

**PREVENTION AND REPORTING OF SEXUAL
EXPLOITATION, ABUSE AND HARASSMENT (PRSEAH)
POLICY**

CHIP Training & Consulting Pvt. Ltd

1. Policy Brief and Purpose

PRSEAH policy aims to safeguard employees of all sexes and gender identities from unwanted sexual advances (sexual exploitation & abuse and harassment) and provide them a safe and conducive working environment. It provides guidance to report actual or suspected incidents of any type of unwanted sexual advances and also explains how CTC address and handle complaints and take actions against offenders.

CTC has zero tolerance for any type of Sexual Exploitation and Abuse (SEAH) and Sexual Harassment (SH) at workplace. Additionally, CTC will not tolerate Sexual Exploitation and Abuse (SEAH) and Sexual Harassment (SH) of any nature from outside the company either from its stakeholders or vendors. CTC employees have an obligation to uphold high standards of personal and professional conduct and must not misuse their position and authority to exploit others.

2. Scope

This policy applies to all employees of CTC or anyone working for and under any form of contract with company including interns, customers, contractors and consultants. The policy is applicable regardless of the location of the individual.

3. Policy Statement

Sexual Exploitation Abuse and Harassment- (SEAH) definitions

1. SE: Sexual Exploitation is defined as an attempted or actual misuse of authority over a vulnerable position having power differentials or trust, for sexual purposes, including, but not limited to, proposing monetary benefits, social or political incentives in the form of the sexual exploitation of another.
2. SA: Sexual Abuse is defined as the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.
3. SH: Sexual Harassment is any unwelcome sexual advance, request for sexual favour, verbal or physical conduct or gesture of sexual nature, or any other behaviour of a sexual nature that might reasonably be expected or be perceived to cause offense or humiliation, when such conduct interferes with work, is made a condition of employment or creates an intimidating, hostile or offensive work environment. Sexual harassment may occur in the workplace or in connection with work. While typically involving a pattern of conduct, sexual harassment may take the form of a single incident or series of incidents. Sexual harassment may be deliberate, unsolicited and coercive. Both male and female colleagues can either be the victims or offenders. Sexual harassment may also occur outside the workplace and/or within working hours or even after working hours.
4. "Sexual Harassment is unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature when:

5. submission to such conduct is made either explicitly or implicitly
6. submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting the target individual
7. such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile or offensive working environment.

The attempts of SEA and SH include but are not limited to:

8. Physical approaches or physical contact of sexual nature.
9. Generalized gender-based remarks and comments targeted at eliciting any kind of response from any particular person (s) from amongst the target audience.
10. Unwanted physical contact such as intentional touching, grabbing, pinching, brushing against another's body or impeding or blocking movement.
11. Verbal or written sexually suggestive or obscene comments, jokes or propositions including letters, notes, e-mail, invitations, or inappropriate comments about a person's clothing, manners, gestures, gait, smile or laughter.
12. Visual contact, such as ogling, leering or staring at another's body, gesturing, displaying sexually suggestive objects, cartoons, posters, magazines or pictures of scantily clad individuals.
13. Explicit or implicit suggestions of sex by a supervisor or manager in return for a favorable employment action such as hiring, compensation, promotion, or retention.
14. Invitation for meeting to inappropriate locations.
15. Suggesting or implying that failure to accept a request for a date or sex would result in an adverse employment consequence with respect to any employment practice such as performance evaluations or promotional opportunity.
16. Continue to engage in certain behaviors of a sexual nature after an objection has been raised by the target of such inappropriate behavior.

