



6. Policy of Sexual Harassment (POSH)

6.1 Objective

This policy aims to protect all our employees (men and women) from unwanted sexual advances and provide them with proper guidelines to report the incidents, if any grievances arise.

The purpose in implementing this policy is to describe workplace sexual harassment, how we can handle complaints about conduct that violates this policy, carry out appropriate disciplinary action in the case of violations and thereby prohibiting it in all forms.

SAT is committed to promoting a safe working environment that ensures professional growth of its employees and encourages equality of opportunity. There is a zero-tolerance policy towards sexual harassment at the SAT workplace in any shape or form.

6.2 Scope

This policy covers all employees, consultants, contractors, clients, and any other parties dealing with SAT.

6.3 References

International best practices

6.4 General Policy

SAT in compliance with reference to all applicable local, state and Central Government anti-discrimination and harassment laws and regulations, enforces this policy in accordance with the following policy elements:

Definition of sexual harassment

Sexual harassment is defined as "unwelcome sexual advances (whether directly or by implication), requests for sexual favors, and other verbal, nonverbal or physical conduct of a sexual nature, where such conduct has the purpose or effect of creating an offensive or hostile working environment.

Sexual harassment has many forms of variable seriousness and it can involve one or more incidents and actions constituting harassment may be physical, verbal, and non-verbal. Examples of conduct or behavior which constitute sexual harassment include:

- Making obscene comments, jokes or gestures that humiliate or offend someone.
- Proposing, demanding, or insinuating sexual favors of any kind.
- Flirting with somebody persistently without the other person's willing participation.
- Invading another person's personal space (e.g. inappropriate touching).
- Sending, creating, or posting sexually explicit objects or messages.
- Threatening, coercing, stalking, or intimidating another person to insist they engage in sexual acts.
- Demand or request for sexual favors (either explicitly or implicitly), in return for (or a term or condition of) employment or a promotion.





- Any other unwelcome physical, verbal, or other conduct of sexual nature against any employee, worker or connected person in the workplace during or after office hours.

Anybody can be a victim of sexual harassment, regardless of their sex or gender identity and that of the offending party. All sexual harassment is prohibited whether it takes place within the company premises or outside, including at social events, business trips, training sessions or conferences sponsored by the company.

Internal Complaints Committee (ICC)

SAT has instituted an Internal Complaints Committee to hear and redress complaints pertaining to sexual harassment. ICC is vested with power to address cases of sexual harassment that they observe or of which they become aware of through verbal and written complaints. The Committee will also advise the remedial actions in case of any complaint and assure confidentiality to protect both victim and accused to the possible extent.

Constitution of Internal Complaints Committee

The Internal Complaints Committee will comprise of the following four members:

1. Presiding Officer/Chairperson: Preferably a Senior Woman employee.
2. Members: Two members from among employees (Not less than half of the ICC members shall be women).
3. External Member - From an NGO or association committed in dealing with the issues related to sexual harassment (from civil society or legal background who has Sound grasp and practice of the legal aspects/implications).

The Presiding Officer or other members of the ICC shall hold office for a period not exceeding three years at a time, from the date of their nomination as may be specified by the employer (CEO/Director).

Powers and Functions of Internal Complaints Committee

- To receive, entertain, hear complaints lodged by victims of sexual harassment in the workplace and taking appropriate remedial measures.
- To develop an effective mechanism and steps in the matter of effective prohibition and prevention of acts of Sexual Harassment in workplace and suggest implementation of the same by notification and order.
- The Committee will make sure that neither victims nor the accused are further victimized or discriminated against while it is dealing with the complaint.
- The Committee shall act against anyone who intimidates the victim or members of the Committee, during or after the enquiry.

Frequency and mode of meeting

- The Internal Complaints Committee will act within 24hours on receipt of a complaint on sexual harassment.





- When making an enquiry to any complaint relating to sexual harassment, the Committee should consist of minimum three members including the Presiding Officer/Chairperson.
- There will be quarterly meeting (time duration: one hour) in which members of the committee will discuss on the report submitted, which consist of the complaints, actions, training done till date.
- The Presiding officer/Chairperson shall give notice of any meeting of the ICC by hand or email to other members at least 7 days in advance.
- ICC meetings can be held in SAT facility or any other appropriate facility recommended by Chairperson or over video conference.

Maintenance of Records

The Presiding Officer/Chairperson of ICC shall maintain records and registers needed for the purpose of registering complaints and conducting enquiry either in physical form or in electronic mode. Upon completion of any enquiry, the Presiding Officer/Chairperson should handover the collected materials such as duly signed statement of the victim, witnesses, involved parties, accused, video or audio recordings and material objects if any along with the settlement or recommendation made by ICC to the Director.

