



Policy on Prevention of Sexual Harassment at Workplace

OWNERS AND APPROVERS

Role	Name	Designation	Approval Date
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Approvers	Audit Committee	-	26 th August 2022
Approvers	Board of Directors	-	26 th August 2022

REVISION HISTORY

Version No.	Issue date	Date of revision	Change control no. for reference	Summary of changes (from previous version to this version)
01				NIL
02	01-Sep-21	01-Sep-2021		<ol style="list-style-type: none"> 1. Replace POSH with IC (Internal Committee) 2. Revised Policy to make it Gender Neutral 3. Minimum quorum required for Internal Committee. 4. Sub section - Appeal by any person aggrieved with the remedial/disciplinary actions by the committee. 5. Addition in section Non-disclosure of the identity and address of the aggrieved person, complainant, respondent and witnesses to the public in case matter becomes a part of public proceeding due to registration of complaint with police. 6. Assistance to aggrieved person in case of sexual harassment outside this Policy. 7. Added section - Protection against retaliation 8. Frequently asked questions (FAQs)

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DEFINITIONS

Term	Definition
Sexual harassment	Sexual harassment includes any one or more of the following unwelcome acts or behavior (whether directly or by implication) namely: a) physical contact and advances; or b) a demand or request for sexual favours; or c) making sexually colored remarks; or d) showing pornography; or e) any other unwelcome physical, verbal or non-verbal conduct of sexual nature.
Aggrieved woman	“Aggrieved woman” means a woman of any age whether employed or not, who alleges to have been subjected to any act of sexual harassment by the respondent.
Aggrieved man	“Aggrieved man” means a man of any age employed with the organization who is either on probation or permanent employee and or who is a trainee who is on the rolls of the organization who alleges to have been subjected to any act of sexual harassment by the respondent.
Complainant	Complainant means aggrieved woman or aggrieved man as defined above making complaint against sexual harassment.
Respondent	Respondent means a person against whom the complaint has been made by the complainant.
Workplace	Workplace includes BSV office premises, BSV sponsored or work-related activities outside BSV's office premises, or any place visited by the individuals covered under this Policy, arising out of or during employment/engagement with BSV. All work-related travel, off-site, trainings, retreats, client site visits, any social, business or other functions, etc. are covered by the Policy and fall within the definition of workplace. Workplace will involve primary place of work and extended workplace and will include work from home scenarios and conversations.
Internal Committee (IC)	“Internal Committee (IC)” means and includes an IC formed by BSV for redressal of complaints of sexual harassment in accordance with the procedure laid down in this Policy. Details of the names of the IC members are communicated to all the employees from time to time.
Management	“Management” includes Board of Directors, a person, or committee responsible for the formulation and administration of this Policy.
Presiding officer	“Presiding officer” means the presiding officer of the IC and is a woman employed at a senior level at the workplace from amongst the employees.
Circumstances of Sexual harassment	The following circumstances, among other circumstances, if occurring or present in relation to or connected with any act or behavior of sexual harassment amount to sexual harassment: i. implied or explicit promise of preferential treatment in employment, ii. implied or explicit threat of detrimental treatment in employment, iii. implied or explicit threat about present or future employment status, iv. interference with work or creating an intimidating, offensive, or hostile work environment or, v. humiliating treatment likely to affect an individual's health or safety.
Conciliation	“Conciliation” means the settlement of the issue after the complainant and respondent have undergone mediation in accordance with the law.
Hostile Work Environment	A hostile work environment arises when a man or a woman creates a work environment unsafe through 1. Verbal – includes sexual words and other sexual suggestive comments.

