

Prohibition and Redressal of Sexual Harassment Policy

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Objective

- It is the purpose of this policy to formalize the company's philosophy regarding gender sensitization and dignity of employees and the prohibition and prevention of sexual harassment of women employees in the workplace and redressal of complaints of sexual harassment.
- To Make WFSBPL work environment comfortable for employees where men and women work together with a sense of security and dignity and to strengthen the value of "Respect for Individual".

Scope

This Policy covers all staff employed in WFSBPL.

Policy:

Constitution of India: -

This policy has been implemented keeping in mind The Constitution of India.

- Article 14: Ensures Right to Equality including Gender Equality.
- Article 15: Prohibits discrimination on grounds of religion, race, caste, sex or birth of place.
- Article 16: Provides for equality of opportunity in public employment.

Conducive work culture & working environment: -

WFSBPL is committed to take proactive approach towards creating a supportive culture through

- Consistent approach
- Collective responsibility
- Creating inclusive environment.
- Ensure a workplace fostered with professional language and conduct.

Meaning of Sexual Harassment under the Policy

The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 ("Act") has defined sexual harassment at workplace as;

"Unwelcome sexually determined behaviour" (whether directly or by implication) as:

- Physical contact or advances.
- A demand or request for sexual favour.
- Making Sexually colored remarks
- Showing pornography
- Any other unwelcome, physical, verbal or non-verbal conduct of sexual nature.

Meaning of Sexual Harassment at the workplace: -

- Sexual harassment in the workplace occurs when submission to such conduct is made an implicit condition of an individual's employment.

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- Submission to or rejection of such conduct affects or is affecting the employment opportunities of an individual.

Indicative Examples of Sexual Harassment: -

- Implicit or explicit promise of preferential treatment in employment;
- Implicit or explicit threat of detrimental treatment in employment;
- Implicit or explicit threat to individual about present or future employment status;
- Interference with Individual work or creating an intimidating or offensive /hostile work environment;
- Humiliating treatment likely to affect individual health or safety.
- Subjects another person to an unwelcome act of physical intimacy like grabbing, brushing, touching, pinching etc.
- Unwelcome demand or request (whether directly or by implication) for sexual favours from another person and further makes it a condition for employment or payment of wages or increment/promotion.
- Making sexually explicit compliments / remarks / jokes etc.
- Showing explicit visual material i.e. pin - ups, cartoons etc.

Scope of Workplace:-

It's any place where working employer/employee relations exists.

It's defined as any place within the premises of the organization or outside the premises where such behaviour is connected with employment, including:

- Employees' office premises and workstation/space within organization;
- All spheres/settings that remain in contact with employees and outsiders in connection with their employment such as parking spaces;
- Such spaces include not just the physical premises under the supervision of the organizational system, but even areas, where the employees reside or travel to as part of their work as employees of the organization.
- Where any such behaviour conducted within or outside the premises that would make the workplace hostile or intimidating for any employee of the organization.
- Extended workplace ex.: Company bus, Office function and parties, off sites.

Types of Sexual Harassment:

Hostile Work Environment

- When the conduct in question unreasonably interferes with an individual's job performance or creates intimidating, hostile or offensive working environment and that adversely affects that employees' ability to do his or her job.

Quid Pro Quo Harassment

- Quite literally means "this for that", implying that employment decisions or expectations are based on an employee's willingness to grant or deny sexual favours.

Roles & Responsibilities

1. Employees: -

- Watch your conduct.
- Be aware of the guidelines
- Report any incident of sexual harassment to IC or write an Email to poshcomplianceblr@wfs.aero.
- Cooperate in investigation

