



Sexual Harassment Policy

COMMITMENT:

Our Company is committed to providing work environment that ensures every employee is treated with dignity and respect and afforded equitable treatment. The Company is also committed to promoting a work environment that is conducive to the professional growth of its employees and encourages equality of opportunity. The Company will not tolerate any form of sexual harassment and is committed to take all necessary steps to ensure that its employees are not subjected to any form of harassment.

SCOPE:

This policy applies to all categories of employees of the Company, including permanent management and workmen, temporaries, trainees and employees on contract at their workplace or at client sites. The Company will not tolerate sexual harassment, if engaged in by clients or by suppliers or any other business associates.

The workplace includes:

1. All offices or other premises where the Company's business is conducted.
2. All company-related activities performed at any other site away from the Company's premises.
3. Any social, business or other functions where the conduct or comments may have an adverse impact on the workplace or workplace relations.

DEFINITION OF SEXUAL HARASSMENT:

Sexual harassment may be one or a series of incidents involving unsolicited and unwelcome sexual advances, Sexual Harassment at the workplace includes:

1. unwelcome sexual advances (verbal, written or physical),
2. demand or request for sexual favours,
3. any other type of sexually-oriented conduct,
4. verbal abuse or 'joking' that is sex-oriented,
5. making sexually coloured remarks or showing pornography,
6. any conduct that has the purpose or the effect of interfering with an individual's work performance or creating an intimidating, hostile or offensive work environment and/or submission to such conduct is either an explicit or implicit term or condition of employment and /or submission or rejection of the conduct is used as a basis for making employment decisions.

COMPLAINTS COMMITTEE:

The Company has instituted a Complaints Committee for redressal of sexual harassment complaint (made by the victim) and for ensuring time bound treatment of such complaints.

Initially, and till further notice, the Complaints Committee will comprise of the following members:-

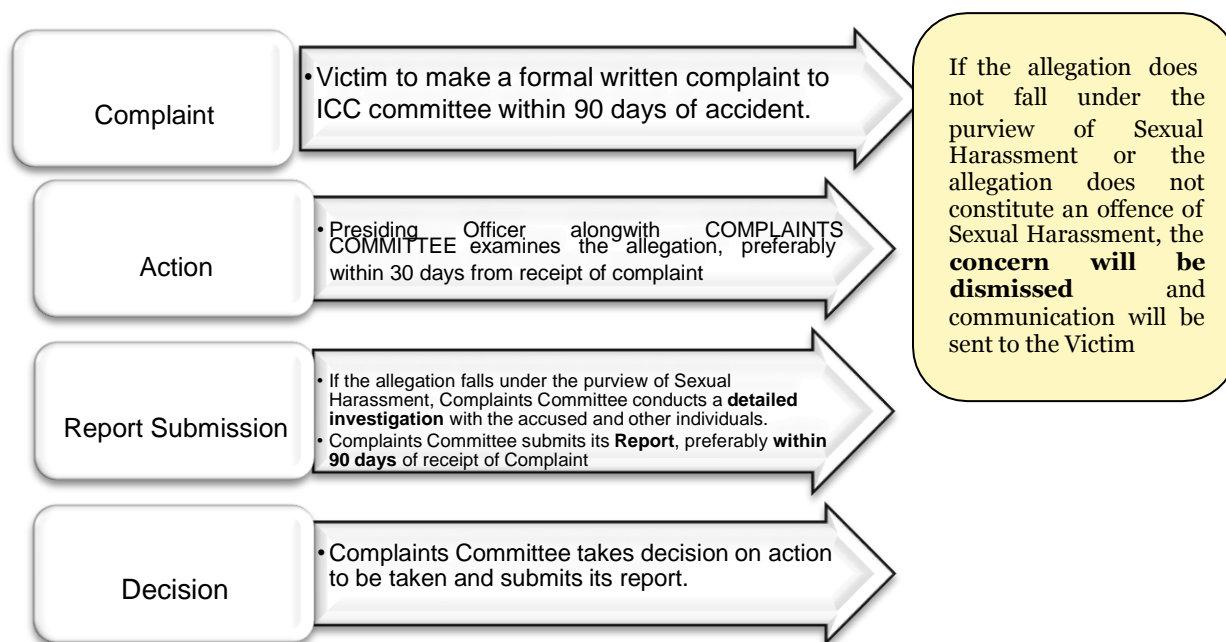
The Complaints Committee is responsible for:

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

Sno	Name	Mail ID	Position
1	Ms. Radhika Bagla	radhika@smcinsurance.com	Member
2	Ms. Divya Narang	divyanarang@smcinsurance.com	Member
3	Ms. Isha Rawat	isharawat@smcinsurance.com	Member
4	Mr. Marut Dhar	marut@smcinsurance.com	Member
5	Ms. Sakshi Mehta	sakshimehta@smcinsurance.com	Presiding Officer
6	Mr. Vedpal Singh	legal@smcinsurance.com	Invitee
7	Ms. Madhu Vij	madhuvij@hotmail.com	External Member

PROCEDURE FOR FILING COMPLAINTS AND INITIATING INQUIRY

- An aggrieved woman may complain to the Internal Committee. All complaints must be in writing within a period of three months from date of incident.
- The Committee shall provide for conciliation if requested by the complainant. Otherwise, the Committee shall initiate an inquiry. The inquiry shall be completed within a period of ninety days.



PENALTIES AND APPEAL

If the allegation is proved, the Committee shall recommend penalties for sexual harassment as per service rules applicable or the Rules under the Act. In addition, it may provide for monetary compensation to the complainant. If the allegation is proved to be false or malicious, the Committee may recommend action against the complainant. However, action may not be taken against a complainant merely on the inability to substantiate a complaint or provide adequate proof.

CONFIDENTIALITY:

The Company 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.

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.