4. Core Principals Relating to Sexual Exploitation and Abuse and Sexual Harassment at Workplace

1. CTC will not tolerate acts of its employees and or anyone working for and under any form of contract with company that results in the sexual exploitation or abuse of child or adult, helps facilitate SEAH or where allegations of SEAH are ignored.
2. Sexual exploitation and abuse by CTC employees constitute acts of gross misconduct and are therefore grounds for disciplinary actions including termination of employment contract.
3. Sexual activity with children (persons under age of 18) is prohibited regardless of the age of majority or age of consent locally. Mistaken belief regarding the age of child is not a defense.
4. Exchange of money, employment, goods or services for sex, including sexual favors or other forms of humiliating, degrading or exploitative behavior is prohibited.
5. Any sexual relationship between CTC employees and anyone working in connection to CTC i.e. third party staff, contractors, vendors, consultants, that involves improper use of position and conduct is prohibited. Such relationships undermine the credibility and integrity of CTC employees.
6. If a CTC employee develops concerns or suspicions regarding sexual abuse or exploitation or harassment by a fellow employee, whether in the CTC or other organization, he or she shall report it as per prescribed reporting mechanism.

7. CTC employees are obliged to create and maintain an environment which prevents sexual exploitation, abuse and harassment and promotes the implementation of its code of conduct. Senior management and managers at all levels have collective responsibilities to support and develop systems which maintain this environment.
8. All staff members are expected to act with empathy, tolerance, sensitivity and mutual respect for diversity. They have the obligation to ensure that they do not engage in, condone, or tolerate behavior, which would constitute discrimination, harassment, sexual harassment, or abuse of authority.
9. CTC shall prevent SEAH and harassment incidents through implementation of this policy to safeguard its staff and stakeholders.

5. Reporting process for CTC Employees

- 5.1. Immediate supervisor or Manager:** Employees who believe that they have been subjected to any form of discrimination or harassment or who witnesses others being subjected to such harassment or discrimination are encouraged to first approach their immediate supervisor. This allows for a direct and immediate resolution within the work unit.
 - 5.2. CTC Management:** If an employee is uncomfortable reporting the incident to their supervisor, they have the option to approach any member of CTC management. This ensures employees have multiple avenues to seek assistance or file a complaint.
 - 5.3. HR Director:** Employees also have the option to report an incident directly to the HR Director. This step may be appropriate if the employees feel that their immediate supervisor or manager is involved in the harassment or if they prefer to involve HR from the outset.
 - 5.4. CTC Disciplinary and Complaint Management:** Another option available to employees is to report an incident through various channels, including email, phone call, hotline or, through clients. Staff working on disciplinary and investigation functions specializes in handling and investigating complaints related to harassment and discrimination. They guide employees through the reporting process and ensure a thorough investigation takes place.
6. **Confidentiality and Secrecy:** The matter is treated with confidentiality, meaning that the information shared during the investigation is kept private and disclosed only to those directly involved in the investigation process. This approach helps protect the privacy and well-being of all parties involved.
 7. **Remedial Actions:** Upon completing the investigation, the focal person of harassment in consultation with the relevant stakeholders, may determine appropriate remedial action. These actions can include various measures such as counselling, training, intervention, mediation, or disciplinary action. The severity of the action taken may depend upon the seriousness of the offence.
 8. **False Accusation or Good Faith complaint:** It is crucial to recognize that complaints made in good faith, even if found to be unsubstantiated. This ensures that employees feel encouraged and come forward without fear of retaliation to register a complaint, as long as their complaints are genuine and without any malicious intent.
 9. **Penalties for SEAH**

The consequences for employees found guilty of sexual harassment (excluding sexual assault, for which they will be dismissed) are as follows:

- a. Demotion.
- b. Written warning.
- c. Suspension
- d. Negative performance review.
- e. Denial of promotion and/or salary increases for one year.
- f. Dismissal for repeat offence

10. Investigation Mechanism for SEAH Complaints

10.1. Complainant Submission: Complainant can submit their complaint vis email or phone providing their name, designation, and work location. This enables complaint officer to contact and proceed with the matter.

10.2. Initial Assessment: The Disciplinary and complaint management Associate will review the case to determine if the complaints fall under the purview of sexual harassment. This assessment should ideally be completed within two days from the receipt of complaint. If the CMA determines that the allegation constitutes an act of harassment, the case is forwarded to the complaint committee for further investigation.

