



SEXUAL HARASSMENT POLICY

INTRODUCTION

CAMPUS ACTIVEWEAR LIMITED (hereinafter referred as 'Campus' or 'Employer' or 'the Company') is committed for providing a safe work environment for all its employees free from discrimination on any ground and from harassment at work including sexual harassment and it ensures that every employee is treated with dignity and respect and accorded equitable treatment.

Campus in compliance with the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (herein after referred as 'the Act') including rules enacted thereunder, to the extent applicable, has framed a policy for prevention of Sexual Harassment at workplace.

Campus will operate a zero tolerance policy for any form of sexual harassment in the workplace, treat all incidents seriously and promptly investigate all allegations of sexual harassment. Any person found to have sexually harassed another will face disciplinary action, up to and including dismissal from employment. All complaints of sexual harassment will be taken seriously and treated with respect and in confidence. No one will be victimised for making such a complaint.

APPLICABILITY

This policy is gender neutral and applies to all categories of employees of Campus including employees working on regular, temporary, ad hoc or daily wage basis, either directly or through an agent, including a contractor, 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.

DEFINITIONS:

1. **"Sexual Harassment"** 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
 - (iv) showing pornography; or
 - (v) any other unwelcome physical, verbal or non-verbal conduct of sexual nature;

The following circumstances, among other circumstances, if it occurs, 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 his/her employment; or
- (ii) implied or explicit threat of detrimental treatment in his/ her employment; or
- (iii) implied or explicit threat about his/her present or future employment status; or
- (iv) interference with his/her work or creating an intimidating or offensive or hostile work environment for his/her; or

(v) humiliating treatment likely to affect his/her health or safety.

2. **“Workplace”** includes all offices or other premises where the Company’s business is conducted and any place visited by the employee arising out of or during the course of employment, including transportation provided by the employer for undertaking such a journey.”

CONSTITUTION OF INTERNAL COMPLAINTS COMMITTEE (ICC)

The Internal Complaints Committee (hereinafter referred as **‘Committee’**) shall at least consist of the following members to be nominated by the employer, namely: —

- (a) a **Presiding Officer** who shall be a woman employed at a senior level at workplace from amongst the employees;
- (b) not less than **two Members** from amongst employees preferably committed to the cause of women or who have had experience in social work or have legal knowledge;
- (c) **one member** from amongst non-governmental organisations or associations committed to the cause of women or a person familiar with the issues relating to sexual harassment.

Provided that, at least one-half of the total members so nominated shall be woman.

The Presiding Officer and every Member of the Committee shall hold office for such period, not exceeding three years, from the date of their nomination as may be specified by the employer.

The composition is subject to modification(s) or reorganization as and when the same is required under the applicable laws.

The Committee is responsible for:

- Investigating every formal complaint of sexual harassment
- Taking appropriate remedial measures to respond to any substantiated allegations of sexual harassment.
- Discouraging and preventing employment-related sexual harassment.

PROCEDURES FOR RESOLUTION, SETTLEMENT OR PROSECUTION OF ACTS OF SEXUAL HARASSMENT

Campus is committed to providing a supportive environment to resolve concerns of sexual harassment as under:

A. Informal Resolution Options

When an incident of sexual harassment occurs, the victim of such conduct can communicate their disapproval and objections immediately to the harasser and request the harasser to behave decently.

If the harassment does not stop or if victim is not comfortable with addressing the harasser directly, the victim can bring their concern to the attention of the Internal Complaint Committee

for redressal of their grievances. The Committee will thereafter provide advice or extend support as requested and will undertake prompt investigation to resolve the matter.

B. Complaints

1. An aggrieved person, who is not comfortable with the informal resolution options or has exhausted such options, may report the same to any member of Internal Complaints Committee or make a formal complaint and file seven copies of the same to the Internal Complaints Committee (in a sealed envelope) within a period of 3 months from the date of incident and in case of series of incidents within a period of 3 months from the date of last incident along with the necessary details. The aggrieved person is required to disclose his/her name, department, division and location he/she is working in.
2. If the Complaint cannot be made in writing, the Presiding Officer or any member of Internal Complaints Committee, shall render all reasonable assistance to the aggrieved person for making the written complaint.
3. In the event the complaint is against:
 - a. Any member of the Internal Complaints Committee; or
 - b. Any relative(s) of any of the members of the Internal Complaints Committee

Then such member shall cease to be a member of the Internal Complaints Committee for the purposes of dealing with that particular Complaint. Campus may nominate a new member for dealing with that particular Complaint.