2. Employers: -

- Create workplace environment that promotes respect, diversity and inclusion.
- Provides a safe working environment at the workplace which shall include safety from the persons coming into contact at the workplace;
- Promote awareness on gender sensitization including organising workshops and awareness programmes at regular intervals for sensitizing the employees and the members of the Internal Complaints Committee with the provisions of the Act.
- Set up redressal committee namely Internal Committee (IC).
- Investigate complaints promptly and in fair manner.
- Protect employees from any retaliation.
- Encourage employees to bring instances of harassment to the knowledge of the management / IC.
- Display at any conspicuous place in the workplace the penal consequences of sexual harassment and the order constituting the IC.
- Provide necessary facilities to the IC for dealing with the complaint and conducting an inquiry.
- Assist in securing the attendance of respondent and witnesses before the IC.
- Make available such information to the IC as it may require having regard to the complaint.
- Provide assistance to the woman if she so chooses to file a complaint in relation to the offence under the Indian Penal Code or any other law.
- Cause to initiate action, under the Indian Penal Code or any other law, against the perpetrator.
- Treat sexual harassment as a misconduct under the service rules and initiate action commensurate for such misconduct.
- Monitor the timely submission of reports by the IC.

Steps to be taken if you are being Sexually harassed:-

- Approach the IC or write an email to poshcomplianceblr@wfs.aero.
- Explore all the possible and relevant facts & findings

Steps to be taken if you are a witness to Sexual harassment:-

- Speak Up - Inform the harasser that his/ her actions may be perceived as sexual harassment.
- Support the victim – Provide comfort and assurance to victim.
- Report the Incident - Talk to appropriate person within the department /IC and report the matter as per the mentioned guidelines.

Steps to be taken if you are the Functional Manager / HOD:-

- Take the allegations seriously.
- Take immediate action as per the guidelines such as reporting the matter to IC or by writing an email to poshcomplianceblr@wfs.aero.
- Pay attention to work environment.

Disciplinary Action:-

Depending on the graveness

- Verbal or written apology to the complainant.
- Guilty receiving verbal or written reprimand.
- Suitable change in reporting, location, team etc.
- Holding back annual incentive and/ or increment/promotion for a specific period of time.
- Termination of employment

Note: -

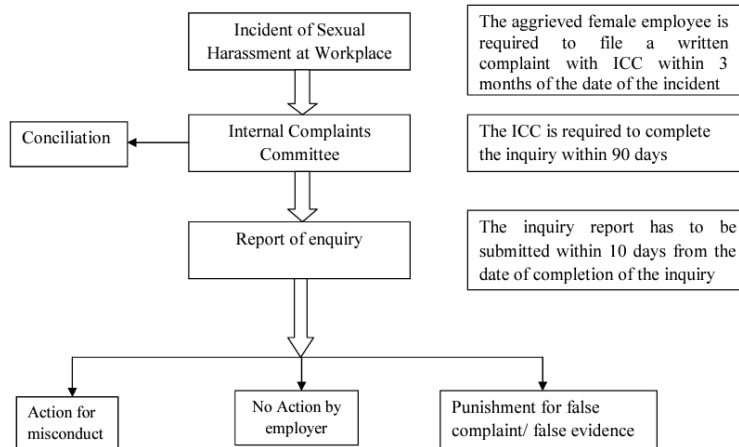
- “Disciplinary action will be commensurate with the level of misdemeanour.”
- “Disciplinary action will be taken against the complainant in case of false complaint.”

Procedure for Redressal:-

- Any employee who believes that he/she has been subjected to conduct that violates this policy by any supervisor, management official or other employee, customer, client, vendor, independent contractor or any other person in connection with his/her employment at the Company is required to immediately notify to the IC or members thereof.
- Any employee who witnesses conduct which may violate this policy or who learns conduct directed toward others which may violate this policy is also required to immediately report the matter to the IC or members thereof.
- A prompt, thorough investigation of all sexual harassment allegations will be conducted by the Company through IC in as confidential a manner as possible. Any form of retaliation against an individual who reports sexual harassment or who assists or cooperates in a sexual harassment investigation is strictly prohibited and will subject the offender to corrective action, including disciplinary action up to and including termination. Any employee who believes he/she has been subject to retaliation in violation of this policy is required to immediately notify to the IC or members thereof.
- Upon completion of the investigation, any employee who is found to have engaged in conduct that violates this policy will be subject to appropriate corrective action, including disciplinary action up to and including termination.

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Procedure for filing complaint and conducting enquiry



Internal Committee (IC) may be approached for lodging complaint at: poshcomplianceblr@wfs.aero or [080-68266203](tel:080-68266203)

Version	2
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