



PREVENTION OF SEXUAL HARASSMENT:

1.0 Objective

1.1 As equal opportunity employer, Fourfront aims to provide a work environment that is free of sexual harassment whether physical, verbal or psychological and free of gender-based discrimination.

We at Fourfront, forbid sexual harassment as well as discrimination of any employee on the basis of gender. Violation of the same by any employee, if proved, would result in appropriate disciplinary and/or criminal proceedings and action being initiated against him/her.

All managers shall exercise their power and authority to create and promote an environment that secures to employees of both genders these rights and ensures the safety and security of all employees working in the establishment.

Though a friendly atmosphere is welcome at the workplace, all should avoid making or passing remarks or comments, which could embarrass our colleagues or which could be interpreted by them as sexual in nature.

Any complaint of alleged sexual harassment will be investigated promptly and confidentially. Appropriate disciplinary measures will be taken against employees considered guilty of sexual harassment, or of condoning sexual harassment by others.

To this end, the policy provides for details as enumerated herein under:

2.0 Coverage

2.1 The Fourfront Prevention of Sexual Harassment Policy covers every employee across the Organization, whether probationer, permanent, temporary, on training or contract including individuals working in honorary, deputation, retainer ship or consultancy capacity.

3.0 Definitions

- 3.1 'Sexual harassment' means and includes sexually determined behavior (whether directly or by implication) such as any unwelcome physical contact and advances, demand or request for sexual favors, sexually colored remarks, display of pornography and any other unwelcome physical, verbal or nonverbal conduct of a sexual nature, from persons of the same or opposite sex.
- 3.2 Sexual attention becomes "Sexual Harassment" if it is being persisted, once it has been made clear that it is regarded by the recipient as offensive. However, even one incident of harassment may constitute Sexual Harassment if sufficiently serious.
- 3.3 Any of the following behavior is considered inappropriate within Fourfront working environment (during and in the course of employment) and is liable for disciplinary action:
 - 3.3.1 Verbal Harassment:
 - 3.3.1.1 A demand or request for sexual favors.
 - 3.3.1.2 Comments about a person's sex or private life.



- 3.3.1.3 Sexually colored remarks.
- 3.3.2 Physical harassment (also liable under the Indian Penal Code)
 - 3.3.2.1 Offensive gestures
 - 3.3.2.2 Touching in a sexual manner.
 - 3.3.2.3 Assault or coerced sexual acts.
- 3.3.3 Written or graphic harassment
 - 3.3.3.1 Unsolicited forwarding of pornographic pictures through email.
 - 3.3.3.2 The display of sexually suggestive objects, pictures, magazines, posters or cartoons in the work-area.
 - 3.3.3.3 Written communication that has sexual implications.
- 3.3.4 Emotional harassment
 - 3.3.4.1 Behavior that isolates or is discriminatory towards or excludes a person on the grounds of his or her sex.
 - 3.3.4.2 Demanding sexual favors in return for, or with a promise of favorable performance appraisals, promotions, sustained employment and provision of employment.

The list of instances mentioned above is illustrative and not exhaustive. Any such or similar behavior or act which may be perceived as sexual harassment by the aggrieved individual may be considered so, if agreed by the Apex Committee.

3.4 Such conduct, as mentioned in (clause 3.3), can be humiliating and may constitute health and safety problem. It is discriminatory for instance when the employee subjected to such conduct has reasonable grounds to believe that:

- 3.4.1 His/her objection would disadvantage him/her in connection with his/her employment or work including issues of salary, remuneration or promotion or when it creates a hostile work environment.
- 3.4.2 Adverse consequences might be visited if the victim does not consent to the condition in question or raises any objection thereto.

3.5 Third Party Harassment occurs, as per the Supreme Court Guidelines, as a result of an act or omission by or toward any third party or outsider. Fourfront and the person in-charge will take necessary and reasonable steps to assist the affected person in terms of support and preventive action.

This is particularly relevant where our employees are constantly in touch with third parties through their interaction with customers, dealers, suppliers, etc. Our employees are assured that Fourfront will support them in preventing or prosecuting any such case of misconduct.

4.0 Complaint Registration



4.1 Minor Complaints – If the complaint is minor (Verbal, Gesticulation or Graphical in nature) then the signature of the complainant is optional in the complaint registered and the complainant can remain anonymous. A third party such as another employee also has the right to bring to the notice of the Committee any violation of this policy.

4.2 Major Complaints – If the complaint is major (Emotional or Physical in nature), the complaint should be recorded in writing in the format given in Annexure 1 and signed by the complainant.

4.3 Complaints which are offences under the Indian Penal Code – In case of complaints of offences under the Indian Penal Code, the Redress Advisor should advise the complainant to file a complaint with the police immediately. A complaint can also be filed simultaneously with the Apex Committee. The Redress Advisor should leave the option with the complainant whether the complaint should be filed with the police, but the support of the company in filing the complaint should be ensured. The various offences that are covered under the Indian Penal Code are:

- 4.3.1 Violating modesty & Touching Body Parts (Section 354)
- 4.3.2 Vulgar comments (Section 509)
- 4.3.3 Rape and attempt to rape (Section 376 & 376/511)
- 4.3.4 Assault (Section 351)

4.4 All complaints handled by the Committee should be in writing to ensure consistency and accuracy in the complaint being lodged. The strictest confidentiality will be observed, therefore restricting all information generated to the smallest possible group. It must be ensured that the process is brief and quick.

