

## 1. OBJECTIVES:

- (a) Further to and in accordance with the provisions of the Sexual Harassment of employees at Workplace (Prevention, Prohibition and Redressal) Act, 2013, and the rules made thereunder, both, as amended from time to time ("Act"), this policy against sexual harassment ("Policy") is designed to provide:
- (i) protection to employees against Sexual Harassment (*as defined below*) in the workplace;
  - (ii) for the prohibition of Sexual Harassment in the work place;
  - (iii) for the prevention of Sexual Harassment in the work place; and
  - (iv) a mechanism for redressal of complaints relating to Sexual Harassment.
- (b) All employees are requested to read this Policy carefully and contact the Internal Complaints Committee in case of any issues, concerns, complaints etc. in this regard.

## 2. SCOPE:

The Policy applies to all employees in CAM Industrial Services, Goa working across any and all locations in Goa ("CIS").

## 3. DEFINITION & INTERPRETATION:

- (a) **Sexual Harassment** for the purpose of the Policy, includes any one or more of the following unwelcome acts or behavior (whether directly or by implication) namely:
- (i) physical contact and advances; or
  - (ii) a demand or request for sexual favours; or
  - (iii) making sexually coloured remarks or jokes; or
  - (iv) showing pornography; or
  - (v) any other unwelcome physical, verbal or non-verbal conduct of sexual nature, whether committed in person or some other way (e.g., via email, text message, phone calls, etc.).
- (b) Without prejudice to the above definition, the following circumstances, among other circumstances, if any one or more occur or is present in relation to, or connected with any act or behavior of Sexual Harassment, may amount to Sexual Harassment:
- (i) implied or explicit promise of preferential treatment in employment; or
  - (ii) implied or explicit threat of detrimental treatment in employment; or
  - (iii) implied or explicit threat about present or future employment status; or
  - (iv) interference with work or creating an intimidating or offensive or hostile work environment; or
  - (v) humiliating treatment likely to affect health or safety.
- (c) For the purpose of this Policy, employees shall mean all employees of CAM Industrial Services including all trainees, probationers, apprentice, confirmed; permanent, temporary, casual and contract employees and any other employee called by any other such name. This Policy also applies to work-related settings and activities outside the workplace.

- (d) Terms used but not defined in this Policy shall have the same meaning as prescribed under the Act. This Policy and the Act shall be interpreted harmoniously and if the provisions of this Policy cannot be interpreted harmoniously with the Act or vice-versa on account of inconsistencies or ambiguities then the provisions of the Act shall prevail over this Policy.

**(4) PROHIBITION:**

No employee shall be subjected to any Sexual Harassment at CAM Industrial Services.

**(5) INTERNAL COMPLAINTS COMMITTEE:**

Constitution:

The Internal Complaints Committee shall be constituted with not less than four members to deal with complaints of Sexual harassment at the workplace. Out of four members of the Committee, one member shall either be from amongst an NGO or an external legal expert, familiar with the issues relating Sexual harassment. Senior women employees shall be nominated as Presiding officer of the ICC. If the complaint is against an Internal Complaint committee member, such member shall be removed from the ICC. There will also be one General Secretary of the Committee to look after administrative work of the ICC. A minimum of 3 members shall form the quorum to conduct any investigation. No IC meetings and investigations shall be carried out without the presence of the external member.

**Composition of the Committee:**

Member 1: Presiding Officer (Senior Woman Associate)

Member 2: General Secretary

Member 3: Committee Meeting Manager

Member 4: NGO/Lawyer with knowledge about this subject

- (a) The Internal Complaints Committee for the purpose of this Policy shall be constituted in accordance with the below for each CAM Industrial Services location:

Presiding Officer – A senior female employee;

Members – 2 employees.

½ of the total members shall be women.

The name and contact information of the individuals comprising the Internal Complaints Committee shall be notified to all employees subsequent to the issuance of this Policy.