	<p>2. Non-Verbal – includes showing gestures or written offensive material and making offensive sounds and digital media conversations.</p> <p>3. Physical conduct - includes intentional touching of the body and inappropriate display of the body.</p> <p>which interferes with another person’s job performance or creates the workplace atmosphere, which is intimidating, hostile, offensive or humiliating. In other words among other circumstances, if it occurs or is present in relation to or connected with any of these acts like interference with a person’s work or creating an intimidating or offensive or hostile work environment for a person, or humiliating treatment likely to affect her/his health or safety will amount to sexual harassment.</p>
<p>Quid pro quo</p>	<p>Quid pro quo (Meaning “this for that”) refers to sexual favors ‘in exchange’ for employment related benefits like promotion, bonus, perquisites, increment, etc. Sexual harassment includes 'Quid pro quo' harassment when an individual's submission to unwelcome sexual conduct becomes an explicit or implicit condition of employment or when decisions such as promotion, transfer, compensation or discipline are determined on the basis of an individual's response to such conduct.</p>

BACKGROUND

BSV is committed to creating a safe and respectful working environment at all offices or business units that is free from any form of prejudice, harassment or any form of intimidation or discrimination or exploitation, regardless of gender, disability, marital status, age, race, color, sexual orientation, religion, geographic origin or any other perceived differences. The Company also believes that all employees have the right to be treated with dignity.

This Policy has been put in place to prohibit, prevent and deter any acts of sexual harassment, to lay down guidelines for reporting acts of sexual harassment at the workplace and to provide a procedure for dealing with cases of sexual harassment.

OBJECTIVES

BSV treats Sexual Harassment as gross misconduct under the service rules, Code of Conduct of BSV and other applicable laws and action will be initiated appropriately for such misconduct. It is necessary for employees to deal with their colleagues and third parties with full fairness, respect and dignity and realize that his/her behavior will be attributed to the Company and can affect its reputation.

This document and the guidelines will help to ensure practices are consistently followed to prevent occurrence of Sexual Harassment and procedure for redressal of complaints of Sexual Harassment at workplace.

Anyone violating this Policy will be subjected to disciplinary action.

SCOPE AND APPLICABILITY

This Policy applies to all the employees who are on the rolls of the company; it applies to probationers, permanent employees and to trainees (whether in the office premises or outside while on assignment).

This Policy will also apply to women who are covered by definition in “Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013”.

Where Sexual Harassment occurs to a women employee as a result of an act by a third party or outsider while on official duty, the Company will take all necessary and reasonable steps to assist her in terms of support and redressal or preventive action.

GOVERNING LAW

- The Prevention of Sexual Harassment Policy is published pursuant to the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and corresponding rules thereto (Notification no.18 published in the Gazette of India by the Ministry of Law and Justice on 23 April 2013. The law came into effect on 9 December 2013 vide notification no.2733 published by the Ministry of Woman and Child Development).
- Workplace sexual harassment is a form of gender discrimination which violates fundamental right to equality and right to life, and to live with dignity under Articles 14, 15 and 21 of the Constitution of India.

POLICY STATEMENT

- Sexual Harassment is strictly prohibited.
- BSV considers Sexual Harassment as a serious misconduct.
- BSV has zero-tolerance towards Sexual Harassment at workplace.
- In case of any incident of Sexual Harassment, investigation will be carried out and if found guilty strict action can be initiated, in accordance with the Policy.
- Retaliation is strictly prohibited.

INTERNAL COMMITTEE (IC)

- This IC is treated as an independent Committee and is not part of the BSV Management. However, for the purposes of smoother administration, the Committee routes the communications to Management through the Company's CHRO.
- Details of the members, including their names and contact information are displayed at notice board of all the locations and have been published in the BSV intranet web pages and updated on a periodic basis.
- If any member of IC is respondent or party to Sexual harassment complaint, such member is not involved in the proceedings, discussions or investigations by the IC.