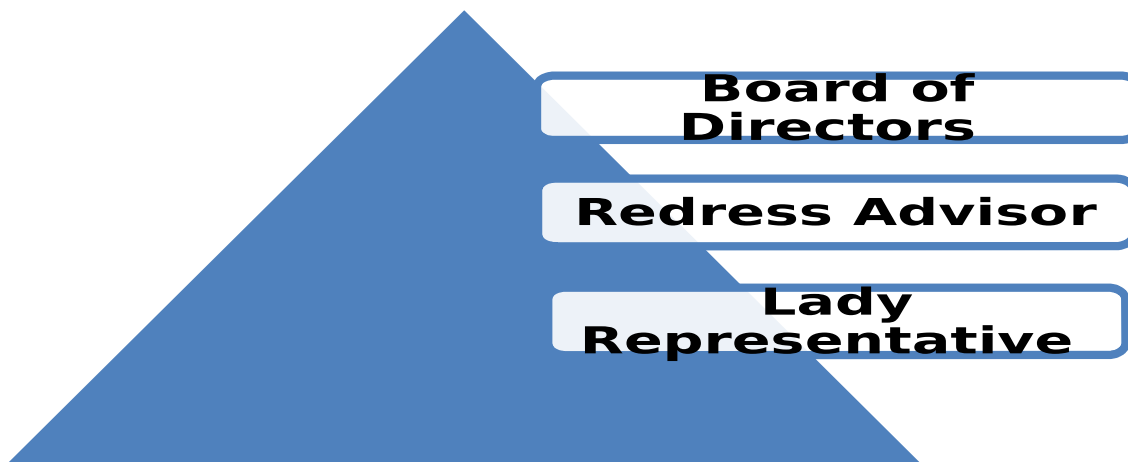
5.0 Redressal System

5.1 At Fourfront, all efforts will be made by the Management to investigate complaints of sexual harassment promptly and initiate proceedings to check the veracity of complaints and also take action to prevent sexual harassment at the workplace.

However, any complaints made frivolously or with reckless disregard that are so established by the Committee, would also attract severe penal action. With a view to investigating any complaints of sexual harassment, the Management has constituted an Apex Committee. The Apex Committee will deal with the complaints / reports / findings received from the person in-Charge (RA) for handling issues under this policy.

The Redress Advisor under the Apex Committee shall be a lady at all times.

Apex Committee Members:



Redressal procedures can be Informal or Formal based on the specific circumstances of the matter under consideration.

5.2 Informal Redressal System: The informal redressal system will be applicable under the following conditions:

- When the harassment is not a long-standing problem or not of a serious nature.
- When the alleged harassment seems open to discussion / when the facts are not very clear and conclusive.
- When the person raising the complaint chooses to have an informal redressal for resolving the issues.



Possible Actions for Informal redressal:

- Employee directly approaches the alleged harasser and requests that the harassing behavior be stopped with immediate effect.
- A discussion where the complainant and the alleged harasser are invited to discuss and resolve the issue at that level itself in the presence of Redress Advisor.
- The Committee may choose to issue an oral warning to the harasser and close the issue.

5.3 Formal Redressal System: For complaints of a more serious nature, RA should advise the complainant to register a written complaint for a formal redressal.

5.3.1 The committee should acknowledge receipt of the complaint within two working days.

5.3.2 A meeting date should be simultaneously fixed and notified to all parties concerned.

5.3.3 A copy of the complaint should be given to the alleged harasser, who will be allowed a minimum of 3 working days prior to appearing before the committee.

5.3.4 The Chairperson may nominate one person from the Committee to carry out a confidential investigation.

5.3.5 The report of the investigation should be submitted to the Committee one working day before the Committee convenes for the hearing.

5.3.6 Minutes will be taken down to record the proceedings by one of the committee member.

5.3.7 Redress application should be complete in all aspects.

5.3.8 Conclusions of the Committee will be informed to both the parties in writing.

5.3.9 In consultation with the Board of Directors of the Company, appropriate action will be determined and taken.

5.3.10 Action may vary from warning to termination of services, depending upon the intensity of violative conduct.

5.3.11 The Committee shall ensure that victims or witnesses are not victimized or discriminated against while dealing with complaints of sexual harassment. The Committee in appropriate cases shall also give due consideration to the victim's request seeking transfer or the perpetrator's transfer from the department/location/Company.

5.3.12 Where violative conduct amounts to a specific offence under the Indian Penal Code or under any other law, the Committee may initiate appropriate action in accordance with law by making a complaint with the appropriate authority.

5.3.13 A complaint made against any person and the proceedings, will be treated with strict confidentiality as may be possible, and persons who testify and give evidence will not be discriminated or penalized for their testimony before the Committee/RA. The Committee/RA may also at its discretion hold proceedings in camera.

6.0 False Claims

6.1 Dealing with complaints of sexual harassment is a very sensitive area and any allegations/ complaints, however discreetly handled, could prove derogatory for the person against whom it has been raised. Baseless allegations should therefore be strictly avoided.

6.2 In the case where a false complaint has been filed and the investigation has proved that the motivation of the complaint was purely to defame the alleged Harasser, disciplinary action will be initiated against the complainant and recorded in the personal file of the complainant.

6.3 The action to be taken will be recommended by the Committee to the Company's HR Department.

7.0 Communication & Awareness

7.1 The emphasis of Company's Policy against Sexual Harassment shall be preventive rather than prescriptive. To facilitate this approach, every employee will be communicated, through the HR Department, as to what the Company defines as appropriate and inappropriate behavior at workplace.

7.2 The most important step in this direction is the communication cascade. It will be the responsibility of the Company's RA to suitably cascade the Policy.

7.3 HR Department will obtain a declaration from every employee to ensure full understanding and acceptance of the policy.