taken against the complainant, similar to actions for substantiated complaints.

CONFIDENTIALITY:

All information related to the complaint, inquiry, and action taken is confidential. Violation of confidentiality will lead to disciplinary action.

APPEAL:

Any party dissatisfied with the outcome may appeal to the appellate authority within 90 days.

IMPORTANT NOTE:

Though the policy is designed to address sexual harassment of women, CINEFIL extends the policy to male employees as well, providing them the opportunity to file complaints under the same procedures.