

Prevention of Sexual Harassment Policy

1) Why this Policy?

CIEL is in the business of recruiting and staffing, enabling companies to use talent either for a fixed period of time for specific projects or for permanent roles there. And in this process, it helps individuals find work and enrich their career with valuable work experience.

CIEL deeply values the human resources who either run its business or enable it right from finding companies looking for its services to delivering the solutions they need. This policy outlines CIEL's approach to establish a safe, dignified and fair work environment for its MEMBERS (employees who work in CIEL).

CIEL has a very diverse workforce. They come from many races and communities. We recognize the challenges and opportunities presented by a diverse and changing workforce. This policy aims at fostering a work environment free from discrimination of all kinds. We recognize the unique qualities inherent in a diverse workforce and seek to achieve a culture where differences are considered as necessary assets.

2) Guiding principles for this policy

CIEL is committed to promoting a work environment that emphasizes equality of opportunity and freedom from fear of harassment for all its members, and is particularly keen on empowering its women members to create an atmosphere where all can work with dignity. It shall ensure that we shall have a workplace free of sexual harassment. Our policy prohibits all members from engaging in unwelcome sexual conduct or making unwelcome sexual overtures, visual, verbal, or physical.

The policy has been framed in accordance with the Prevention of Sexual Harassment Act.

3) Conduct at Work

CIEL asks its MEMBERS to refrain from sexually harassing behaviour directed towards members, customers, vendors or anyone else. Unwelcome sexual advances, requests, or demands for sexual favours, and other visual, verbal or physical conduct of a sexual nature constitute harassment when:

1. unwelcome sexually determined behaviour (whether directly or by implication) as making or attempting to make, through innuendos or otherwise
2. Inappropriate physical contact, advances, or any other unwelcome verbal or non-verbal conduct of a sexual nature
3. A demand or request for sexual favours, or
4. Verbal abuse and usage of language that have sexual implications.
5. Conducting one-to-one meetings in non-official locations without the consent of the parties involved.
6. Exchanging or circulating e-mail / mail / messages with sexual overtones
7. Showing or attempting to show pornography or obscene material.

Explanation 1: 'Sexual Harassment' shall also include the following:

01. Unwelcome sexual advances, requests for sexual favors, and/or verbal or physical conduct of a sexual nature made, either explicitly or implicitly, in return for a term or condition of instruction, employment, participation or evaluation of a person's engagement in any company activity.
02. Unwelcome sexual advances and/or verbal, nonverbal, or physical conduct such as loaded comments, remarks or jokes, letters, phone calls or through e-mail, gestures, showing of pornography, lurid stares, physical contact or molestation, stalking sounds or display of a derogatory nature having the purpose or effect of interfering with an individual's performance or of creating an intimidating, hostile or offensive environment.
03. Forcible physical touch or molestation, and
04. Eve teasing, innuendos and taunts, physical confinement against one's will and any other act likely to impinge upon one's privacy.
05. Any act or conduct by a person in authority and belonging to one sex which denies or would deny equal opportunity in pursuit of career development or otherwise making the environment at the work place hostile or intimidating to a person belonging to the other/same sex.

Explanation 2: Further, any such act would be considered a harassment if committed in circumstances where the victim of such conduct has a reasonable apprehension that in relation to the victim's employment or work (whether he/she is drawing salary, or honorarium or voluntary), such conduct can be humiliating or can cause a health and safety problem, or when he/she believes that his/her objection to such act would disadvantage her in connection with the employment or work including recruiting or promotion or when he/she believes that his/her objection to such act would deny him/her an equal opportunity in pursuit of career development or when the act itself or his/her objection to it creates a hostile or intimidating work environment, or when he/she believes that adverse consequences might be visited if the victim does not consent to the conduct in question or raises any objection thereto.

Scope of the policy

This Policy and Guidelines will be applicable to all incidents and complaints of Sexual Harassment made by a MEMBER against another MEMBER or a third party connected with the Group, irrespective of whether the acts of sexual harassment complained of are alleged to have taken place within or outside the Company premises. This Policy and Guidelines will also be applicable to all incidents and complaints of sexual harassment made by a third Party against a MEMBER, if the acts of sexual harassment complained of are alleged to have been committed in his/ her status of and capacity as a Member of the Group.

Internal Complaints committee

CIEL has a Complaints Committee (CCC) to deal with any Complaints of Sexual Harassment. The Committee (CCC) shall be adequately representative and be at the management level. The following are the scope of activities of the Committee:

- I. To be the grievance redress forum for investigating complaints of sexual harassment and recommending appropriate punishment.
- II. To advise on the provision of counselling or other appropriate support to victims of sexual harassment.

Composition of CIEL Complaints Committee (CCC)

- a) Presiding 'Officer' who 'shall be a woman employed at it senior level at workplace from amongst the employees;
- b) not less than two Members from amongst employees 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.

The Presiding Officer and every Member of the internal Committee shall hold office for such period, not exceeding three years, from the date of their nomination.

Complaint Redressal Process

Any aggrieved member may make, in writing, a complaint of sexual harassment at workplace to CCC (info@cielhr.com) 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:

Provided that where such complaint cannot be made in writing, the Presiding Officer or any Member of CCC shall render all reasonable assistance to the woman for making the complaint in writing. Moreover, CIEL's centralized phone line (+91 7816 000 111) and email (info@cielhr.com) are available for the MEMBER to raise a complaint.

Provided further that the CCC may, for the reasons to be recorded in writing, extend the time limit not exceeding three months, if it is satisfied that the circumstances were such which prevented the woman from filing a complaint within the said period.

If the aggrieved MEMBER takes steps to settle the matter between her and the respondent through conciliation and without a monetary settlement for the conciliation, CCC might decide to drop the inquiry. Similarly, where a settlement is arrived at under sub-section (I) of the Act, no further inquiry will be held.

CCC will inquire into the complaint quickly and act on it as per the provisions of the terms of employment. Besides, if prima facie a case exists, CCC will forward the complaint to the police, within a period of seven days for registering the case.

On the completion of an inquiry under this Act, CCC shall provide a report of its findings to the Board within a period of 10 days from the date of completion of the inquiry and such report will be made available to the concerned parties. Where

CCC, as the case may be, arrives at the conclusion that the allegation against the respondent has not been proved, it will investigate the motive behind the complainant and take appropriate actions as per the terms of employment.

The Committee will have the power to investigate, counsel and create awareness.

Members of Internal Compliant Committee are:

- Presiding Officer: Latha Rajan, Founder and Director, CIEL
- Kavitha Vivek, Legal Counsel, Ma Foi Group
- Yasmin Vaidya, Head – Recruiting business, IT Vertical, CIEL

4) As a CIEL MEMBER, you have the right to:

- a) Work in places which provide freedom from fear of sexual harassment, and is particularly keen on empowering its women members to create an atmosphere where all can work with dignity
- b) Inform CIEL about issues or concerns pertaining to sexual harassment.

5) As a CIEL MEMBER, you are responsible for:

- a) Discerning the behaviours of others towards you and checking if the behaviour experienced by you is offensive by most others and unacceptable for your friend, spouse, partner, children or siblings.
- b) Informing CIEL about issues or concerns pertaining to sexual harassment.
- c) Behaving with others in a way that is NOT offensive and unacceptable

6) Policy Review

Management review is held each year to review implementation of this policy and draw upon further improvements for the following year. These improvements will include the policy itself and the associated business processes to attain objective of this policy.