REPORTING INCIDENTS OF SEXUAL HARASSEMENT

Filing a Complaint

- Any aggrieved person can file a complaint of Sexual Harassment, in writing to IC, within a period of 3 (three) months from the date of incident or in case of series of incidents, within a period of 3 (three) months from the date of last incident. In rare situations complaints can be taken by the IC after three months but within 6 months of the incident provided the complainant is able to give a valid and justified reason for such a delay in filing a complaint. However, it will be the IC, which will decide whether to accept or not accept such delayed complaints looking at the circumstances that prevented the aggrieved person from filing a complaint within the said first three- month period.
- The complaint can be filed before the immediate supervisor or Presiding Officer or any other member of IC through email with all details clearly mentioning name of the respondent and the complainant and contact details.
- If the case is filed with the immediate supervisor then it is necessary for the supervisor to forward the complaint to the Presiding Officer within one business day.
- The complaint can be sent to the email id POSH@bharatserums.com
- Once the Complainant makes a complaint it is necessary to keep the information about the complaint "Strictly Confidential".
- If the Complainant is unable to make a complaint in writing due to physical incapacity, then her friend, co-worker, or for any person who has a knowledge of the incident can file a complaint but after having a written consent of the complainant. You may contact IC member to know more about the process and procedure.
- If the Complainant is unable to make a complaint in writing due to any other reason like mentally incapacitated then relative or friend, a special educator can approach the presiding officer or any member of the IC who will help in understanding the options of filing a complaint.
- Retaliation, in any form, by any other person against either complainant or witness in such complaints tantamount to serious misdemeanor and strict disciplinary action will be initiated against such employee/s.

REDRESSAL OF THE COMPLAINT

Conciliation

- The IC may, before initiating an inquiry and at the request of the aggrieved woman take steps to settle the matter between the complainant and the respondent through conciliation, provided no monetary settlement is made as a basis of conciliation.
- Where there is a settlement arrived, IC will record the settlement and forward the same to the CHRO/Management, to take action as specified in the recommendation. Copies of the settlement will be given to the Complainant and the respondent. IC will conduct no further inquiry in this case.
- If the aggrieved woman informs the IC, that any term or condition of the settlement arrived has not been complied with by the respondent, the IC proceeds to make an inquiry into the complaint including forwarding the complaint to the police as the case may be. If the aggrieved man informs the IC about non-compliance of the settlement by the respondent, the IC will proceed to making an inquiry into the complaint.

Conducting and Concluding Inquiry

Consistent with the organization's obligation to conduct an investigation and take appropriate corrective action, complaint of Sexual Harassment will be treated immediately and fairly.

- In the event, the complainant or IC does not wish to initiate settlement through conciliation; the IC proceeds to make inquiry into the complaint against the respondent by IC.
- The Respondent will be informed that a complaint has been filed against him/her and no unfair acts of retaliation or unethical action will be tolerated. The IC will send one of the copies of the complaint received from the complainant to the respondent.
- The Respondent has to file his/her reply to the complaint along with the list of documents and names and addresses of witnesses, within a further period of 10 working days from the date he/she receives the complaint copy. The reply should be filed with the IC only.
- Both the Complainant and the Respondent initially will be questioned separately with a view to ascertain the authenticity of their contentions.
- IC will meet witnesses however, on their discretion, call upon or question any other person who they think may have knowledge of the incident or provide more relevant information.
- IC has the same powers as that of a Civil Court under the Code of Civil Procedure, 1908 and can:
 1. Summon and enforce the attendance of any person and examine him/her on oath.
 2. Ask for production of any document.
- The IC, where the respondent is an employee, proceed to make inquiry into the complaint in accordance with the provisions of the service rules applicable to the Respondent. In addition, the IC if the Aggrieved Women so desires and if prima facie case exists, assist and forward the complaint to the police, for registering the case under section 509 of the Indian Penal Code.
- The IC has the right to terminate the inquiry proceedings or to give an ex-parte decision on the complaint, if the Complainant or Respondent fails without sufficient reason to present the matter in 3 consecutive hearings convened for the said purpose. Such a decision will be taken after giving a notice in writing, (15) fifteen days in advance to the party(ies) concerned.
- During the pendency of an Inquiry, on a written request made by the Complainant, the IC in its sole discretion may recommend to the CHRO/Management the following:
 1. Transfer the Complainant or the Respondent to any other workplace or department.
 2. Restrain the Respondent from reporting on work performance of the Complainant or writing her/his confidential report and assign the same to another manager.
 3. Grant leave to the Aggrieved Woman up to a period of three months.

The IC will make such a recommendation after considering the necessity for taking such an action; if a prima facie case of Sexual Harassment exists; and if the medical condition of the Aggrieved Woman so requires, as certified by competent medical authority. It will also depend on the extent of damage it can cause and looking at severity of the incidence.

