



MONARCH
NETWORK CAPITAL

Monarch Network Capital Limited

Sexual Harassment Policy

Policy No. HR/13

1. Purpose

The Company seeks to establish and maintain a work environment free from harassment of all types - racial, ethnic, religious and/or sexual. The purpose of this policy is to define and familiarize employees with what amounts to sexual harassment and the procedure for dealing with offenders.

2. Applicability

It applies to all those women who are employed either on a permanent basis or temporarily, on an ad hoc or daily wage basis, either directly or indirectly through agents or contractors with or without knowledge of the principal employer whether working on remuneration or not. Further women working on voluntarily basis, as probationers, trainees and apprentices have also been included in the definition of employee.

It is applicable to the Monarch Group and all its subsidiary and affiliate companies. It extends to all the premises of the organization, including branches & other units directly or indirectly controlled by the organization. It also includes any place visited by the employee during the course of her employment, including the transportation provided by the employer.

3. Acts or Behaviors that constitute Sexual Harassment

Sexual harassment includes such unwelcome sexually determined behavior (whether directly or by implication) as:

- Physical contact and advances;
- A demand or request for sexual favors;
- Making sexually colored remarks;
- Showing pornography;
- Any other unwelcome physical, verbal or non-verbal conduct of sexual nature
- Implied or explicit threat about detrimental treatment, her present or future employment status or a promise of preferential treatment
- Creating an intimidating, offensive or hostile environment or rendering of humiliating treatment likely to affect health or safety

4. Resolution

The Internal Complaints Committee:

The process of Internal Complaint's Committee is undertaken in the following steps, in accordance with the applicable law and internal procedures:

1. Intimation

When an employee observes or becomes aware of a perceived incident of harassment, s he is required to report the same to her superior or any member of the Internal Complaints Committee in writing. Employee can also report it on hr@mnclgroup.com or email to any member of the Internal Complaints Committee.

2. Investigation

- The Complainant is required to provide a written complaint to any of the members of the Internal Complaints Committee at the earliest point of time, maximum within 3 months from the date of occurrence of the alleged incident; or in case of a series of incidents, within 3 months from the date of the last occurred incident.
 - She may also contact the Reporting Authority/ or the Human Resources Team who should direct the Complainant to the Internal Complaints Committee.
 - However, for better resolution of such occurrences, we encourage you to report this matter, without unnecessary delays.
- Where such complaint cannot be made in writing, the Presiding Officer or any other member of the Internal Complaints Committee shall render all assistance to the complainant to make the complaint in writing and as the case may be, extend the time limit not exceeding 3 months, if it is satisfied that the circumstances were such that prevented the woman from filing a complaint in writing.
- Where the aggrieved woman is unable to make a complaint on account of her physical or mental incapacity or death or otherwise, her legal heir or such other person may make a complaint.
- During the pendency of an inquiry, on a written request by the aggrieved woman, the Internal Complaints Committee may recommend to the Employer granting of a relief, as discussed by the aggrieved employee.

- The Complaint should contain all the material and relevant details concerning the alleged harassment including the name of the contravener offender.
- The identity of the parties involved will be kept confidential by the Internal Complaints Committee to the extent possible given the legitimate needs of law and the investigation.
- The Internal Complaints Committee will hold an enquiry into the matter. The Committee would be entitled to elicit all forms of evidence in this regard as well as enforce the attendance of any person and the concerned parties would be required to co-operate.
- Both parties will be given an opportunity to present their views to the Internal Complaints Committee during the investigation process.

3. Recommendation

- After examination of the complaint, the Internal Complaints Committee will submit a report of its findings along with its reasoned recommendations to the Employer and the concerned parties within 10 days from the closure of the enquiry, based on which a decision / further action will be taken by the Employer .
- Where sexual harassment occurs as a result of an act or omission by any third party or outsider, the Employer and the person in charge will take all steps necessary and reasonable to assist the affected person in terms of support and preventive action.

4. Remedies and penalties

- If the allegation(s) are proved, the Internal Complaints Committee shall recommend that the employer should
 - Take action against the respondent for sexual harassment as a misconduct in accordance with the provisions of the Employee Code of Conduct/ Policy Manual;
 - To deduct from the salary or wages of the respondent, such sum as it may consider appropriate so as to compensate the aggrieved woman.
- The employer is required to act upon it within sixty days of receipt of recommendation from the Internal Complaints Committee

5. False Allegation

If the allegation made by the aggrieved woman is found to be malicious or with malicious intent or knowingly false, the employer may take action against the woman as misconduct, in accordance with the provisions of the Employee Code of Conduct or such other recommendation of the Internal Complaints Committee.

6. Non-Implementation:

In case of non-implementation of recommendation any person may appeal to the court within ninety days.

5. Employee Guidelines

The Primary focus of this policy is to ensure a congenial work environment that is free from threat or fear. There are a few things employees can do to help translate the policy into day-to-day practices.

- Sexual harassment can take many forms: spoken, unspoken or physical. Recognize that you may be conditioned to accept behaviors that infringe on your rights and constitute discriminate or gender discrimination as normal workplace conduct.
- Firmly say NO . It is possible that the offender does not know that their behavior is unacceptable. Promptly make a direct statement and communicate that the offender's conduct is not acceptable.
- Participating in jokes and sexually tinged conversation is often taken as tacit permission to continue. Communicate early on that this conduct is unacceptable
- Warn the offender to immediately desist, first orally and then if necessary, follow it up with a warning in writing.
- If employees are unsure of the course of action to take in a given situation, they should approach any of the Committee members informally and take their counsel.
- Employees are also encouraged to discuss any issues they may have in this area to their Supervisor / HR representative / any member of the 'Internal Complaints Committee.
- If employees believe that they have been a victim of harassment, or know of another employee who has been, report it immediately. Employees can raise concerns and make reports without fear of reprisal.
- Retaliation against an individual for bringing or corroborating harassment or discrimination allegations is strictly prohibited, so long as such allegations or corroboration are made in good faith and are not knowingly false.