



Glottis

Glottis Limited

Policy on Prevention of Sexual Harassment at Workplace

CIN: U63090TN2022PLC151443

Registered Office: New No.46, Old No.311, 1st Floor, Thambu Chetty Street, Chennai, Tamil
Nadu, India, 600001

POLICY ON PREVENTION OF SEXUAL HARASSMENT AT WORKPLACE

A. Commitment

Glottis Limited (Herein after known as “**The Company**”), is committed to create a work environment that ensures every employee is treated with dignity and respect and afforded equitable treatment and an atmosphere free from any sexual harassment, exploitation and intimidation.

The Company is also committed to promoting a work environment that is conducive to the professional growth of its employees and encourages equality of opportunity.

The Company will not tolerate any form of sexual harassment and is committed to take all necessary steps to ensure that its employees are not subjected to any form of harassment on the basis of their gender.

B. Scope

This policy applies to all categories of employees of the Company, including permanent employees, temporary employees, trainees and employees on contract at their workplace or at client sites and any person responsible for the management, supervision and control of the workplace. The Company will not tolerate sexual harassment, if engaged in, by any employee or co-worker of the Company, its clients or by suppliers or any other business associates.

C. Definition:

- a. “Aggrieved Woman” means-
 - (i) in relation to a workplace, a woman, of any age whether employed or not, who alleges to have been subjected to any act of sexual harassment by the respondent;
 - (ii) in relation to dwelling place or house, a woman of any age who is employed in such a dwelling place or house;
- b. “Act” means: Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013.
- c. “The Company” means “Glottis Limited”.
- d. “Employee” means a person employed at a workplace for any work on regular, temporary, ad hoc or daily wage basis, either directly or through an agent, including a contractor, with or, without the knowledge of the principal employer, whether for remuneration or not, or working on a voluntary basis or otherwise, whether the terms of employment are express or implied and includes a co-worker, a contract worker, probationer, trainee, apprentice or called by any other such name;
- e. “Employer” means Chairman and/or Managing Director of the Company or any other Officer declared as such in its service rules.
- f. “Internal Committee” means an Internal Complaints Committee constituted under section 4;
- g. “Member” means a Member of the Internal Committee;

- h. “Presiding Officer” means the Presiding Officer of the Internal Complaints Committee nominated under sub-section (2) of section 4;
- i. “respondent” means a person against whom the aggrieved woman has made a complaint under section 9;
- j. “sexual harassment” includes any one or more of the following unwelcome acts or behavior (whether directly or by implication) namely:—
 - ❖ physical contact and advances; or
 - ❖ a demand or request for sexual favours; or
 - ❖ making sexually coloured remarks; or
 - ❖ showing pornography; or
 - ❖ any other unwelcome physical, verbal or non-verbal conduct of sexual nature;

In additions to above listed, the following acts and/or circumstances, among other circumstances, if it occurs or is present in relation to or connected with any act or behavior of sexual harassment may amount to sexual harassment:

- ❖ implied or explicit promise of preferential treatment in the employment;
 - ❖ Implied or explicit threat of detrimental treatment in the behavior;
 - ❖ Implied or explicit threat about their present or future employment status;
 - ❖ Interfering with their work or intimidating or offensive or hostile work environment; humiliation treatment likely to affect their health or safety.
 - ❖ humiliating treatment likely to affect the health and safety of the aggrieved person.
 - ❖ any other acts or behaviors any reasonable person views as such.
- k. “Workplace”: In addition to the place of work all other offices and premises such as Head office / Branch offices, regional offices, Stores, warehouses or other premises where the Company’s business is conducted and any place visited by the employee arising out of or during employment including transportation provided by the Company for undertaking such a journey. It shall also include any place where the aggrieved woman or the respondent visits in connection with his/her work/meeting, during and/or arising out of employment/ contract/ engagement with the Company, including transportation provided for undertaking such a journey.

Words and expressions used and not defined in this policy shall have same meaning as assigned to them by the **Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013** and any rules made thereunder, and any amendments made thereto.

D. INTERNAL COMPLAINTS COMMITTEE(ICC)

- 1. To inquire and advice suitable action on the complaints on Sexual Harassment, there shall be a Committee called as “Internal Complaints Committee (ICC)”. The Committee shall be constituted by Chairman and Managing Director with the following members:

- (a) A Presiding Officer, who shall be a woman employed at a senior level at workplace from amongst the employees. In case of non-availability of senior level woman employee, the Presiding Officer shall be nominated from administrative units of the workplace.
- (b) Not less than two (2) Members from amongst employees of the Company preferably committed to the cause of women or who have had experience in social work or have legal knowledge:
- (c) One member from amongst non-governmental organisations or associations committed to the cause of women or a person familiar with the issues relating to sexual harassment.

Provided that at least one-half of the total Members so nominated shall be women.