The Annual Report which the Internal Complaints Committee shall prepare will have the following details:

- Number of complaints of sexual harassment received in the year.
- Number of complaints disposed of during the year.
- Number of cases pending for more than ninety days.
- Number of mandatory training courses carried out.
- Nature of action taken by the Committee.

Complaint Mechanism

- Any aggrieved person who feels/presumes that she has been subject to sexual harassment in the workplace should immediately report or complain (in the written format) the incidence before the Chairperson of ICC.
- The complaint must be written in simple language which can be understood easily, it must contain the details of exact incident, date, and time, witness etc. and should be duly signed by the victim.
- Append as many documents as possible, i.e. relevant e-mails, screenshots of SMS's/WhatsApp messages, call details, photographs, recordings etc.
- Details of the accused including name, designation, reporting structure between victim and accused if any (whether subordinate or superior) is to be specified.
- Oral Complaints are to be lodged in person or by person accompanying the victim (on account of mental or physical incapacity of the victim) before the Chairperson or to any member of the Committee. Any member of the respective ICC as the case may be shall render all reasonable assistance to the aggrieved person for making the complaint in writing. It is pertinent to mention



that written complaint is required to be filed mandatorily with full names and details for seeking any action under the Policy.

- Complaints should be initiated within three months from the date of the occurrence of the mentioned incident.
- Anonymous complaints (in case where victim may wish to remain anonymous) will be recorded by the Committee. Proper action will be taken once Committee completes investigation on allegations.
- The mechanism for registering complaints will be safe and sensitive. The Committee ensures complete confidentiality of the entire proceedings.

Enquiry Procedures

A fair, prompt, and impartial inquiry process starts with the Internal Complaints Committee upon receipt of a complaint on sexual harassment. Breakdown structure of enquiry procedures are as follows:

- The Presiding Officer/Chairman of the Internal Complaints Committee will review the initiated complaint and supporting documents to determine whether the allegations made in the complaint fall under the purview of Company (SAT) Sexual Harassment Policy.
- A copy of the complaint without annexing supporting documents will be forwarded to the accused (via email or post) within 7 working days from receipt along with a notice to file his reply to the complaint along with list of documents, names and addresses of witnesses within a period 10 working days from the date of receipt of the notice.
- The Presiding Officer/Chairman will arrange to place before the meeting, the complaint and reply of the accused with supporting documents.
- The Presiding Officer/Chairman shall call meeting(s) of the committee for conducting the enquiry proceeding and call upon the aggrieved party (victim), and the accused to appear before the ICC and also call the witnesses from both the parties.
- The parties will not be allowed to present their case by legal practitioner in the enquiry proceeding and the enquiry proceedings will always be minuted or video recorded and the same be preserved and maintained by the Committee.
- The Committee should advise both the parties to avoid contact during the period of enquiry proceeding. In the event there are no witnesses, the Committee may have to resolve harassment claim based on the credibility of parties.
- The ICC may terminate the enquiry proceedings on the complaint, if the victim or the accused fails without sufficient cause to present any consecutive hearings convened by the respective committee.
- On completion of the enquiry under the policy, the ICC will provide a report of its findings to the employer (CEO/Director) within a period of 10 days of the date of completion of the enquiry. A copy of the report should be served both to the victim and accused.
- The employer is required to act on the recommendations of the ICC within 60 days of receipt of the Inquiry report. Appeal against the decision of the committee is allowed within 90 days from the date of recommendations.



Disciplinary action

If ICC arrives at a conclusion that the allegations against the accused has not been proved, it shall recommend the employer that no action is required to be taken in this matter.

If the ICC arrives at a conclusion that the allegations against the accused have been proved, it shall recommend the employer to take following actions:

- To deduct compensation payable to victim from the wages of accused.
- To take any disciplinary actions such as a written apology, warning, censure, undergoing counseling sessions, withholding of promotion, withholding of pay rise or increments (for a certain period) or carrying out community services.
- Terminating the accused from service.

Confidentiality

Recognizing the sensitivity attached to matters pertaining to sexual harassment, ICC prohibits dissemination of the contents of the complaint, identity and addresses of the victim, accused, witnesses, and other information relating to inquiry proceedings in any manner. All are treated confidentially and is revealed strictly on a need-to-know basis by the Internal Complaints Committee.

6.5 Responsibility and Accountability

The Human Resources Team (HRT) is responsible for administering and monitoring this policy. The HRT will inform all employees either through electronic form or distribute among the employees in a written format and get duly signed acknowledgement from employees for having read, understood, and abide by the policy.

It is the responsibility of the employee to ensure the contents of this policy is understood. Any form of non-compliance will be dealt with disciplinary action in accordance with Company's disciplinary action procedure.