



CRSP Capital Private Limited

Prevention of Sexual Harrassment

Registered Office: CRSP Capital Private Limited, 9 Kothari Bhawan, E Road, Bhupalpura, Udaipur (Raj.) -313001.

Website: www.crspcapital.com

Email: info@crspcapital.com

Create By: Thomas Mathew

Approved By: Dushyant Singh Rathore

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1.0. Introduction

CRSP Capital Private Limited is committed to make its workplace a great place to work, which entails promotion of an environment of openness, safety and sensitivity for all employees. A major factor that contributes to a safe work place is the complete prevention of sexual harassment at workplace.

Pursuant to our Company's commitment to make its workplace a great place to work for all our employees and furthermore, in strict compliance with the Sexual Harassment of Woman at Workplace (Prevention, Prohibition & Redressal) Act 2013 and the Rules framed thereafter, this policy is formulated.

2.0. Objectives of the Policy

- To ensure no person is sexually harassed at workplace.
- To promote gender sensitivity at workplace
- To promote conducive work environment for both the genders.
- To comply with legal/mandatory obligations as mandated in "Sexual Harassment of Woman at Workplace (Prevention, Prohibition & Redressal) Act 2013 and the Rules framed by the Central Govt. and as per December 2013 gazette.

3.0. Scope of the Policy

This policy is applicable to all employees across all locations of CRSP Capital Private Limited

4.0 Policy

Harassment will not be permitted or will not be condoned within the organization whether it be based on a person's race, color, ethnic or national origin, age, gender, real or suspected sexual orientation, religion or perceived religious affiliation, disability, or other personal characteristic.

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4.1 Definition of Sexual Harassment

According to The Supreme Court definition, sexual harassment is any unwelcome sexually determined behavior, such as:-

- ❖ Physical contact
- ❖ A demand or request for sexual favours
- ❖ Sexually colored remarks
- ❖ Showing pornography
- ❖ Any other physical, verbal or non verbal conduct of a sexual nature
 - Sexual Harassment takes place if a person Subjects another person to an unwelcome act of physical intimacy, like grabbing, brushing, touching, pinching etc.
 - Makes an unwelcome demand or request (whether directly or by implication) for sexual favors from another person, and further makes it a condition for employment/payment of wages/increment/promotion etc.
 - Makes an unwelcome remark with sexual connotations, like sexually explicit compliments/cracking loud jokes with sexual connotations/ making sexist remarks etc.
 - Shows a person any sexually explicit visual material, in the form of pictures/cartoons/pin-ups/calendars/screen savers on computers/any offensive written material/pornographic e-mails, etc.
 - Engages in any other unwelcome conduct of a sexual nature, which could be verbal, or even non-verbal, like staring to make the other person uncomfortable, making offensive gestures, kissing sounds, etc.
 - It is sexual harassment if a supervisor requests sexual favors from a junior in return for promotion or other benefits or threatens to sack for non-cooperation.
 - It is also sexual harassment for a boss to make intrusive inquiries into the private lives of employees, or persistently ask them out.
 - It is sexual harassment for a group of workers to joke and snigger amongst

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themselves about sexual conduct in an attempt to humiliate or embarrass another person.

4.2 Responsibility

Any Supervising Authority (employees with one or more people reporting to him / her) are expected to take the necessary steps to ensure that employees have the right to work in an environment free from harassing, intimidating or offensive behavior. Supervisors shall consider fully all complaints directed to their attention, maintain confidentiality to the fullest extent compatible with resolving the complaint, and disclose all reports of harassment to management.

All employees are expected to take personal responsibility to ensure that their behavior is not contrary to this policy and for upholding organization standards by treating with dignity and respect, all job applicants, fellow employees, customers, contract and temporary personnel and any other individuals associated with CRSP Capital Private Limited

5.0 Formation of Complaints Committee

In conformity with the Sexual Harassment of Woman at Workplace (Prevention, Prohibition & Redressal) Act 2013 and the Rules an Internal Complaints Committee (ICC) has been constituted against sexual harassment in work-place. Management shall ensure that all investigations are conducted by the designated resource to ensure that prompt corrective action is taken where appropriate.

The committee shall comprise of the following members selected from the organization:

1. The Presiding officer (who shall be of the gender of the Complainant)
2. A minimum of one other member

Any proceeding of the committee will need a minimum of 3 member quorum.

6.0 Procedure

A. Informal Resolution Options :

When an incident of sexual harassment occurs, the person aggrieved of such conduct can communicate their disapproval and objections immediately to the harasser and request the

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harasser to behave decently.