2. The Committee shall be responsible for below:
 - ❖ Receiving complaints of sexual harassment at the workplace
 - ❖ Initiating and conducting 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
3. Every complaint received shall be forwarded to the ICC for investigation, inquiry.
4. The committee members on need basis will be provided with necessary training to handle such matters effectively and with the required sensitivity and concern.

E. COMPLAINT REDRESSAL MECHANISM

1. Any aggrieved person may make, in writing in physical mode or through a Mail to **compliance@glottislogistics.in**, a complaint of sexual harassment at workplace to ICC within a period of three months from the date of incident and in case of a series of incidents, within a period of three months from the date of last incident, which may further be extended for a period not exceeding three months by ICC by recording the reasons in writing, if circumstances were such which prevented the aggrieved from filing a complaint within the said period.

Provided that where such complaint cannot be made in writing, the aggrieved women may request physically or through phone (**Phone Number: 96000 65937**) the Presiding Officer or any Member of ICC shall render all reasonable assistance to the aggrieved for making a complaint in writing.

2. Where the aggrieved employee is unable to make a complaint on account of their physical or mental incapacity or death or otherwise, (a) legal heir or friend; or (b) coworker; or (c) an officer of the

National Commission for Women or State Women's Commission; or (d) any person who has knowledge of the incident, with a written consent of the aggrieved women; may make a complaint.

3. The aggrieved employee or person authorized on their behalf as per above provision, shall make a complaint to the ICC along with supporting documents and names and address of witnesses. On receipt of such complaint, ICC shall provide a copy of such complaint along with supporting documents to the Respondent within 10 working days.
4. Respondent shall file reply to the complaint along with their list of documents, and names and addresses of witnesses, within a period not exceeding 7 (Seven) working days from the date of receipt of the documents from ICC.
5. ICC shall investigate the complaint in detail by giving reasonable opportunities for both the parties. For the purpose of making an inquiry, under this policy, ICC have the power of a civil court, vested in it, in respect of:
 - ❖ Summoning and enforcing the attendance of any person and examining him under oath;
 - ❖ Requiring discovery and production of documents;
 - ❖ Any other prescribed matter.
 - ❖ The inquiry shall be completed within a period of ninety days.
6. During the enquiry process, the Complainant and the Respondent shall refrain from any form of threat, intimidation or influencing of Witnesses.
7. The Committee shall ensure confidentiality during the enquiry process and will ensure that sufficient care is taken to avoid any retaliation against the witnesses.
8. ICC shall have the right to terminate the enquiry or give ex-parte decision on the complaint, if the Respondent or complainant remains absent for 3 consecutive hearings, without sufficient cause, provided that such termination or ex-parte order may not be passed without giving a notice in writing, 15 days in advance, to the party concerned.
9. The parties shall not be allowed to bring any legal practitioner to represent them in their case at any stage of the proceedings before the Internal Complaints Committee.
10. For conducting the enquiry, the quorum of the ICC shall be of 3 members including the presiding officer.
11. The ICC may before initiate an enquiry, and at the aggrieved party's request, attempt to settle the matter between them through conciliation. However, it shall ensure that:
 - ❖ No monetary settlement made as a basis of conciliation.

- ❖ Where a settlement has been arrived, the ICC record the settlement so arrived and forward the same to the employer to take action as specified in the recommendation. A copy of the same shall be provided to the aggrieved and the respondent.

Where, a settlement is arrived as mentioned hereinabove, no further enquiry shall be conducted by the ICC.

12. During such enquiry, upon written request by the aggrieved person, the committee may at its discretion recommend:

- ❖ To transfer the aggrieved person or the respondent to any other workplace
- ❖ Grant leave to the aggrieved person, up to three months with salary which is in addition to leave to which he/she is otherwise entitled.

Provided, the aggrieved person has to tender justified reason for such transfer or leave, such as threat to work in the work place.

F. RESPONSIBILITIES OF ICC ON RECEIPT OF COMPLAINT

1. The committee shall on completion of the enquiry provide a report of its findings within 10 days from the date of completion of the enquiry and such report shall be made available to both Aggrieved and Respondent.
2. If the allegation against the Respondent has not been proved, the Committee may recommend not to take any action in the matter.
3. If the ICC arrives at the conclusion that the allegation against the Respondent has been proved, it shall recommend to the Employer to consider sexual harassment as a misconduct and take action in accordance with the provisions of the Service Rules of the Company.
4. Such action shall be taken within 60 days of receipt of report.

G. FALSE ALLEGATIONS:

1. The complaint of sexual harassment made by any employee shall be taken up with utmost seriousness by Company. However, there shall be zero tolerance for any false accusation.
2. On inquiry, if the ICC comes to a conclusion that the allegation was made with malicious intent or the aggrieved person or any other person making the complaint on behalf of the aggrieved person produced false or forged or misleading documents to prove his/her case, the ICC may recommend to take action against the person who made the complaint as per prescribed rules. In such a case,

malicious intent has to be established after an enquiry in accordance with the procedure prescribed, before any action is recommended. A mere inability to substantiate a complaint or provide adequate proof would not attract action as provided herein. A similar recommendation for taking action would be recommended against any witness whom the ICC concludes, that he/she has given false evidence or produced forged or misleading documents.

