



# **Policy on Prevention, Prohibition, and Redressal of Sexual Harassment of women at Workplace**

### Amendment History

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1.0	2007	HR Department	COD Date	BOD Date	New Policy
2.0	Jul/2019	HR Department	COD/NRC Date	BOD Date 29/11/2019	Revision
3.0	March/2022	HR Department	Audit Committee	BOD Date 23/03/2022	Revision
3.1	June/2022	HR Department	CHRO	MD & CEO 10/06/2022	ICC members updated
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3.3	April /2023	HR Department	CHRO	MD & CEO 25/04/2022	ICC members updated,  Minor changes in guidelines of ICC members
3.4	May/2023	HR Department	CHRO	Audit committee and BOD Date 24/05/2023	Inquiry time limit updated Guidelines for ICC members updated Complaint's withdrawal process updated Zone wise ICC members updated
3.5	Feb/2024	HR Department	CHRO	Audit committee and BOD Date 06/02/24	Reviewed no Changes
3.6	Jul/2024	HR Department	CHRO	Audit committee and BOD Date 08/08/24	IC list updated; ICC word substituted by IC
3.7	Nov/2024	P&C	CPO	Audit committee and BOD	Department Name changed from 'HR & L&D' to 'People, Culture and Capability"
3.8	Jan/2025	P&C	CPO	Audit committee,BOD	IC list updated

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## Policy

Universal Sampo General insurance Company (USGI / Employer/ the Company) is committed to creating an environment where all its employees, agents, representatives, and customers are treated with dignity, respect, and equality. The Company is committed to ensuring that the work environment is free from unlawful discrimination, harassment, and bullying. Every employee has the Right to be free from Sexual Harassment and the Right to Work in an environment free from any form of Sexual Harassment within the company but not limited to the workplace and other locations directly related to the Company's business.

At Universal Sampo General Insurance Company Ltd, we have zero-tolerance for sexual harassment of women. We value each woman employee working with us and wish to protect their dignity and self-respect. The Employer will not tolerate any form of sexual harassment and take all necessary steps to ensure that its employees are not subjected to any form of it. The Employer will actively promote a social, physical, and psychological environment that will raise awareness about and deter acts of sexual harassment. We aim to create a workplace that respects concerns and issues and is sensitive to all genders.

This Policy has been drawn up in line with The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (Act). The purpose of this Policy is to provide safe environment by prevention and redressal of sexual harassment at workplace and for matters connected therewith or incidental.

## Objective

- To uphold the commitment of the Employer to provide an environment free of discrimination and indecent behavior against women at workplace.
- To actively promote a social, physical, and psychological environment that will raise awareness about and deter acts of sexual harassment of women.
- To provide protection against sexual harassment at the workplace and redressal of complaints
- To ensure the implementation of the Policy in letter and spirit by undertaking all necessary and reasonable steps including the constitution of appropriate Committees for purposes of gender sensitization and to conduct enquiries into complaints of sexual harassment.
- To evolve a mechanism and forum for the prevention and redressal of sexual harassment of women

## Scope

The policy is regarding Prevention, Prohibition and Redressal of Sexual Harassment of women at workplace covers every "woman employee" across the Company. USGI encourages every woman employee, on-roll or off-roll or working independently with USGI, who believes that she is being sexually harassed, to use the redressal mechanism as provided in this policy.

The Policy covers all women employees in the Workplace. This also covers third party employees, contractual part / full time employees, probationer, trainee, consultants on assignment on Employer premises and the persons visiting the Employer premises. An act of offence shall include any place visited by the woman employee arising out of or during the course of employment including transportation provided by the employer for undertaking such journey.

USGI has constituted the IC for all its offices and administrative units in accordance with the Act.

This Policy comes into force with immediate effect.

## Definitions

### Sexual Harassment

Sexual harassment includes, but is not limited to, any unwelcome behaviour (whether direct or by implication) such as:

- i) Physical contacts 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.

**“Act”** means The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, as amended from time to time.

**“Aggrieved Woman”** means a person in relation to workplace whether employed or not, who alleges to have been subject to any act of sexual harassment by the respondent at workplace.

