SRF FOUNDATION	**Policy against Sexual Harassment**	**Policy No.** : SRF F/HR/2025/4.1 **Supercedes** : SRF F/HR/2025/04 **Pages** : Page **1** of **6** **Date of issue** : Nov 01, 2025 **Effective Date** : Nov 01, 2025

BACKGROUND	• SRF Foundation is committed to creating a healthy working environment that enables employees to work without fear of prejudice, intimidation, gender bias and sexual harassment. The Foundation also believes that all employees of the Foundation have the right to be treated with dignity. • Any discriminatory treatment or harassment of employees in violation of Foundation Values or law will be met with appropriate disciplinary action. • The Supreme Court has also directed Organisations to lay down guidelines and a forum for redressal of grievances related to sexual harassment of women under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013.
POLICY PURPOSE	• To ensure that all individuals work in an environment free from all forms of sexual harassment. • To ensure that employees of SRF Foundation respect one another's dignity, privacy and enjoy equal treatment at the workplace. • To ensure that all cases of sexual harassment are dealt within a procedurally and substantively fair manner to prevent their recurrence; and • To comply with Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and rules made thereunder (hereinafter 'Act').
SCOPE	All employees of SRF Foundation in India

DEFINITIONS	**Sexual Harassment:**
	Sexual harassment would mean any or more of the following unwelcome acts or behaviours (whether directly or by implication):
	• unwelcome sexual advances, requests or demand for sexual favours, either explicitly or implicitly;
	• unwelcome sexual advances involving verbal, non-verbal, or physical conduct such as sexually colored remarks, jokes, letters, phone calls, e-mail, gestures, showing of pornography, lurid stares, physical contact or molestation, stalking, sounds, display of pictures, signs, verbal or non-verbal communication which offends the individual's sensibilities and affect her/his performance;
	• eve teasing, innuendos and taunts, physical confinement against one's will and likely to intrude upon one's privacy;
	• the following circumstances connected and related with act or behaviours of sexual harassment:
	  ○ implied or explicit promise of preferential treatment in employment;
	  ○ implied and explicit threat of detrimental treatment in employment;
	  ○ act or conduct by a person in authority which creates the environment at the workplace hostile or intimidating to a person belonging to the other sex;
	  ○ humiliating treatment likely to affect his/her health and safety.
	
	Any act will be deemed to be sexually offensive if so felt by the "receiver" and not the perpetrator.

	Employee: Employee means any person on the rolls of the Foundation, and those on deputation to the Foundation from a third-party vendor, contract, temporary, part time or working as consultants/trainees, probationers, apprentice, etc. For the purposes of this policy, and **only for the purposes of this policy,** the purport of 'employee' will be extended to cover all individuals working or otherwise present at the SRF Foundation. premises due to permanent or temporary employment with any of the service partners/providers or vendors, etc., of SRF Foundation. **Complainant:** Any person of any age whether employed or not, who alleges to have been subjected to sexual harassment and has filed the complaint under this policy. **Respondent:** Any person against whom the sexual harassment complaint has been made. **Employer:** For the purposes of this act, Employer shall be a person designated or acting as a Director - SRF Foundation **Internal Complaints Committees (ICC):** Committee(s) constituted under the Act to receive all complaints pertaining to sexual harassment and further perform all other functions, as provided in the Act. ***Note:*** *All the words and expressions used herein shall have the same meaning respectively assigned to them in the Act and Rules made thereunder, unless expressly provided otherwise.*
GUIDELINES	The **Internal Complaints Committees (ICC)** on Sexual Harassment will be formed for all administrative offices or units of SRF Foundation including zonal offices, for purposes as defined in the Act. The ICCs for all the locations will be nominated by Director - SRF Foundation. All complaints pertaining to sexual harassment will be received by the ICCs who shall further perform all other functions, as provided in the Act. **<u>Composition of the ICC:</u>** The ICC will consist of **at least** the following 4 members: • **Presiding officer**: A senior woman member employed at workplace from amongst employees. In case a senior woman member is not available, the person shall be nominated from other offices or administrative units of the organization.

- **2 women members** from amongst employees preferably committed to the cause of women or having legal knowledge.

- **A third-party representative** amongst non-governmental organizations or associations committed to the cause of women or person familiar with the issues of sexual harassment.

In total, the ICC should have at least 50% women.

The Presiding Officer and other members of the ICC will hold office for a period not exceeding three years from the date of nomination.

The Presiding Officer or any member of the ICC can be removed from the committee, if he/she :

- contravenes the provisions provided in the Act;
- has been convicted for an offense or an inquiry into an offense is pending against him/her;
- has been found guilty under any disciplinary proceedings or any disciplinary proceeding is pending against him/her;
- has abused his/her position, as to render his continuance prejudicial to public interest.

Filing a complaint:

- Complaints can be made through any of the following means within a period of 3 months from the date of the incident and in case of series of incidents within a period of 3 months from the date of last incident (such time limit of 3 months can be extended by the ICC for a further period of 3 months).

- **The Complaints can be made through**:
  - writing directly to the Internal Complaints Committee (ICC)
  - writing directly to the Director - SRF Foundation
  - writing directly to the Values Steering Committee

- All complaints received through any of these modes will be shared with the Values Steering Committee, Director – SRF Foundation within 5 working days of receiving such a complaint.
- All complaints will have to be made in writing along with the signature/thumb impression of the victim and submitted in the format available in Annexure I.
- In case the complaint cannot be made in writing, the ICC will provide all possible assistance to the complainant to make a complaint in writing.
- An employee can also file a complaint on behalf of any other individual provided the complainant so desires, however such employee must provide for a written consent from the complainant while making such a complaint.
- Where the complainant is unable to make the complaint on account of his/her physical or mental incapacity, his/her legal heir, relative or friend, co-worker, an officer of the National Commission for Women or States Women Commission or any person who has the knowledge of the incident can make a complaint.