10.3. Investigation and Reporting: the complaint committee is responsible for conducting a timely investigation into the complaint. They should submit a written report with their findings and recommendation to the HR Head and the relevant client focal person within 10 days from the receipt of the complaint. The HR Head then ensures appropriate corrective action is taken based on the recommendation provided by the committee.

10.4. Corrective Action: the corrective actions may vary depending on the specific circumstances of the case. This may include:

- a. Formal apology
- b. Counselling
- c. Written warning
- d. Transfer of position
- e. Suspension and termination

10.5. False complaint: if the complaint is found to be false, appropriate action may be taken against the complainant by the management, adhering to due process.

11. Inquiry Committee

11.1. Investigation and Adjudication: The inquiry committee is responsible for thoroughly investigation and making decisions on complaint received related to the violation of the policy. Their role involves gathering relevant information, interviewing involved parties, examining evidences, and reaching a conclusion based on the investigation's findings.

11.2. Committee Composition: the committee consist of 3 to 5 members with at least one member being female and the other member from senior management either from the Head office or Regional office.

11.3. Desired qualities: Committee members are chosen for their principled, fair, credible and their gender-sensitive characteristics. They are expected to demonstrate strong personal integrity, making decisions based on facts without any pressure from colleagues, friends, or seniors and should have no conflict of interest concerning the specific case they handle.

11.4. Training and Support: CTC provides training to the inquiry committee members on investigation techniques and the prohibited acts outline in the policy. Additionally, Compliant Management Associate role is to assist the committee, it includes organizing the meeting, serving as a liaison between inquiry committee and involved parties, maintaining records and updating a database to track complaint processing.

12. External Victims/Harassers

1. If any person outside CTC is believed to be the victim of sexual abuse and exploitation or harassment, the victim will be guided and referred to the concerned department for dealing with the matter.
2. If any person outside CTC is believed to be the harasser, CTC will take up the case and will report it to the concerned department/organization.

13. Review Process

This policy will be reviewed every year by the HR Team in consultation with the Managing Director and the directors of the concerned departments, unless an earlier need is identified by Management, or HR.

Annex 1

Degrees of Harassment

Serious	Minor
Sexually suggestive written comments including verbal, message sent through SMS Unwelcome sexual advances of any sort; Serious discrimination in allocating work based on gender, caste, religion. Nepotism and undue influence.	An argument between two involving yelling / shouting. Use of derogatory, racial, discriminatory remarks of less intensity Insulting by making personal remarks
Physical Abuse (pushing or any other means of inflicting physical harm) Blackmailing and Exploitation. Repeatedly instigating someone to react by indulging them in baseless arguments Use of abusive language Slandering, Bullying Abuse of authority (asking for non-sexual favors) Collecting fines from subordinate staff under duress.	Deliberate lack of Supervision Or poor supervisor's attitude
Promising recruitment, promotion, increments for sexual or non-sexual favours. Abuse of authority (sexual favours) i.e., Threatening loss of job/ wrongly reporting where staff fails to accept request for date / sex or any other favours. Retaliation. Intentional and unwanted physical contact that makes the staff uncomfortable such as touching, grabbing etc. Repeated bullying Victimized for lodging a formal complaint.	Intentionally providing misinformation to the senior supervisor. Misuse of power for granting excessive or unnecessary leaves (3 or less days) or anything in which his/her approval is required

Annex-2

CTC PRSEAH Acknowledgement Form

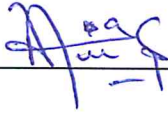
Name of Employee/Consultant/ Vendor/ Enumerator: Amina Batool

Position: IT Associate

Department: IT

I have received, read and I fully understand the CTC PRSEAH policy included in the CTC ESR manual.

I understand its contents and agree to comply with the guidelines set out in the subject policy and understand that failure to comply may result in disciplinary or legal action(s).

Date: 06, March, 2024 Signature: 

Please sign and return to HR Team. This document will be filed in the personal file.