**“Respondent”** means a person against whom the aggrieved woman has made a complaint.

**“Employee(s)”** means a person employed at workplace for any work on regular, temporary, ad hoc, or daily wage 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 express or implied and includes a co-worker, a contract worker, probationer, trainee, apprentice or called by any other such name

**“Employer”** means Universal Sampo General Insurance Company Limited.

**“Workplace”** in relation to an employee, means any place where an Aggrieved Woman or defendant or both is/are employed or work(s), or visit(s) in connection with work during the course of or arising out of employment with the Employer. In case of non-employee, the Workplace shall mean the Employer premises

“**Rules**” shall mean the Redressal/Complaint (For Prevention and Redressal Against Complaints of Sexual Harassment of Working Women at Workplace, 2013), its Rules and Constitution

### Prevention of Sexual Harassment at Workplace

No person at a workplace shall be subjected to sexual harassment or any other unwelcome conduct of sexual nature whether verbal, textual, physical, graphic, or electronic or by any other actions, which may include:

- a. Implied or overt promise of preferential treatment in employment; or
  - b. Implied or overt threat of detrimental treatment in employment; or
  - c. Implied or overt threat about the present or future employment status.
  - d. Conduct which interferes with work or creates an intimidating or offensive or hostile work environment; or
  - e. Humiliating conduct constituting health and safety problems.
- More examples of the types of conduct expressly prohibited by this Policy include, but are not limited to, the following:
    1. Unwelcome sexual advances or propositions
    2. Touching, such as rubbing or massaging someone’s neck or shoulders, stroking someone’s hair, brushing against another’s body: or grabbing, groping, kissing, or fondling another person.
    3. Lewd, foul, off-colour, sexually oriented comments, or jokes.
    4. Sexually suggestive or explicit posters, calendars, photographs, graffiti, cartoons, or screen savers.
    5. Unwanted or offensive letters or poems
    6. The transmission of sexually offensive e-mail, voicemail, or instant or text messages
    7. Sexually oriented or explicit remarks, including written or oral references to sexual conduct, gossip regarding one’s sex life, body, sexual activities, deficiencies, or prowess.
    8. Questions about one’s sex life or experiences.
    9. Repeated requests for dates.
    10. Requests, demands, or pressure for sexual favours in return for employment rewards, or threats if sexual favours are not provided; 11. Any other related conduct deemed inappropriate by the Employer.

### Constitution of Internal Committee

Internal Committee (IC) has been constituted by the company for redressal of sexual harassment complaint (made by the female victim) and for ensuring time bound treatment of such complaints

- **A Presiding Officer** from amongst employees, who shall be a woman employee of Senior Management
- **Members (not less than two)** from amongst employees preferably committed to the cause of women or who have experience in social work or have a legal knowledge.
- **Member (One)** from amongst such non-governmental organizations or associations or other interests committed to the cause of women, at such fees / allowances as the Employer may prescribe.
- At least one half of the total members shall be women.

- Such other member as the Employer may deem fit.
- A quorum of 3 members is required to be present for the proceedings to take place.
- The Presiding Officer and Members of the Internal Complaints Committee hold office for **3 years** from the date of the nomination.
- The Committee shall consist of unbiased and independent members who are not involved or related to either with complainant or with the respondent. In case any of the members of Internal Complaints Committee is found to be involved or a party to the complainant or with the respondent, the person shall be replaced with another suitable member.
- MD & CEO is authorized to name the replacements in the IC.
- MD & CEO is authorized to give names for IC at the Zones or the different regions depending on the need basis.
- **Removals of members** - where the Presiding Officer or any Member of the IC.
  - (a) contravenes the provisions of section 16; or
  - (b) has been convicted for an offence or an inquiry into an offence under any law for the time being in force is pending against him; or
  - (c) has been found guilty in any disciplinary proceedings or a disciplinary proceeding is pending against him; or
  - (d) has so abused his position as to render his continuance in office prejudicial to public interest,
  - (e) Such Presiding Officer or Member, as the case may be, shall be removed from the IC and the vacancy so created or any casual vacancy shall be filled by fresh nomination in accordance with the provisions of this policy.
- **The IC is responsible for:**
  - Receiving Complaint
  - Investigate every formal written complaint of sexual harassment and submitting findings and recommendations of inquiries.
  - Recommending appropriate remedial measures to respond to any substantiated allegations of sexual harassment
  - Ensuring that the order passed by it is complied with by the Parties offender and in case of default in compliance, appropriate steps are taken in accordance with the provisions of the Act.
  - Ensuring that the inquiry into a complaint be completed within a period of 90 days from the date of receipt of the complaint.

