

PREVENTION OF SEXUAL HARASSMENT POLICY

Philosophy

Saregama India Ltd. is a professionally managed organization and the core value underlying the corporate philosophy is to provide a healthy working environment that enables employees to work without fear of prejudice, gender bias and sexual harassment. The company also believes that all employees of the company have to be treated with dignity. Any sexual harassment at the work place or other than work place if involving employees is a grave offence and is, therefore, punishable.

Saregama has Zero Tolerance to any form of harassment especially if it is sexual in nature. As per the Ethics policy, Saregama's approach is to spread awareness thereby putting a stop to Sexual Harassment at the workplace and in the event of an occurrence of any such incident, enforces strict action against the perpetrator.

It is the duty of the organization to deter acts of sexual harassment and provide procedure for resolution, settlement or prosecution of acts of sexual harassment;

- Where the conduct would constitute misconduct under the rules or regulations of the organization, Saregama shall initiate reformatory action against him/her;
- Where the Aggrieved employee is not satisfied with the reformatory actions taken by Saregama and desires to institute the above offence under the local regulatory regime or any other law, the Prevention of sexual harassment (POSH) Committee of Saregama can aid the aggrieved employee in initiating action with relevant authorities.

Definition, Scope and Effective Date

This policy extends to all employees of the company and is deemed to be incorporated in the service conditions of all employees and comes into effect immediately.

Sexual Harassment by any employee in the work place, which may lead to preferential treatment, detrimental treatment, intimidating or offensive work environment or humiliating conduct, has been defined as including "**unwelcome**" sexually determined behaviour (whether directly or by implication)

- Unwelcome sexual advances, request or demand for sexual favors either explicitly or implicitly in return for any favor or otherwise.
- Unwelcome sexual advances involving verbal, non verbal or physical conduct such as sexually colored remarks, jokes, letters, SMS, phone calls, e-mail, gestures, showing of pornography, lurid stares, physical contact or molestation, stalking, sounds which offends the individuals dignity.

- Act or conduct by a person in authority which creates the environment at work place or outside work place hostile or intimidating to the person belonging to the opposite or same sex.

In this policy:

'Aggrieved employee' means the person who alleges to have been subjected to any act of sexual harassment by the respondent

'Respondent' means a person against whom the aggrieved employee has made her/his complaint.

'Employee' means a person employed at the workplace for any work on regular, temporary, ad hoc or daily wages 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 expressed or implied and includes a co-worker, a contract worker, probationer, trainee, apprentice or called by any such name.

'Workplace' means Saregama India Limited and its affiliates 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 journey.

Complaint Redressal Committee

The company will form a five member committee. The committee will consist of three female employees and two male employees selected by the executive director-HR. The committee will be headed by a female employee as chair person the tenure of the members shall be twenty four months the committee will have the power to co opt any employee as deemed fit to facilitate the process of enquiry.

Complaints Procedure

If an employee who feels is being sexually harassed directly or indirectly may submit a complaint verbally or in writing to:

- a. Any member of the POSH Committee
- b. Send an email to the confidential ID - posh@rp-sg.in

- An aggrieved woman can make a complaint to the committee in writing within a period of 3 months from the date of incidents and in case of a series of incidents, within a period of three months from the date of last incidents.
- In case the aggrieved woman cannot lodge the complaint in writing, the Presiding Officer or any member of the committee will render all reasonable assistance to the woman for making the complaint in writing. In case the aggrieved woman is unable to make the complaint on her own for any reason, the complaint can be made on her behalf by a third party.
- On receiving a complaint, an investigating quorum needs to be formed and before starting a formal investigation.

Redressal Committees

The Internal Complaints committee will have the following members:

1. Ms BR Vijaylakshmi, VP - South TV – Presiding Officer
2. Mr.S. Sivakumar, VP-Finance & Business Development - Member
3. Mr. Praveen Kaushal, GM-Content - Member
4. Ms Sonalika Johri, GM-HR- Member
5. Ms Ekta Bhattar, Sr. Manager-HR- Member
6. Ms Sneha Khandekar, External Member

Constitution of Internal Complaints Committee

- At least 50% of committee members have to be women.
- Presiding Officer of each committee has to be a senior female employee.
- Minimum 3 members are required to form the quorum for any investigation. Minimum 50% of the quorum thus formed has to be female.
- One of the members of the investigating quorum should be from NGOs or associations committed to the cause of women or a person familiar with issues relating to sexual harassment. This person can be an employee as well provided s/he is actively involved with an NGO or similar social organization.
- Committee members can hold the position for a maximum term of 3 years.

Redressal Process

Conciliation

The committee may, before initiating an inquiry, and at the request of the aggrieved employee take steps to settle the matter between the aggrieved employee and the respondent through

conciliation. Where a settlement is arrived at, no further inquiry shall be conducted by POSH Committee. In the absence of conciliation, the POSH Committee, shall constitute an investigating quorum to investigate into the issue and prepare a report at the end of the investigation.