The Presiding Officer and every member of the above-mentioned Internal Complaints Committee shall hold office for a period of 2 years from the date of their nomination as may be specified by CAM Industrial Services.

- (b) The management shall be free either to remove the Presiding Officer or any member at any time for reasons to be recorded in writing, and promptly in accordance with the provisions of the Act, nominate a new Presiding Officer / member which will constitute the Internal Complaints Committee.
- (c) The Presiding Officer / members may voluntarily resign from the Internal Complaints Committee, in which case the management will promptly in accordance with the provisions of the Act, nominate a new Presiding Officer / members which will constitute the Internal Complaints Committee.

- (d) In such locations where the Internal Complaints Committee cannot be formed on account of there not being enough individuals to form the said committee as per (a) above, the Internal Complaints Committee to be contacted shall be the same, details of which shall be notified to such CIS location.

**(6) COMPLAINTS:**

- (a) Any aggrieved employee may make a complaint of Sexual Harassment in writing to the Internal Complaints Committee, within a period of 3 months from the date of the incident and in case of a series of incidents, within a period of 3 months from the date of the last incident. In case the said complaint cannot be made:
  - (i) in writing, the employee may approach the Internal Complaints Committee who shall render to it all reasonable assistance in this regard; or
  - (ii) within the above specified time period, then the Internal Complaints Committee may extend the time limit not exceeding 3 months, if it satisfied that the circumstances were such which prevented the aggrieved employee from filing a complaint with the said period.
- (b) Any employee having knowledge of Sexual Harassment also has the responsibility to report the same in writing to the Internal Complaints Committee within 3month from the time he / she gets to know of such Sexual Harassment.
- (c) Upon receiving any complaint under this Policy, the Internal Complaints Committee shall be responsible for conducting an inquiry in terms of and within the time limits prescribed in the Act.

- (d) The Internal Complaints Committee may, before initiating the inquiry and at the request of the aggrieved employee take steps to settle the matter between him/her and the accused through conciliation. Where a settlement is arrived at pursuant to such conciliation, no further inquiry shall be conducted by the Internal Complaints Committee. Provided further that no monetary settlement shall be made as a basis of such conciliation. The Internal Committee shall provide copies of such settlement to the aggrieved employee and the accused.

If the aggrieved employee informs the Internal Complaints Committee that any condition of such settlement has not been complied with by the accused, the Internal Committee shall proceed to conduct an inquiry into the complaint or forward the same to the police.

- (e) During the pendency of the inquiry, on a written request from the aggrieved employee, the Internal Complaints Committee may recommend to the management to:
- (i) transfer the employee or the accused to any other workplace;
  - (ii) grant leave to the aggrieved employee while the inquiry is on-going upto a period of 3 months; or
  - (iii) grant such other relief to the aggrieved employee as may be prescribed.

Pursuant to the above, the leave, if granted, shall be in addition to the leave the employee is otherwise entitled to.

- (f) Within 10 days from the completion of an inquiry conducted under this Policy, the Internal Complaints Committee shall provide a report of its findings to the management and such report shall be made available to the concerned parties.

- (g) Where the Internal Complaints Committee, pursuant to an inquiry conducted in accordance with the provisions of the Act, arrives at the conclusion that the allegation of Sexual Harassment against the accused has been proved, it shall recommend to the management the action to be taken against the accused as appropriate and in accordance with the provisions of the Act.
- (h) Where the Internal Complaints Committee, pursuant to an inquiry conducted in accordance with the provisions of the Act, arrives at the conclusion that the allegation against the accused is malicious or the aggrieved employee or any other person making the complaint has made the complaint knowing it is false, or the aggrieved employee or any other person making the complaint has produced any forged or misleading document, it may recommend to the management to take appropriate action against the employee or the person who has made the complaint. However, mere inability to substantiate a complaint or provide adequate proof need not attract action against the complainant. And, malicious intent on the part of the complainant shall only be established after proper inquiry by the Internal Complaints Committee in accordance with the Act has been conducted and before any action is recommended.
- (i) Where the Act so requires, details of the inquiry/complaint shall be reported to the police by the Internal Complaints Committee for the purpose of registering a complaint under Section 509 of the Indian Penal Code and any other relevant provisions of the Code where applicable.