- Any person who appears as a witness before IC maintains the confidential nature of inquiry. In case, such a person is found to be divulging information to any other person, disciplinary action can be taken against the person.
- All proceedings conducted by IC are recorded, in writing, including the notices and minutes of meetings (MoMs) of all interactions.
- The Complainant, Respondent and witnesses sign the records of proceedings. Refusal to sign the records of the proceeding constitute misconduct and separate disciplinary action can be taken.
- If the complaint is against any IC member or senior management members of the Company, the said member recuses and will not be part of inquiry or decision making relating to the complaint.

Inquiry Report

- On the completion of inquiry, IC will provide a detailed report of its findings to the CHRO, for reporting to the management, within a period of 10 (ten) days from the date of completion of the inquiry. The report will have the following information:
 1. Complaint copy and response as received from the Respondent.
 2. Documented testimony of the Complainant and the Respondent.
 3. Evidence gathered/recorded.
 4. Findings of the Inquiry.
 5. Recommended action.
- Copies of final report are provided to the concerned parties.
- The IC, if after completing an inquiry arrives at the conclusion that the allegation against the Respondent has not been proved, it recommends to the Company that no action be taken in the matter.
- If the IC arrives at the conclusion that the allegations against the respondent have been proved it recommends to the CHRO:
 1. To take action for Sexual Harassment as misconduct in accordance with the provisions of the service rules applicable to the Respondent including dismissal. It can recommend to the Company, to take any action including a written apology, warning, reprimand, withholding of promotion, withholding of pay rise or increments, terminating the respondent from service without notice, be suspended with full forfeiture of salary and allowance by an order in writing or undergoing a counseling session or carrying out community service.
 2. To deduct from the Respondent's salary or wages that may be considered appropriate to be paid to the Aggrieved Woman or legal heirs as prescribed under the Law.

The employer can deduct from the salary of the respondent but if it is not able to do so due to absence from duty or cessation of employment it may direct to the Respondent to pay such sum to the aggrieved woman. In case the Respondent fails to pay the sum, the IC can forward the order for recovery of the sum as an arrear of land revenue to the concerned District Officer.

- The compensation to be paid to the aggrieved person can be a summation of following determinants:
 1. Mental trauma, pain, suffering and emotional distress caused to the Aggrieved Woman.
 2. Loss in career opportunity due to the incident of sexual harassment
 3. Medical expenses incurred by the aggrieved woman for physical or psychiatric treatment; and /or

4. Income and financial status of the Respondent.
- Upon receipt of the report, the employer will review the report and determine what action and follow-up needs to happen. Such a decision on the recommendations of the IC will be taken within (60) sixty days of receiving the report from IC.
 - If the investigation reveals that the Complainant has been sexually harassed as claimed, the Respondent will be disciplined accordingly and as prescribed by law.
 - Notwithstanding anything contained in the Right to Information Act 2005, the contents of the complaint made, identity, addresses of the Aggrieved Woman, Respondent and witnesses, any information relating to conciliation and inquiry proceeding, recommendations of the IC are not published, communicated or made known to the public.
 - Enquiry under this Policy will be preferably held at the location of the Complainant. Enquiry can be held through virtual meetings like video conferencing too.

Appeal

In accordance with the provision of Law, an appeal to the court or tribunal can be preferred by any person aggrieved with the remedial/disciplinary actions by the IC within (90) ninety days upon conclusion of inquiry

False or malicious complaints and false evidence

- This Policy has been evolved as a tool to ensure that in the interest of justice and fair play, our employees have a forum to approach in the event of instances of Sexual Harassment. However, if on inquiry by the IC it is revealed and concluded that the complaint was made with a malicious intent or the Complainant or any other person making the complaint has made the complaint knowing it to be false, forged or submitted misleading document with the motive of maligning the concerned individual / tarnishing her/his image in the organization and to settle personal/professional scores, it will recommend to the Company to take any action including a written apology, warning, reprimand, withholding of promotion, withholding of pay rise, terminating the respondent from service or undergoing a counseling session or carrying out community service.
- During the inquiry mere inability to substantiate a complaint or provide adequate proof may not attract action against the complainant.
- If in case the IC arrives at a conclusion that during the inquiry any witness has given false evidence or produced any forged or misleading document, it may recommend to the Company to take any action including a written apology, warning, reprimand, withholding of promotion, withholding of pay rise, terminating the person from service or undergoing a counseling session or carrying out community service.