- Where the complainant/victim is dead, the complaint may be filed by legal heir or any person who has the knowledge of the incident, with a written consent of the legal heir.
- At the time of filing the complaint, the complainant will submit to the ICC six copies of the complaint along with the supporting documents and the names and addresses of the witnesses (if any).
- On the receipt of the complaint, the ICC shall send one of the copies received from the complainant to the respondent/accused within a period of 7 working days.
- The respondent/accused will file his reply to the complaint along with his list of documents and names and addresses of witnesses (if any), within a period not exceeding 10 working days from the date of receipt of the complaint.
- The ICC shall make inquiry into the complaint in accordance with the principles of natural justice.

Complaint Handling:

- The ICC will receive complaints directly or through other means as mentioned in the procedure above and will take up each complaint for mediation/conciliation or other legal remedy, as promptly as possible and not later than 10 days from the date of receiving the complaint.
- The ICC will inquire into the complaint observing the principle of natural justice and maintaining the norm of gender sensitivity, taking cognizance of all aspects of the incident, the time, place and the context.
- Before initiating the inquiry and at the request of the complainant, ICC will take steps to settle the matter between the complainant and the accused through conciliation, provided that no monetary settlement will be the basis of such conciliation.
- Where such a settlement has been arrived at, the ICC will record the settlement so arrived and forward the same to the Director – SRF Foundation, who will forward this to Values Steering Committee.
- In the case of the ICC being at HO, such a settlement will be forwarded to Director – SRF Foundation.
- Copies of the settlement will be provided to the complainant and the respondent.
- Where the settlement is so arrived at, no further inquiry will be conducted by the ICC.

Relief to Complainant during pendency of Inquiry:

- The ICC, in exceptional circumstances, and on the written request of the complainant, may accord relief to the complainant during pendency of the inquiry. This may include temporary transfer/leave, and will be based on merit of the case. Such relief will be granted if the ICC is convinced that the outcome of the inquiry will be better placed if this relief was granted and/or to safeguard the interest of the complainant**.**

Conducting Inquiry:

- In conducting an inquiry, a minimum of half the members of the ICC (subject to a minimum of three members) including the Presiding Officer shall be present.
- The complainant and the accused shall be given reasonable opportunity to present and defend their cases. Witnesses may be called as deemed necessary.

- The ICC will have the right to terminate the inquiry proceedings, or to give an *exparte decision* on the complaint, if the complainant or the respondent fails, without sufficient

cause, to present herself or himself for three consecutive hearings convened by the Chairperson or the Presiding officer, as the case may be; provided that such termination or *exparte* order may not be passed without giving a written notice 15 days in advance to the party concerned.

- The parties shall not be allowed to bring in any legal practitioner to represent them in their case at any stage of the proceedings before the ICC.
- The ICC shall have the right to disallow questions from the victim or the accused, if the questions are deemed irrelevant and unnecessary.
- ICC shall complete the inquiry in the shortest possible time, not exceeding 60 working days from the date on which the complaint is referred to it, except for special reasons, which will be recorded in writing and permission obtained from the Director – SRF Foundation
- The ICC will submit the report to the Employer, i.e., Director – SRF Foundation within 10 days of completion of the inquiry with the findings of the investigations and recommendations for penalty.
- The HR Head will forward a copy of this report to the Director – SRF Foundation within 5 working days of the receipt of the report from ICC, who will then take it to the Values Steering Committee within the next 5 working days post receiving the report from the HR Head.

Manner of taking action for Sexual Harassment:

- Where the ICC arrives at the conclusion that the allegation against the respondent has **not** been proved, it shall recommend that no action is required to be taken in the matter.
- Where the ICC arrives at the conclusion that allegation against the respondent has been proven, it shall recommend to take action as per the defined service rules/Code of Conduct/Act or take any action, including but not limited to the following:
    - a written apology
    - warning, reprimand or censure
    - withholding of promotion for one year or more
    - withholding of pay rise/increments
    - suspension from service
    - dismissal/termination from service, or
    - undergoing counselling/carrying out community service

- In taking action against the accused, if found guilty, Director – SRF Foundation will consider suggestions of the Values Steering Committee and shall act upon the recommendations within 15 working days of the receipt of the report.
- The Values Steering Committee will make an annual report on complaints received and action taken and present to the Director – SRF Foundation.
- The details of the penalty awarded will be recorded in the personal records of the guilty.

Note: Confidentiality will be maintained to the extent possible, in the interest of maintaining good relations in the workplace.

False Complaints:

	• If a complaint is found to be false after investigation/inquiry, the committee will recommend to the Director – SRF Foundation with a copy to Values Steering Committee to impose an appropriate penalty on the complainant in accordance with the service rules/Code of Conduct, to discourage the possibility of recurrence of such motivated complaints. • However, a mere inability to substantiate or provide adequate proof need not attract action against the complainant and any malicious intent on the part of the complainant shall be established only after inquiry before any action is recommended in this regard.
Annexure	I - Complaint Form II- Internal Complaints Committee