Prevention of Sexual Harassment

Deepastambha Charitable Trust| Last updated: 01/04/2026

In accordance to "The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013"

1. Commitment

This policy has been framed in accordance with the provisions of "The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013" and rules framed thereunder (hereinafter "the Act") accordingly. While the policy covers all the key aspects of the Act, for any further clarification reference shall always be made to the Act and the provisions of the Act shall prevail.

Deepastambha Charitable Trust (hereinafter "DCT") was founded in year 2008 with a thought of changing perspectives of people from complaining to cooperation and an aim to promote volunteerism. Our willingness and devotion to bring upon this change is what brought all the volunteers together. Our success is based on our people. We treat each other with respect and dignity and expect everyone to promote a sense of personal responsibility. We associate with competent and motivated people who respect our values, provide equal opportunities to explore everyone's ideas social betterment and advancement; protect their identity and do not tolerate any form of harassment or discrimination.

Through this gender-neutral policy, DCT is committed to provide an environment that ensures all employees, stakeholders and volunteers, irrespective of their gender, are treated with dignity and respect and afforded equitable treatment. The organisation is also committed to promoting an environment that is conducive to the social betterment through a platform to explore various innovative ideas from its volunteers and encourages equality of opportunity for everyone involved.

DCT will not tolerate any form of sexual harassment and is committed to take all necessary steps to ensure that its employees, volunteers and stakeholders are not subjected to any form of harassment.

2. Scope

DCT aims to adopt zero tolerance attitudes against any kind of Sexual Harassment or discrimination caused by any employee, volunteer or stakeholders during their association with DCT towards any other person being a volunteer with DCT, employee, associate, vendor and any other stakeholder in organisation's Pune and Nashik branch premises or elsewhere in India or abroad.

This policy applies to all categories of employees of the organisation, including permanent management and workmen, temporaries, trainees and employees on contract at its workplace or at activity locations. It also applies to any

personnel at a workplace for any work on regular, temporary, ad hoc or daily wage basis, either directly or through an agent, including a contractor, with or, without the knowledge of the principal employer, whether for remuneration or not, or working on a voluntary basis or otherwise, whether the terms of employment are express or implied and includes a co-worker, a contract worker, probationer, trainee, apprentice or called by any other such name. The organisation will not tolerate sexual harassment, if engaged in by suppliers or any other associates.

The workplace includes:

- All offices or other premises where the organisation's work and/or activities/projects/programmes are conducted.
- All DCT-related activities performed at any other site away from the DCT's premises.
- Any social or other functions where the conduct or comments may have an adverse impact on the workplace, workplace relations or volunteering relations.

3. Applicability

All employees, volunteers, stakeholders and associates of DCT at all locations

4. Definition of Sexual Harassment

Sexual Harassment includes such unwelcome sexually determined behaviour, as physical contacts and advances, sexually coloured remarks, showing pornography and sexual demands whether by words, gestures or actions. Such conduct can be humiliating and may constitute a health and safety problem. It is discriminatory when the complainant has reasonable grounds to believe that his or her objection would disadvantage them in connection with employment, including recruiting or promotion or when it creates a hostile working environment. Sexual harassment includes such unwelcome sexually determined behaviour (whether directly or by implication) as:

- Physical contact and advances;
- A demand or request for sexual favors;
- Sexually coloured remarks;
- Showing pornography;
- Unwelcome sexual advances involving verbal, non-verbal, or physical conduct such as sexually coloured remarks, jokes, letters, phone calls, e-mail, gestures, showing of pornography, lurid stares, physical contact or molestation, stalking, sounds, display of pictures, signs, verbal or non-verbal communication which offends the individuals sensibilities and affect her/his performance.
- Eve teasing, innuendos and taunts, physical confinement against one's will and likely to intrude upon one's privacy;
- Act or conduct by a person in authority which creates the environment at workplace hostile or intimidating to a person belonging to the other sex;