PROHIBITION ON DISCLOSURE OF INFORMATION

- The identity and address of the aggrieved person, Complainant, Respondent and witnesses, any information relating to conciliation and inquiry proceedings, recommendations of IC and the action taken by the Management is not published, communicated or made known to the public, press and media in any manner.
- If the complaint has been registered with the police/under the IPC, the matter becomes a part of public proceedings. Any person having information of the complaint, inquiry or proceedings should not disclose the identity and address of the aggrieved person, Complainant, Respondent and witnesses to the public, press or the media in any manner.

HARASSMENT BY INDIVIDUALS OUTSIDE THIS POLICY

If an aggrieved woman raises an instance of sexual harassment to the IC where the respondent is not an employee or individual covered under this Policy, the CHRO/Management provide assistance to the woman, if she so chooses,

to lodge a complaint with the IC of the Respondent's Company or under the IPC or any other law for the time being in force, as appropriate.

PREVENTION OF SEXUAL HARASSMENT

BSV is committed to provide a safe working environment at all offices or business units. Basic psychological counselling is provided to the complainant, if required. There are a few things an employee can do to help translate the Policy into day-to-day practices and prevent such incidents from occurring.

- **FIRMLY SAY NO.** It is possible that the offender does not realize that his behavior is unacceptable to you. In case of any incidents /statements /jokes /emails, which you find sexually offensive, promptly speak directly and communicate that the offender's conduct is not acceptable to you. If in spite of the warning this behavior is repeated, kindly follow the process mentioned in this Policy.
- If you are unsure of the course of action to take in a given situation, we encourage you to approach the IC committee.
- Any concerns can be expressed, or reporting can be made without any fear of retaliation, harassment, intimidation, threats, coercion or discrimination.
- BSV cannot remedy sexual harassment or retaliation unless you bring these claims to the attention of IC. Failure to report claims of harassment and/or retaliation prevents us from taking steps to remedy the problem.

COMMUNICATION OF ISSUES

All queries regarding the Policy are addressed to the CHRO.

PROTECTION AGAINST RETALIATION

- The organization prohibits retaliation of any sort regardless of the outcome of the complaint against a person who has reported a concern, brought a complaint, cooperated in the inquiry of a complaint, or because a person is closely associated with an individual who has raised a complaint.
- Regardless of the outcome of the complaint made in good faith, the complainant and any person providing information or any witness, to be protected from any form of retaliation. While dealing with complaints of sexual harassment, the IC ensures that the complainant or the witness are not victimized or discriminated against by the respondent. Any unwarranted pressures, retaliatory or any other type of unethical behavior from the respondent against the complainant or witness are reported by the complainant to the IC as soon as possible. Disciplinary action, if required to be taken in relation to any such complaints.

AMENDMENTS AND WAIVER

The Company reserves the right to amend and/or alter this Policy at any time, in accordance with the applicable Laws. Any changes to the Policy are communicated to all employees.