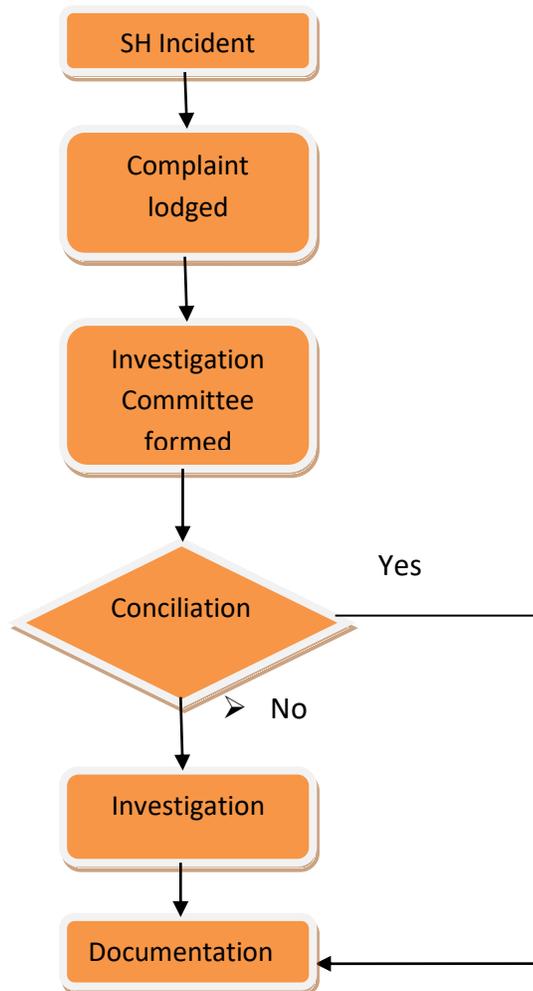
Investigation by the Investigating Quorum:

- The internal committee will proceed to make the inquiry as per the service rules applicable to the employee (respondent).
- The committee, for the purpose of its investigation, is empowered to elicit all forms of evidence, including access to written communication, witnesses and previous records of the employees concerned. The POSH Committee can summon and enforce the attendance of any person and interrogate him, and require the production of any document which might be required during the investigation.
- The committee shall not allow either parties to bring in any legal practitioner to represent them in their case at any stage of the proceedings before the committee.
- During the investigation, at the written request of the aggrieved, the POSH Committee may recommend “Interim Relief” by transferring the aggrieved or the respondent to another location/department or granting the aggrieved woman leave up to 3 months. Such leave, if granted, should be over and above her existing leave balance. The committee shall have the right to close the inquiry proceedings or to give an *ex-parte* decision on the complaint, if the complainant or respondent fails (without sufficient cause) to present herself or himself for three consecutive hearings convened by the Presiding Officer. However, such a decision will not be taken unless the concerned party is given 15 days’ written notice before the case is closed.
- After hearing all parties involved in the incident, the investigating quorum will prepare a case report, in writing, outlining the case, the investigation and suggest the reformative action to be initiated. This report needs to be submitted to Head-HR.
- The investigation report and case closure recommendation has to be signed off by the following people –POSH Presiding Officer and Head HR.
- Withdrawal of the complaint at any stage of the proceedings does not preclude the Committee from proceeding with the investigation where there is obvious truth or merit to the allegations in the complaint or where there is documentary or direct evidence that can prove the guilt of the respondent.
- All cases need to be closed within a period of 45 days from the date of the formal receipt of the complaint.
- To the extent possible, the identity of the Aggrieved, Witnesses and the Respondent will be protected against unnecessary disclosure. All efforts shall be made to ensure that all proceedings remain confidential. The organization may initiate disciplinary action against anyone found guilty of contravening the provisions pertaining to confidentiality as detailed out in section 16 of the Act.

- Disposal of enquiry report by Head-HR.
- Provision of appeal to CEO. After consultation with Group President-HR will take the final decision.



The process flow of the investigation process is captured below –



Reformative Action

Depending on the severity of the complaint, the following reformative actions(s) can be recommended:

- If found guilty, the accused may be separated from the organization.
- If the Aggrieved employee wants to be transferred to another centre or process as a result of the incident, the organization shall assist in the transfer. The respondent may also be transferred, if the organization deems fit to do so.

- If the aggrieved employee has lodged a false complaint then action will be taken against him/her for such an act. This could include a warning notice or, suspension; it may also amount to termination of services.
- Apart from the action(s) listed above, any other action(s) as deemed appropriate depending on the severity of the complaint might be recommended.
- In case the aggrieved employee is not satisfied with the reformatory actions taken by the organization and desires to approach the local regulatory regime or any other law, the POSH Committee will aid the aggrieved employee in initiating action with relevant authorities.

Training & Awareness

- Saregama shall conduct regular awareness programmes for all employees and also organise orientation programs, capacity and skill building programs for the members of the internal committees. Attendance of the committee members is mandatory in these orientation/skill building sessions. Diverse mediums of training and awareness creation like workshops, sessions, computer-based trainings will be used to clearly demarcate unacceptable behaviour in the organization.
- The names and contact details of the POSH committee members should be updated on the ESS. Posters with names and contact details of the POSH Committee members should be displayed in all the offices.
- The list of members needs to be reviewed and updated on a quarterly basis. In case a POSH committee member moves out of the organization, the same has to be immediately reported to the POSH Committee and replacement members identified.

Conclusion

As a good corporate citizen Saregama India Ltd. is committed to foster a gender friendly work place its seeks to enhance equal opportunities for men and women, prevent/stop/redress sexual harassment at the work place and institute good employment practices.