**(7) CONFIDENTIALITY:**

Notwithstanding anything contained in the Right to Information Act, 2005, the contents of the complaint, the identity and address of the employee, accused and witnesses, any information relating to the conciliation and inquiry proceedings, recommendations of the Internal Complaints Committee and the actions taken by

CAM Industrial Services shall not be published, communicated or made known to the public, press or the media in any manner.

Further, the Internal Complaints Committee and the management will keep confidential the above information, and only disclose this information to such individuals within CAM Industrial Services who have a genuine need to know of the same for the purpose of conducting/assistance in the inquiry.

**(8) NON-RETALIATION**

CAM Industrial Services will not tolerate retaliation in any form against employees for raising concerns or making good faith complaints, reports etc. under this Policy. All employees are encouraged to speak-up and report any actions that could potentially harm our employees and have the potential of becoming violations of this Policy.

Retaliation in any form will be dealt with seriously and appropriate action will be taken against the employee retaliating.

**General Provisions:**

- A. A copy of the details of the Internal Complaint Committee will be kept displayed on the notice board of Establishment at a conspicuous place along with the penal consequence of Sexual Harassment.
- B. The object of awareness among associates may also be achieved by way of publication of the policy in local language of the establishment or in any other manner including circulations, training etc;
- C. The management shall take all necessary and reasonable steps to prevent and ensure that no Employee is subjected to sexual harassment in the Workplace by any third party and where any such Sexual Harassment occurs, the Management shall take all necessary and reasonable steps to assist the Aggrieved Woman/man to redress the act of sexual Harassment;
- D. The Internal Complaint Committee and the Management for the implementation of this policy will recognize that confidentiality is



important and will respect the confidentiality and privacy of aggrieved Employee or Respondent, to the extent reasonably possible;

- E. The company shall assist in securing the attendance of respondent and witnesses before the Internal complaint committee;
- F. This policy, made for dealing with matters of sexual Harassment will continue to apply and shall be liable to be amended with change in law and Company policy.

**APPEAL:**

An Aggrieved Employee aggrieved by from the recommendations of the Internal Complaints Committee or in case of noncompliance of the recommendations may prefer an appeal to the appropriate authority, as notified from time to time, within a period of 90days of the recommendations.

**APPLICABLE LAW:**

This policy is subject to the provisions of The Sexual Harassment of women at the Workplace (Prevention, Prohibition and Redressal Act 2013), the rules made thereunder and other laws in force.

**Submission of Reports:** The General Secretary of the Internal Complaints Committee shall submit quarterly as well as an annual report to the management and respective authorities as prescribed in the Act. The Internal Complaints Committee should prepare an annual report on Sexual harassment cases to be submitted to the appropriate government authorities as and when requested for.

**POLICY STATUS:**

<b>Effective Date: 03 January 2024</b>	<b>Review Date: 15 December 2023</b>
<b>Prepared By: Kajol Mangueshkar</b>	<b>Approved By: Managing Partner</b>

### Details of the Internal Complaints Committee of CAM Industrial Services

Sr.No.	Name	Designation	ICC Role	Email ID	Mobile
1	Ms. Sweta Jaywant chari	Administrative Head	Presiding Officer	admin@cam-goa.com	8380078846
2	Adv.Kajol Mangueshkar	External Member		kajolmangueshkar2904@gmail.com	8411997221
3	Mr.Soham Madhav Prabhu	CEO	Secretary	ceo.ewaste@cam-goa.com	7798001629
4	Ms.Nishita Narayan Sakhalkar	Human Resource Assistant	Member	hr@cam-goa.com	8390039529