FREQUENTLY ASKED QUESTIONS

Question	Answer
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Is IC located centrally / registered office only?	No, IC is located at all workplaces. Where the offices or administrative units of the workplace are located at different places or divisional or sub divisional level, the IC is located at all administrative units or offices.
How much time do I have to file a sexual harassment complaint?	The Indian Law allows the time limit of 3 months from the date of last incidence to file your complaint, however it is recommended that the aggrieved person files the complaint immediately. Law also permits a further time limit of 3 months should the IC be convinced about the reasons for the delay
Can verbal conduct amount to sexual harassment?	Verbal conduct that is sexually oriented can constitute sexual harassment. Words can be just as offensive as physical acts and contact. Sexually oriented jokes, comments and stories can be sexually harassing and can create a hostile work environment.
Can the time limit of 3 months be extended?	Yes, the IC can extend the time limit not exceeding another 3 months.
Can contents of complaint and inquiry proceedings be made public?	No, the identity and address of the aggrieved person, complainant, respondent and witnesses, any information relating to conciliation and inquiry proceedings, recommendations of IC and the action taken by the Management is not published, communicated or made known to the public, press and media in any manner.
What is the time limit of the appeal?	Appeal is done within a period of 90 (ninety) days.
Can both men and women be victims of sexual harassment?	Yes, both men and women can be victims of sexual harassment. No matter who is harassing whom, it is classified as sexual harassment if the harassment has sexual content. It is important to know that within BSV, regardless of gender, if employees feel they are harassed organization protects them
What is “Unwelcome” behavior? How do I know that my behavior is unwelcome?	Any behavior that is not welcome, not solicited, not wanted or not liked by another person because of sexual content in the behavior is Unwelcome Behavior. We can understand when our behavior is unwelcome, to others by watching the body language and verbal clues of the other person, facial expressions and response to our behavior. Our unwelcome behavior will receive uncomfortable looks with no eye contact and or a withdrawal feeling towards us.
What is not Sexual Harassment?	Any interaction, which is of sexual nature, has flirtation intent, attraction or friendship, which is invited; mutual, consensual and reciprocated is not sexual harassment.
Does this Indian Law only protect Women against Sexual Harassment at workplace?	Yes, there is a specific law called “The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act 2013, which is in force under which women are given protection against Sexual Harassment at Workplace. However, within our organization both men and women are protected against sexual harassment at workplace
The other day one of my female friend confided in me that she is being sexually harassed. Can I complaint on her behalf?	If you believe your friend has been sexually harassed you should encourage her to take it up with either her reporting manager or to the HR representative or to the employee members of the IC. The organization encourages the aggrieved women to give the complaint personally in writing, however if your friend is physically or mentally incapacitated then you may help her, contact the Employee Member of the IC to know how you can help
Is it Sexual Harassment if I ask one of my co-workers for a personal time out with him/her outside office (date)?	If you ask a co-worker for a personal time outside office (date) and the co-worker says she/he is not interested, don’t ask again. Repeated requests for a date may constitute sexual harassment, while one polite request probably will not.

<p>I am a Manager, and I am interested in dating one of my subordinates. Am I permitted to do so?</p>	<p>The organization does not feel appropriate to evaluate or otherwise supervise employees as regards with whom they may like to get involved. However, if the Manager and his subordinate want to start a relationship, they should inform the organization so that the reporting relationship can be changed to eliminate conflict of interest.</p>
<p>Everyone around me tells dirty jokes. I am the only one who is offended. Am I being too sensitive?</p>	<p>Everyone has a different tolerance for sexual chat. No one should tolerate behavior that makes him or her uncomfortable. The person who is uncomfortable should inform the offender that the behavior is unwelcome.</p>
<p>What if there are no witnesses to the unwelcome conduct? Will anyone believe me?</p>	<p>Victims of sexual harassment are often hesitant to come forward because they do not think they will be believed. This concern should not stop aggrieved person from making complaint known to the IC. Aggrieved person's allegations can often be substantiated even though there are no witnesses to the conduct. Investigations may take into consideration the credibility of each individual involved, admissions and previous complaints amongst others.</p>
<p>The other day, a fellow employee told me a joke that had mild sexual content. I wasn't offended by it, and we both found the joke to be funny. Our manager called both of us today, where he expressed that our conduct was inappropriate and a potential violation of the company's sexual harassment Policy. Was the joke harassment?</p>	<p>While one joke alone may not be harassment, it could become a part of a hostile environment. In this situation, you need to remember that the question is not whether you or the employee who told the joke was offended, but whether a "reasonable person" would find it offensive. The other point to remember is that someone must have found the joke offensive enough to report it, causing your manager to speak to you about this. This should be a warning that not everyone you work with shares your opinion as to what is or is not offensive. Take it as a sign that you need to be more careful with what you say at work.</p>
<p>If a co-worker or supervisor comments on my clothing or appearance, is that sexual harassment?</p>	<p>It depends on the nature of the comment. An innocuous compliment, such as "that's a nice dress," would not be harassment; but if it were followed up with a sexual reference (Verbal or non-verbal) then that type of behavior would be inappropriate. The key is whether the behavior, occurring because of the gender of the employee, creates a hostile or abusive work environment and is unwelcome.</p>
<p>I had an intimate relationship with a co-worker but broke it off. If that co-worker harasses me, can I still bring a claim for sexual harassment?</p>	<p>A sexual harassment claim is based on unwelcome conduct. If you have made it clear to your co-worker that you have no further romantic interest in him or her or have moved on, any unwelcome sexual attention that is severe or pervasive could be the basis for a harassment claim. You must make it very clear to your co-worker that the attention is unwelcome. If you do, your prior relationship will not excuse his or her harassment.</p>
<p>A regular customer of my employer makes offensive sexual remarks every time he visits the office and sees me. Is this sexual harassment?</p>	<p>It could be sexual harassment. The Organization's Policy protects you from sexual harassment by vendors, contractors, and third parties that you may encounter at your workplace. You should report the problem to your reporting manager and give your employer a chance to fix it (for example, making sure you don't have to deal with this customer etc.).</p>
<p>What could be possible examples of unwelcome behavior?</p>	<p>Examples of the kinds of conduct that may constitute sexual harassment because of unwelcomeness include, but are not limited to, the following:</p> <ul style="list-style-type: none"> ✓ Engaging in unwelcome sexual propositions, invitations, solicitations, and flirtation or ✓ Leering, staring at someone, or looking at someone with "elevator eyes" (i.e.

