ANTI SEXUAL HARASSMENT POLICY (ASH)

Objective

In SV SportzVillage Foundation ("SportzVillage") we endeavor to ensure a safe, secure and congenial work environment where employees will deliver their best without any inhibition, threat or fear, it is important to evolve an anti sexual harassment policy.

SportzVillage Foundation has Zero Tolerance to any form of harassment especially if it is sexual in nature. As per the policy of SportzVillage Foundation, SportzVillage Foundation' 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.

This policy has been prepared in accordance to the provisions as stipulated in the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (the "Act")

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, SportzVillage Foundation shall initiate reformative action against him/her;
- where the Aggrieved employee is not satisfied with the reformatory actions taken by SportzVillage Foundation and desires to institute the above offence under the local regulatory regime or any other law, the Internal Complaints Committee of SportzVillage Foundation can aid the Aggrieved employee in initiating action with relevant authorities.

Conduct constituting sexual harassment

Sexual harassment shall mean and include any one of the following unwelcome acts or behaviour (whether directly or by implication):

_ physical contact and advances;

_ a demand or request for sexual favours;

_ sexually coloured remarks;

_ showing pornography;

_ or any other unwelcome physical, verbal or non-verbal conduct of a sexual nature.

Anti Sexual Harassment Committee

SportzVillage Foundation has an Internal Complaints Committee (ICC). This committee work towards ensuring adherence across the organization, as prescribed under this policy. The constitution of the ICC shall be as follows:

(e) A Presiding Officer who shall be a woman employed at a senior level at the Company from amongst the employees;
(f) 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;
(g) one member from amongst non-governmental organizations or associations committed to the cause of women or a person familiar with the issues relating to sexual harassment;
(h) Provided that at least one-half of the total Members so nominated shall be women.

Training

Company shall conduct regular education and awareness programmes, with the help of diverse mediums of training for eg. Workshops, sessions, computer based training etc to clearly outline unacceptable behaviour, specifics of the ASH policy, thereby, preventing incidents of sexual harassment.

Complaints Procedure

- Any employee who has alleged to have been sexually harassed may make, in writing, a complaint of sexual harassment at the workplace to the ICC, within a period of three months from the date of incident and in case of a series of incidents, within a period of three months from the date of last incident;

- In case the complaint cannot be made in writing, the Presiding Officer or any Member of the ICC shall render all reasonable assistance to the woman for making the complaint in writing.

- The ICC may, for the reasons to be recorded in writing, extend the time limit not exceeding three months, if it is satisfied that the circumstances were such which prevented the woman from filing a complaint within the said period.

- Where the aggrieved employee is unable to make a complaint on account of her physical or mental incapacity or death or otherwise, her legal heir or such other person as may be prescribed may make a complaint in accordance to the provisions stated herein above.

Settlement

- The ICC may, before initiating an inquiry and at the request of the aggrieved woman take steps to settle the matter between her and the respondent through conciliation.
- Provided that no monetary settlement shall be made as a basis of conciliation.
- Where a settlement has been arrived in accordance to above, the ICC shall record the settlement so arrived and forward the same to the employer or the District Officer as notified by the relevant authorities from time to time to take action as specified in the recommendation.
- The ICC shall provide the copies of the settlement to the aggrieved woman and the respondent.
- Where a settlement is arrived in accordance to above, no further inquiry shall be conducted by the ICC.

Inquiry

Once the complaint is made by the aggrieved employee in accordance with the procedure herein above, the inquiry shall be completed within a period of ninety days.

On the recommendation of the ICC, the employer shall implement the recommendations and send the report of such implementation to the ICC.

On the completion of an inquiry, the ICC, shall provide a report of its findings to the employer, or as the case may be, the District Officer within a period of ten days from the date of completion of the inquiry and such report be made available to the concerned parties.

Where the ICC, arrives at the conclusion that the allegation against the respondent has not been proved, it shall recommend to the employer and the District Officer that no action is required to be taken in the matter.

Where the ICC, arrives at the conclusion that the allegation against the respondent has been proved, it shall recommend to the employer or the District Officer, as the case may be:

(i) to take action for sexual harassment as a misconduct in accordance with the provisions of the service rules applicable to the respondent or where no such service rules have been made, in such manner as may be prescribed;

(ii) to deduct, notwithstanding anything in the service rules applicable to the respondent, from the salary or wages of the respondent such sum as it may consider appropriate to be paid to the aggrieved woman or to her legal heirs, as it may determine, in accordance with the provisions of the Act;

(iii) In case the employer is unable to make such deduction from the salary of the respondent due to his being absent from duty or cessation of employment it may direct to the respondent to pay such sum to the aggrieved woman;

(iv) In case the respondent fails to pay the sum referred to in clause (ii), the ICC may forward the order for recovery of the sum as an arrear of land revenue to the concerned District Officer.

The employer or the District Officer shall act upon the recommendation within sixty days of its receipt by him.

Where the ICC arrives at a conclusion that the allegation against the respondent is malicious or the aggrieved employee or any other person making the complaint has made the complaint knowing it to be false or the aggrieved employee or any other person making the complaint has produced any forged or

misleading document, it may recommend to the employer or the District Officer, as the case may be, to take action against the aggrieved employee or the person who has made the complaint, as the case may be.

Provided that a mere inability to substantiate a complaint or provide adequate proof need not attract action against the complainant under this section:

Provided further that the malicious intent on part of the complaint shall be established after an inquiry in accordance with the procedure prescribed herein above, before any action is recommended.

Review:

All cases will be reviewed by the ICC on a quarterly basis and a quarterly report of cases will be presented to the Board of Directors or any other such committee appointed by them. The Board of Directors or such committee shall also maintain an annual report of all cases and ASH related activities carried out during the year. On receiving any directions, suggestions, amendments or comments from Employees, Leadership or as may be derived by ICC on reviewing the cases; the Anti Sexual Harassment Policy may be changed to that extent.