- **Powers of IC**

For the purpose of making an inquiry the IC shall have the same powers as are vested in a civil court under the Code of Civil Procedure 1908 when trying a suit in respect of the following:

- Summoning and enforcing the attendance of any person and examining him on oath
- Requiring the discovery and production of documents
- Any other matter which may be prescribed

### Logging a Complaint

Aggrieved Woman may be reluctant to complain or to make a formal written complaint against the Respondent due to any of the reasons but not limited to:

1. Lack of clarity that whether a behaviour construes Sexual Harassment or not
2. Any fear about the impact of the Complaint on work performance
3. High sensitivity of the behaviour involved or the relationship with the Respondent
4. Need to resolve the issue directly with the Respondent without a formal enquiry.

In such a case, Aggrieved Woman can clearly explain to the Respondent that

- a. The conduct in question is unwelcome and/or offensive to the recipient and/or
- b. Makes the recipient uncomfortable and/or it interferes with the recipient's work and,
- c. As such, the Respondent should immediately cease such conduct.

**OR**

Aggrieved Woman can contact a Committee member and seek advice.

**OR**

An Aggrieved Woman or the legal heir may make a Complaint to the Committee in writing. In case the Complaint cannot be made in writing, the Committee or any of its members shall provide reasonable assistance for making the Complaint in writing.

a) Where the Aggrieved Woman is unable to make a Complaint on account of her physical incapacity, a Complaint may be filed by

i. Her relative or friend; or ii. Her co-worker; or iii. An officer of the National Commission for Women or State Commission for Women; or iv. Any person who has knowledge of the incident, with the written consent of the Aggrieved Woman.

b) Where the Aggrieved Woman is unable to make a Complaint on account of her mental incapacity, a Complaint may be filed by – i. Her relative or friend; or ii. A special educator; or iii. A qualified psychiatrist or psychologist; or iv. The guardian or authority under whose care she is receiving treatment or care, or v. Any person who has knowledge jointly with her relative or friend or a special educator or qualified psychiatrist or psychologist, or guardian or authority under whose care she is receiving treatment or care.



- c) Where the Aggrieved Woman for any other reason is unable to make a Complaint, a Complaint may be filed by a person who has knowledge of the incident, with her written consent.
- d) Where the Aggrieved Woman is dead, a Complaint may be filed by any person who has knowledge of the incident, with the written consent of her legal heir(s).
- e) Where sexual harassment occurs as a result of an act or omission by any third party or outsider, the Employer will take all steps necessary and reasonable to assist the Complainant in terms of support and preventive action.

### **Procedure for Resolution, Settlement or Prosecution of acts of Sexual Harassment**

USGI is committed to providing a supportive environment to resolve concerns of sexual harassment of woman as under: The pre-investigation and formal complaint process that can be adopted by the aggrieved woman is as follows

**The pre-investigation and formal complaint process that can be adopted by the aggrieved woman is as follows:**

1. Convey to the person who is the cause of distress, about what that person's actions, words, behaviour and / or gestures are resulting in and convey in no uncertain terms that such behaviour is not appreciated.
2. The second step would be to approach someone within the company – preferably Reporting Manager, HOD, or P&C Representative.
3. At the request of an Aggrieved Woman, the Committee may, before initiating inquiry, take steps to settle the matter between her and the Respondent through conciliation. The conciliation shall not result in any kind of monetary settlement.

#### **• Procedure for Formal Grievance Redressal**

1. Any aggrieved woman may make a formal complaint to the IC constituted by the Company. The complaint shall have to be in writing and can be in the form of a letter, within a period of 3 months from the date of occurrence of the alleged incident and in case of a series of incidents, within a period of 3 months from the date of last incident, sent in a sealed envelope and addressed to the Presiding Officer of IC. Alternately, the employee can send the complaint through an email and address it to [lcc@universalsompo.com](mailto:lcc@universalsompo.com). The complainant is required to disclose her name, department, and location she is working in and contact details including phone number, to enable the members of the IC to contact her and take the matter forward.
2. Where the aggrieved woman 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 from time to time under the Act may make a complaint under this provision.

3. If the aggrieved woman, out of her own will, requests the IC to take steps to settle the matter between her and the respondent, the IC may, before the initiation of inquiry, arrange for conciliation.
4. The IC shall provide the copies of the settlement as recorded to the aggrieved woman and the respondent.
5. Where a settlement is arrived, no further inquiry shall be conducted by the IC.
6. In case the settlement is arrived at between the complainant and the respondent, the IC shall record the settlement so arrived and forward the same to MD & CEO to take action as specified in the recommendation.