	<p>looking someone up and down);</p> <ul style="list-style-type: none"> ✓ Using unwelcome sexually degrading language, sexual jokes, innuendos, or gestures or ✓ Displaying sexually suggestive objects, pictures, videotapes, graffiti and/or visuals that are not germane to any business or academic purpose or ✓ Displaying or transmitting sexually suggestive electronic content, including inappropriate e-mails or ✓ Making unnecessary and unwanted physical contact, such as hugging, rubbing, touching, patting or pinching or ✓ Inappropriate commenting on a person's body, dress, appearance, gender, sexual relationships, or ✓ Repeatedly asking someone for a date or a meal after the person has expressed disinterest. ✓ Intentionally blocking a person's path.
<p>What should I do if I have been sexually harassed?</p>	<p>As an individual you have few options to choose from. In some situations, individuals who are experiencing unwelcome behavior feel comfortable approaching the individual who is causing the problem and letting him or her know that the conduct is inappropriate and must stop. Sometimes, individuals are not aware that their behavior is offensive, and quickly apologize and change their behavior once they are aware that their conduct is unwelcome. However, you are not required or expected to confront your harasser prior to reporting unwelcome behavior. You may choose to complain against the respondent if you are harassed. Read the Policy to understand the process of making a complaint.</p>
<p>What if I am sexually harassed by a co-worker but outside the office?</p>	<p>It depends. If you and the co-worker are outside the office together for work or business and the harassment occurs, then the complaint made will be addressed otherwise it may be difficult for the organization to take up the complaint.</p>
<p>Will my complaint be treated confidentially?</p>	<p>While the organization cannot promise complete confidentiality in its handling of harassment complaints, it will make every reasonable effort to handle inquiries, complaints and related proceedings in a manner that protects the privacy of all parties. Each complaint will be resolved as discreetly as possible, with information shared with those who need to know. Complaints will require the disclosure of the aggrieved person's identity to the respondent in order to fully investigate the matter and/or to enable the respondent to fully respond to the allegations against him or her. In its investigation, the organization will be sensitive to the feelings and situation of both the parties of sexual harassment. Also, it is necessary that the complainant and the respondent keep the complaint confidential.</p>
<p>How does the organization handle false allegations of Sexual harassment?</p>	<p>A false allegation occurs when someone intentionally reports information or incidents knowing it to be untrue. Failure to prove a claim of harassment is not equivalent to a false allegation. Strict Disciplinary Actions will be taken on individuals who knowingly make false allegations of sexual harassment.</p>
<p>What happens if the aggrieved person misconstrues a</p>	<p>It is important to note that issues of sexual harassment do not look at intentions of the respondent. The perception and impact an unwelcome</p>

behavior as sexual harassment?	behavior are making on the recipient is examined or considered during investigation.
What rights do I have if I am accused of sexual harassment?	Individuals accused of sexual harassment have due process rights and an opportunity to be heard.