C. Conciliation

The ICC may before initiating an enquiry into the alleged complaint and at the request of the aggrieved person take steps to settle the matter between the aggrieved person and the respondent through conciliation. Where a settlement has been arrived, the ICC shall record the settlement so arrived and forward the same to the Employer to take action as specified in the recommendation. Monetary settlement shall not be made a basis of conciliation. The committee shall provide copies of the settlement as recorded to the aggrieved person and the respondent.

PROCEDURE OF INQUIRY

1. On receipt of the Complaint, the Internal Complaints Committee shall send the copy of the Complaint to the respondent within a period of 7 working days from the receipt of the Complaint.
2. The respondent shall file its reply along with the supporting documents within a period not exceeding 10 working days from the receipt of Complaint.

Upon receipt of the respondent's response, the Internal Complaints Committee shall conduct a hearing where both the aggrieved and the respondent shall be heard in person. Also, under no circumstances a request to bring in a Counsel / Advocate or any outsider for the purposes of representation of either Party, shall be entertained.

Campus

The Internal Complaints Committee shall notify the respondent and aggrieved (as well as witnesses, if any) of the time and venue of the hearing in advance.

3. The Internal Complaints Committee will proceed to determine whether the allegations (assuming them to be true only for the purpose of this determination) made in the complaint fall under the purview of Sexual Harassment, preferably within 30 days from receipt of the complaint.

In the event, the allegation does not fall under the purview of Sexual Harassment or the allegation does not constitute an offence of Sexual Harassment, the Presiding Officer will record this finding with reasons and communicate the same to the aggrieved person.

4. If the Internal Complaints Committee determines that the allegations constitute an act of sexual harassment, it will proceed to investigate the allegations.
5. The Internal Complaints Committee shall have the right to terminate the inquiry proceedings or to give an ex-parte decision on the complaint, if the aggrieved person or the Respondent fails, without sufficient cause, to present herself or himself for three consecutive hearings. Provided that, such termination or ex-parte order may not be passed without giving a notice in writing, 15 days in advance to the party concerned.
6. Where such conduct, on the part of the accused, amounts to a specific offence under the law, Campus shall initiate appropriate action in accordance with law by making a complaint with the appropriate authority.
7. The Internal Complaints Committee shall conduct such investigations in a timely manner and shall submit a written report containing the findings and recommendations to the Senior Management Team as soon as practically possible and in any case, not later than 90 days from the date of receipt of the Complaint. The Senior Management Team will ensure corrective action on the recommendations of the Internal Complaints Committee and keep the aggrieved person informed of the same within 60 days from the date of receiving the report.
8. Inquiry Report: On the completion of an inquiry under this Act, the Internal Committee shall provide a report of its findings to the employer, within a period of ten days from the date of completion of the inquiry and such report be made available to the concerned parties.

ACTION AGAINST SEXUAL HARRASMENT

Anyone who has been found to have sexually harassed another person under the terms of this policy is liable to any of the following sanctions:

1. Formal apology
2. Counselling
3. Verbal or written warning
4. Adverse performance evaluation
5. Reduction in wages

6. Transfer
7. Demotion & Suspension
8. Dismissal
9. Police Complaint/ Handover/ Legal action

ANNUAL REPORT

The ICC shall in each calendar year prepare an annual report and shall submit it to the Employer/District officer and such report must include the following information:

- i. No. of complaints received;
- ii. No. of complaints disposed of;
- iii. No. of cases pending for more than 90 days;
- iv. No. of workshops/awareness programmes carried out;
- v. Nature of action taken by the employer.

CONFIDENTIALITY

Campus 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 the investigatory process to the extent practicable and appropriate under the circumstances.

PROTECTION TO COMPLAINANT / VICTIM

Campus is committed to ensuring that no employee who brings forward a harassment concern is subject to any form of reprisal. Any reprisal will be subject to disciplinary action.

Campus will ensure that the 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.

PUNISHMENT FOR FALSE COMPLAINTS

Where the Internal Complaints Committee arrives at a conclusion during or after the inquiry that the allegation against the Respondent is either malicious or false, appropriate punitive action may be taken by the Employer as per service rules applicable on recommendations of the committee.

GENERAL

Any term or aspect not specifically defined or set out in this Policy shall be construed to mean what is laid down in respect thereof under the acts or the rules.

AMENDMENT

This Policy may be amended, modified or revised from time to time by the Company.