- Conduct of such an act at work place or outside in relation to an employee, volunteer or associate of DCT or vice versa during the course of employment, volunteerism or association; and
- Any unwelcome gesture by an employee, volunteer or associate having sexual overtones.
- Sexual harassment is emotionally abusive and creates an unhealthy, unproductive atmosphere at the workplace. Sexual harassment cases can be classified into two categories: - quid pro quo and creation of a hostile working environment.
- Under the quid pro quo (meaning - this for that) form of harassment, a person or authority, usually the superior of the victim, demands sexual favors for getting or keeping a job benefit and threatens to fire the employee if the conditions are not met.
- A hostile work environment arises when a co-worker or supervisor creates a work environment through verbal or physical conduct that interferes with another co-worker's performance or creates the workplace atmosphere which is intimidating, hostile, offensive or humiliating and experienced as an attack on

  personal dignity. For example: a volunteer tells offensive jokes. No person shall indulge or caused to be indulged under instructions from superior in sexual harassment of co-workers, co-volunteers, associates or stakeholders. However, a person who is sexually harassed can complain about the same even if there is no adverse work consequence.

5. Complaint Process

Whether or not such conduct constitutes an offence under law and a breach of the employment rules, an appropriate complaint mechanism in the form of "Complaints Committee" has been created in the organisation for time-bound redressal of the complaint made by the complainant.

DCT will ensure that any Complainant will not suffer adverse consequences as a result of any complaint being made.

Complaints Committee:

The Organisation has formed an Internal Complaints Committee for redressal of harassment complaints and for ensuring time bound treatment and resolution of such complaints.

The Internal Complaints Committee will comprise of the following four members:

- Chairperson (Presiding Officer) – Woman
- Member - Employee/Volunteer
- Member – Employee/Volunteer

- Member – a person from ngo / social worker / person having knowledge of sexual harassment issues eg. Advocate. (To be appointed by the person nominated by the Board for the purpose)

Note:

- No meeting of the ICC can be held without at least 3/4 members present including the external member.
- No member shall be part of ICC for more than a period of 2 years. The only exception of extension in any member's tenure would be in case of an on-going investigation.

Current nominated members of the committees are given in Point 11

The Internal Complaints Committee is responsible for:

- Receiving complaints of sexual harassment
- Initiating and conducting inquiry as per the established procedure
- Submitting findings and recommendations of inquiries
- Coordinating with the president and/or trustees of DCT in implementing appropriate action
- Maintaining strict confidentiality throughout the process as per established guidelines
- Submitting annual reports in the prescribed format

Procedures For Resolution, Settlement of Acts of Harassment:

The organisation is committed to providing a supportive environment in which to resolve concerns of harassment as under:

<u>Informal Resolution Options:</u>

When an incident of harassment occurs, the victim of such conduct can communicate her/his disapproval and objections immediately to the harasser and request the harasser to desist from such conduct in the future.

If the harassment does not stop or if the victim is not comfortable with addressing the harasser directly, she/ he can bring the concern to the attention of the Complaints Committee for redressal of grievances.

The Complaints Committee will thereafter provide advice or extend support as requested and will do the needful to resolve the matter.

It is advisable that the victim keeps a record of incident i.e. date, place, possible witness and file a complaint as soon as possible.

Procedure for complaints in occurrence of sexual harassment:

- Any DCT employee/volunteer/stakeholder or associate with a harassment concern, who is not comfortable with the informal resolution option or has exhausted such option, may make a formal complaint to the Chairperson or any member of the Internal Complaints Committee. The victim should make a complaint within three months from the date of occurrence of the event or in a case of series of incidents, within a period of three months from the date of the last occurrence.
- The complaint should be submitted in writing for it to be considered as formal and for the committee to probe and take the necessary actions. The victim may submit the complaint in the form of a written letter, duly signed by the victim and submitted in a sealed envelope to the Chairperson/Member of Internal Complaints Committee. Alternatively, the victim may also send in a written communication through email to the Chairperson/Member of Internal Complaints Committee. The victim should disclose their name, department, date of occurrence, place of occurrence in the complaint letter.
- If any complaints are received by any of the Members of the Internal Complaints Committee, the member is obliged to bring it to the notice of the Chairperson within three working days from the receipt of the complaint.
- The Internal Complaints Committee should meet within 7 working days from the date of receipt of the complaint by the Chairperson to decide on the proceedings and the course of investigation.
- A quorum of 3 members is required to be present for the proceedings to take place. The quorum shall include the Chairperson and at least two members, one of whom shall be a lady.
- Once the complaint is received by the Internal Complaints Committee, the alleged accused should be informed regarding the complaint. It should also be made clear that no act of retaliation or unethical action by the accused shall be tolerated and that the accused should extend full support during the investigation of the case.
- The Internal Complaints Committee shall ensure that a fair and just investigation is undertaken immediately.
- Both the victim and the alleged accused will be questioned separately by the Internal Complaints Committee with a view to ascertain the authenticity of their contentions.
- Witnesses named if any, shall also be questioned separately.
- The victim and the accused shall be informed of the outcome of the investigation. The investigation shall be completed within 90 days of the receipt of the complaint. If the investigation reveals that the victim has been sexually harassed as claimed, the accused will be disciplined accordingly. Disciplinary action may include any of the following:
    - Counselling
    - Warning

- Written apology from offender
- Bond of good behaviour
- Debarring from project management duties
- Cancellation of specific work Assignment
- Dismissal as a volunteer
- Police Complaint

- In case the complaint is found to be false, the Complainant shall, if deemed fit, be liable for appropriate disciplinary action by the Internal Complaints Committee. The final decision shall be communicated to the victim and the alleged harasser.
- Any party not satisfied or further aggrieved by the implementation or non-implementation of recommendations made, may appeal to the appellate authority in accordance with the Act and rules, within 90 days of the recommendations being communicated.

Confidentiality

The organisation understands that it is difficult for the victim to come forward with a complaint of sexual harassment and recognizes the victim's interest in keeping the matter confidential. To protect the interests of the victim, the accused person and others who may report incidents of sexual harassment, confidentiality will be maintained throughout any investigatory process to the extent practicable and appropriate under the circumstances.

6. Access to reports and documents

All records of complaints, including contents of meetings, results of investigations and other relevant material will be kept confidential by the Organisation except where disclosure is required under disciplinary or other remedial processes.

7. Protection to complainant/victim

The organisation is committed to ensuring that no employee, volunteer, associate or stakeholder who brings forward a harassment concern is subject to any form of reprisal. Any reprisal will be subject to disciplinary action. The organisation will ensure that victim or witnesses are not victimized or discriminated against while dealing with complaints of sexual harassment. However, anyone who abuses the procedure (for example, by maliciously putting an allegation knowing it to be untrue) will be subject to disciplinary action.

8. Complaints made with a malicious intent

This policy has been evolved as a tool to ensure that in the interest of justice and fair play, our employees, volunteers, associates or stakeholders have a forum to approach in the event of instances of sexual harassment. However, if on

investigation it is revealed that the complaint was made with a malicious intent and with the motive of maligning the concerned individual / tarnishing his/her image in the organisation and to settle personal/professional scores, strict action will be taken against the complainant.

The Committee may also take suo moto action, if any incident of harassment is brought to its attention, without any formal complaint being made in this regard.

9. Responsibility of employees, volunteers, stakeholders and associates regarding sexual harassment

All employees, volunteers, stakeholders and associates of the organisation have a personal responsibility to ensure that their behavior is not contrary to this policy. This policy is deemed to be a part of the terms of employment of every DCT employee. All employees are encouraged to reinforce the maintenance of a work environment free from sexual harassment.

10. Conclusion

In conclusion, the Company reiterates its commitment to providing its employees, a workplace free from harassment/ discrimination and where every employee is treated with dignity and respect.

11. Internal Complaints Committee

Chairperson: Dr. Anushka Shembekar

Member:

1. Ms. Aditi Deshpande
2. Mr. Anand Bangale

External Member: Mr. Sandesh Deo

Email: contactus@deepastambha.com

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