



ALPHAGEO (INDIA) LIMITED

**POLICY FOR PREVENTION AND PROHIBITION OF SEXUAL HARASSMENT OF
WOMEN AT WORKPLACE**

Contents

Pg No.

Purpose	2
Definitions	2
Coverage	2
General Rules	2-3
Guidelines	3
Internal Complaints Committee	3
Process for Filing Complaint	4
Inquiry into Complaint	4
Interim Measures	5
Disciplinary Action	5
Appeal	5
Approving Authority	5

Purpose

Alphageo (India) Limited is an equal employment opportunity company and is committed to creating a healthy working environment that enables women employees to work without fear of prejudice, gender bias and sexual harassment. The Company also believes that all women employees have the right to be treated with dignity. Sexual harassment at the work place or other, that involving employees is a grave offence and is, therefore punishable. This Policy is in line and for effective implementation of "The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013" and the Rules made thereunder.

Definitions

"Employee" means all those women who are directly appointed by Alphageo (India) Limited (Alphageo) and will not include those employed on contract basis or through any service providers.

"Sexual Harassment" includes anyone or more of the following unwelcome acts or behavior (whether directly or by implication), namely:

- Physical contact and advances;
- A demand or request for sexual favours;
- Making sexually coloured remarks;
- Showing pornography
- Any other unwelcome physical, verbal or non-verbal conduct of sexual nature.
- The following Circumstances, among other circumstances, if occurs or is present in relation to or connected with any act or behavior of sexual harassment may amount to sexual harassment:
 - Implied or explicit promise of preferential treatment in her employment;
 - Implied or explicit threat of detrimental treatment in her employment;
 - Implied or explicit threat about her present or future employment status;
 - Interference with her work or creating an intimidating or offensive or hostile work environment for her;
 - Humiliating treatment likely to affect her health or safety.

Coverage

This policy is applicable to all employees of Alphageo including contract and vendor employees, trainees, consultants associated with the company, at work places wherever Women employees are employed or will be employed. At present this Policy covers Corporate Office and from time to time the Policy will be extended such work places as and when woman employees employed in those work places.

General Rules

- Alphageo as an employer constantly strives for the welfare of its women employees. Alphageo does not tolerate any kind of sexual, ethnic or social attribute-based harassment of its employees within the organization in any manner.

- Sexually offensive behavior can take many forms of unwelcome behavior. For example:
 - Visual: ogling, lewd gestures, sexually suggestive postures, leaving behind magazines with obscene photographs or write ups at the work place that can be seen by others etc.
 - Verbal: discussing sexual activities, repeated requests for dates, asking personal questions, making lewd comments, dirty jokes, whistling, cat calling etc.
 - Written: love notes, obscene cc: mail messages, dirty cartoons, filthy jokes etc.
 - Touching: "accidental collisions", patting, grabbing, kissing etc.

- The above instances are only illustrative and not exhaustive. In general, if an employee feels that she is being subject to sexual harassment that by itself will be sufficient for the organization to initiate appropriate action.

Guidelines

The following guidelines are provided for the better understanding of this policy.

Internal Complaints Committee

- An Internal Complaints Committee will be constituted at the respective workplaces, with one Presiding Officer / Chairperson and Not Less than Two Members from amongst employees and one member from amongst non-governmental organizations or associations committed to the cause of women with the issues relating to sexual harassment;

- Accordingly, an Internal Complaints Committee at Corporate Office is constituted with the following as members of the Committee.

S. No.	Name	Designation	Status	Email Id
1.	Mrs. Savita Alla	Joint Managing Director	Chairperson	Savita@alphageoindia.com
2.	Mr. Balaji Sundararajan	Sr. Vice President (Operations)	Member	balaji@alphageoindia.com
3.	Mrs. Kala Samineni	Sr. Administrative Officer	Member	kala.samineni@alphageoindia.com
4.	Mrs. Mridula Sankhyayan	NGO Member	NGO Member and External Advisor	Mridula@Vattvriksh.in

- The Company Secretary of the Company will act as a Secretary to the Committee who shall coordinate for conducting the meeting of the Committee.

- The Chairperson / Presiding Officer and Members of the Committee shall hold the Office for a period of Three (3) years from the date of nomination / appointment to the Committee.

- If any employee feels that she is being subjected to any kind of sexual harassment, then the same should be reported to the Internal Complaints Committee ("ICC").

- Any employee found guilty of sexual harassment shall be tried and awarded appropriate disciplinary action as the ICC deems fit.

Process for Filing Complaint

- Any aggrieved employee may make, in writing, a complaint of sexual harassment at workplace to the ICC 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 the last incident.
- The complaint should be in written form. The ICC will make the preliminary enquiry and in case of prima-facie evidence, case would be forwarded as a complaint by the ICC to the police within a period of seven days for registering the case under section 509 of the Indian Penal Code.
- Both the parties shall, during the course of inquiry, be given an opportunity of being heard and a copy of the findings shall be made available to both the parties enabling them to make representation against the findings before the committee.
- No employee will be retaliated against with respect to their employment with Alphageo for reporting harassment or for participating in a harassment investigation.

Inquiry into Complaint

- The Company is committed to resolving harassment issues promptly, thoroughly and impartially and with sensitivity to concerns for discretion and privacy.
- To the extent possible, investigations will be treated discreetly. Complete confidentiality cannot be guaranteed, since some disclosure may be necessary to conduct an appropriate investigation.
- For the purpose of making an inquiry, the ICC shall have the power to:
 - Summon and enforce the attendance of any person and examine him/her on oath
 - Require the discovery and production of documents
 - Any other matter which may be prescribed
- The Committee is required to complete the inquiry within a time period of 90 days.
- On completion of the inquiry, the ICC shall provide a report of its findings to the top management within 10 days from the date of completion of the inquiry and it will also be made available to the concerned parties.
- The management is mandated to take action on the report within 60 days.
- The ICC shall prepare an annual report every calendar year and submit it to the Management detailing number of complaints received, resolved and pending during the year, number of

cases pending for more than 90 days, nature of action taken on proved complaints and awareness programmes if any conducted during the year.

Interim Measures

- It may be necessary that interim measures be taken while a complaint is being resolved, investigated or decided. Such measures will be precautionary, not disciplinary.
- During the pendency of an enquiry, on a written request made by the aggrieved employee, the ICC may recommend the following to the management:
 - Transfer of aggrieved employee to any other workplace;
 - Grant leave to the aggrieved employee for a period of three months (The leave granted to the aggrieved employee shall be in addition the leave he/she would be otherwise entitled to);
 - May restrain the respondent from reporting on the work performance of the aggrieved woman or writing her confidential report and assign the same to another officer.

Disciplinary Action

- If an investigation of any allegation of sexual harassment shows that harassing behavior has taken place, the harasser will be subject to disciplinary action in accordance with the Code of Conduct policy, up to and including dismissal without notice.
- In case the complainant is found guilty of false accusation or misrepresenting information, the complainant will be subject to disciplinary action in accordance with the Code of Conduct policy, up to and including dismissal without notice.

Appeal

The parties to the dispute/case have the right to make an appeal in writing against the decision made by the ICC, to the management within 7 days of such decisions with reasons thereto. The ICC after going through the contents of the Appeal shall communicate the decision to the appellant through the HR representative.

Approving Authority

Any exceptions or deviations from this policy must be approved by the Managing Director / Board of Directors before such an exception or deviation is made. Any revision of this policy must also be approved by the senior management before it becomes effective. Any question of interpretation or applicability of any aspect of this policy will be settled by the in charge of the HR department.