3. The above provision is not to discourage employees from coming forward with complaints. Glottis Limited recognizes and expects certain claims may be difficult to prove or support, or may not in fact be found to raise to the level of seriousness deemed necessary to conclude as Sexual Harassment. Complaints falls under the above, shall not be considered to be false accusations.

H. AWARENESS:

1. All the women Employees, Agents, Customers, Vendors, Partners and Visitors shall have access to this Policy.
2. An awareness program shall be conducted among the women employees on the Policy & formation of ICC.
3. The Company shall comply with all other details as set out under Section 19 of the Act to ensure that all employees are provided with the safe working environment at work place.
4. Company shall display the notice showing the name of the ICC members suitably.
5. Company shall make a declaration regarding the Policy on sexual harassment every year in the annual report.

I. MISCELLANEOUS

1. Company with the approval of Competent Authority may make any alteration or amendment or rescind any of the clauses of this Policy as and when it finds it necessary to do so as long as it complies the Act.
2. Any such alterations or amendment or rescinding will be intimated to the employees.
3. Nothing contained in these Policy shall operate in derogation of any law for the time being in force or to the prejudice of any right of any employee under any other Rules or Law.
4. The ICC shall prepare an annual report with the following details and shall submit the same to the Management to include in its annual report:
 - ❖ Number of Complaints of sexual harassment received during the year;

- ❖ Number of complaints disposed of during the year;
 - ❖ Number of cases pending for more than 90 days;
 - ❖ Number of workshops or awareness program against sexual harassment carried out;
 - ❖ Nature of action taken by the employer.
5. The above Annual Report and the MIS should be prepared by the ICC and shall be submitted before the end of each financial year to the Senior Management of the Company.
 6. Any compliance requirements not explicitly mentioned in this policy will be carried out in accordance with the provisions outlined in the Prevention of Sexual Harassment (POSH) Act of 2013. The Service Provider acknowledges the importance of adhering to the guidelines set forth by the POSH Act, ensuring a safe and respectful work environment for all employees. This includes taking necessary measures to prevent, address, and resolve any incidents of sexual harassment in the workplace, as well as cooperating with any investigations or actions mandated by the Act. Compliance with the POSH Act will be treated with the same level of priority as other statutory obligations under this policy.

J. CONFIDENTIALITY

1. Complaints relating to Sexual Harassment shall be handled and investigations will be conducted under the principles of natural justice, basis of fundamental fairness, in an impartial and confidential manner so as to protect the identity of all viz. the person filing the charge, potential witnesses, and the person accused of improper behavior. Also, all efforts shall be taken to ensure objectivity and thoroughness throughout the process of investigation.
2. The identity and address of the aggrieved person, respondent and witnesses must not be published or disclosed to the public or media.
3. The decision of the Company shall be final and binding on all. However, the same is without prejudice to any recourse that Company or the individual concerned may have against the respondent and it shall not limit or restrict the rights of the Complainant and/or Company to pursue, nor shall they be precluded from pursuing, such further and other legal actions as may be available.

K. RESPONSIBILITIES OF THE MANAGEMENT

The management shall treat sexual harassment as a gross and unacceptable misconduct under the disciplinary policy and act for such misconduct.

The management shall undertake necessary awareness program and preventive measures against sexual harassment of women at workplace. These would include:

1. provide a safe working environment at the workplace with shall include safety from the persons coming into contact at the workplace;
2. Display at any conspicuous place in the workplace a copy of this policy
3. Organize periodical workshops and awareness programs at regular intervals for sensitizing the employees as required under the provisions of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and any other relevant awareness and training programs for women employees.
4. Organize regular specialized orientation programs for the members of the Internal Committee for dealing with the cases of sexual harassment.
5. Provide necessary assistance and facilities to the Internal Committee to deal with the complaint and for conducting inquiry.
6. Make available such information to the Internal Committee as may be required having regard to the complaint received.
7. Provide support to the Complainant if she so chooses to file a complaint in relation to the offence under the Indian Penal Code or any other law for the time being in force.
8. monitor the timely submission of reports by the Internal Committee.

L. MODIFICATION AND REVIEW OF THE POLICY

The Company reserves the right to modify and, or review the provisions of this Policy, to comply with applicable legal requirements, internal policies, or otherwise with a view to revise the provisions of this Policy to the extent deemed necessary by the Company from time to time.

Reviews will be initiated by the HR Department. Where changes in employment legislation occur that directly affect this Policy, these will be reflected with immediate effect and communicated through HR.