If the harassment does not stop or if the person aggrieved is not comfortable with addressing the harasser directly, the person aggrieved or any person on behalf of such person aggrieved can bring their concern to the attention of the Complaints Committee for redressal of their grievances. The Complaints Committee will thereafter provide advice or extend support as requested and will undertake prompt investigation to resolve the matter.

B. Complaints:

An employee with a harassment concern, who is not comfortable with the informal resolution options or has exhausted such options, may make a personal complaint, giving the details of such harassment to the following email id: hr@crspcapital.com

6.1 The aggrieved person or the person making the complaint is required to disclose their names, departments, divisions and locations they are working in, to enable the Presiding Officer to contact them and take the matter forward. If the Presiding Officer of the Complaints Committee determines that the allegations constitute an act of sexual harassment, he/ she will proceed to investigate the allegation with the assistance of the Complaints Committee.

6.2 The aggrieved person shall also have the option of requesting to settle the matter between the aggrieved person and the respondent through conciliation and in case of such request, the Complaints Committee shall take steps to settle the matter between the aggrieved person and the respondent through conciliation; provided no monetary settlement shall be made as basis of conciliation. Where settlement has been arrived, the Complaints Committee shall record the settlement so arrived and forward the same to the Management to take action as specified in the recommendation.

6.3 On initiating investigation, the Complaints Committee shall send one copy of the complaint received from the aggrieved person to the respondent and may take any interim measures for purpose of justice;

6.4 The respondent shall file his/her reply to the complaint along with his/her list of

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documents, and names and addresses of witnesses, within a period not exceeding ten working days from the date of receipt of the complaint by the respondent;

6.5 The Complaints Committee shall make inquiry into the complaint in accordance with the principles of natural justice by giving a chance for each side to present their own case and to present their own witnesses and evidences.

6.6 The Complaints Committee shall have the right to terminate the inquiry proceedings or to give an ex-parte decision on the complaint by giving a notice of 15 days to the party concerned, if the complainant or respondent fails, without sufficient cause, to present herself or himself for three consecutive hearings convened by the Presiding Officer.

6.7 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 Complaint Committee;

6.8 Once the investigation is completed, and where the Complaints Committee arrives at the conclusion that the allegation against the respondent has been proved, it shall recommend appropriate action to the Management to take any disciplinary action in the form of:

- Warning
- Undergoing counseling session
- Written apology and bond of good behavior
- Debarring from supervisory/ managerial duties
- Excluding the employee from Promotion or Increment or payment of variable pay or all of the above.
- Suspension without salary
- Dismissal from the services
- Assisting the aggrieved in lodging FIR / Handing over the employee to Police
- Blacklisting of the employee

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- Any other punishment as may be warranted by the case

All concerned may be assured that the Committee and the Management will maintain the highest level of confidentiality in respect of all matters brought before it.

7.0. Action for False or Malicious Complaint of False Evidence

Where the Complaints Committee arrives at the conclusion that the allegation against the respondent is malicious or the aggrieved person or any other person making the complaint has made the complaint knowing it to be false or the aggrieved person or any other person making the complaint has produced any forged or misleading document, it may recommend to the Management, to take Disciplinary Action as per 6.8 above against such person initiating such malicious complaint and/or submitting false evidence.

8.0. Conflict of Interest

Termination process based on poor performance can be initiated if supported by periodical performance appraisals. Once the termination process is initiated, then employees irrespective of gender cannot raise sexual harassment concerns.

Similarly if an employee has raised sexual harassment concerns, then till the time, the concern is not resolved, his/her manager cannot initiate termination process on the basis of poor performance.

9.0 Knowing Your Rights

- ☐ You have the right to decide what you find offensive and to take action to stop unacceptable and unwelcome behaviour.
- ☐ If you believe a particular behaviour towards you should stop, tell the person exactly what you find offensive and make it clear that it is unwelcome (do not think the harassment will go away – your silence could be taken for tacit consent).
- ☐ If you find this difficult to do or if the behaviour continues, discuss the

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situation with HR or your manager.

- ☐ If the unwelcome behaviour continues or if you feel you have been unlawfully discriminated against or harassed, you can lodge a formal complaint. You should discuss what to do with your Manager or Human Resources as quickly as you can.
- ☐ Your complaint will be investigated with complete confidentiality and impartiality. We will take steps to ensure that you do not suffer retaliation or not are victimized because you complained.

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Annexure 1: Members of the Internal Complaints Committee at CRSP Capital Private Limited

NAME OF THE MEMBER	DESIGNATION	EMAIL ID
Seema Kothari	Director	info@crspcapital.com
Amit Babel	HR Head	hr@crspcapital.com
Thomas Mathew	Director	contact@crspcapital.com
Dushyant Singh Rathore	Director	ceo@crspcapital.com