- **Inquiry Process**

1. The IC shall immediately proceed with the inquiry and communicate the same to the complainant and person against whom complaint is made.
2. The IC shall prepare and hand over the Statement of Allegation to the person against whom complaint is made and give him/her opportunity to submit a written explanation if he /she so desires within 10 days of receipt of the same.
3. The Complainant shall be provided with a copy of the written explanation submitted by the person against whom complaint is made.
4. If the Complainant or the person against whom complaint is made desires any witness/es to be called, they shall communicate in writing to the IC the names of witness/es whom they propose to call.
5. If the Complainant desires to tender any documents, in electronic form as well as per provisions of Information Technology Act 2000, by way of evidence before the IC, she shall supply original copies of such documents. Similarly, if the person against whom complaint is made desires to tender any documents in evidence before the IC, he shall supply original copies of such documents. Both shall affix his / her signature on the respective documents to certify these to be original copies.
6. The IC shall call upon all witnesses mentioned by both the parties.
7. The IC shall, during the course of inquiry, provide every reasonable opportunity to the Complainant and to the person against whom complaint is made, for putting forward and defending their respective case.
8. The IC may, upon receipt of a written request from the aggrieved woman, recommend to the MD & CEO to:

- a. Transfer the aggrieved woman or respondent to any other workplace
  - b. Grant leave to the aggrieved woman up to a period of 3 months
  - c. Grant such other relief to the aggrieved woman as may be prescribed under the Act from time to time
9. The Committee shall complete the "Inquiry" within reasonable period, but not beyond 90 days, and communicate and make its findings made available to both the parties enabling them to make representation against the findings before the IC. The report of the IC shall be treated as an inquiry report on the basis of which an erring employee can be awarded appropriate punishment straightaway.
  10. The IC shall, upon completion of inquiry, provide a report of its findings to the MD & CEO within 10 days from completion of the inquiry. The report shall also be made available to the parties.
  11. In case IC arrives at the finding that allegations are not proved it shall recommend to the Disciplinary Committee that no action is required to be taken in the matter.
  12. In case IC arrives at the finding that allegation against the respondent has been proved it shall recommend to disciplinary committee of the Company for suitable action, as deemed fit for the matter and in accordance with the service rules applicable to the respondent, leading to termination of the service of the employee.
  13. The employer shall act upon the recommendation of the committee within 60 days of its receipt of the report.

- **Corrective action may include any of the following:**

- a. Take sexual harassment as misconduct.
- b. Written warning to the perpetrator and a copy of it maintained in the employee's file.
- c. Deprived of Increment and or Promotion.
- d. Change of work assignment / transfer for either the perpetrator or the victim.
- e. Order dismissal depending upon the severity & sensitivity of the incident
- f. To deduct salary from the respondent or issue direction for payment as it may consider appropriate to be paid to the aggrieved person.

The IC will protect the identity of all individuals involved during the process, including the aggrieved woman and respondent and contents of complaints and inquiry proceedings.

- **False Accusations**

- The complaint of Sexual harassment made by any employee shall be taken up with utmost seriousness by the company, and there shall be zero tolerance for any accusation.

- If the IC comes to a conclusion that the allegation was made with malicious intent or the aggrieved person or any other person making the complaint on behalf of the aggrieved person produced false or forged or misleading documents to prove her case, the IC may recommend action to be taken against the person who has made the complaint, including termination of service. In such a case, malicious intent has to be established after an inquiry before any action is recommended. A mere inability to substantiate a complaint or provide adequate proof would not attract action as provided herein. A similar recommendation for taking action would be recommended against any witness whom the IC concludes that she has given false evidence or produced forged or misleading documents.

### Complaint Withdrawal

- If at any stage, after the filing of a Complaint and during any proceedings, the Aggrieved Woman wishes to withdraw the Complaint, then the Aggrieved Woman shall have the right to withdraw the Complaint in writing and the Committee shall permit the same and if an inquiry has commenced, then the Committee shall discontinue the inquiry.
- However, if the inquiry proceedings are completed before the request for withdrawal of the complaint is received, the IC will submit its findings and recommendations to the management.
- If it is brought to the notice of the Committee, or the Committee is of the opinion that, pressure is being brought on the Aggrieved Woman to withdraw the Complaint or not go through with the Complaint, then the Committee will record the same.
- In case a complaint is made and even if it is withdrawn, the Committee will assess whether complaint was made purposively, and the complainant should be subjected to process followed in "False Accusations".

### Duties of Employer

- Provide safe working environment at the workplace which shall include safety from the persons coming into contact at the workplace.
- Display at any conspicuous place in the workplace, the penal consequences of sexual harassments; and the order constituting the IC.
- Organise workshops and awareness programmes at regular intervals for sensitizing the employees with the provisions of the Act and orientation programs for the members of IC in the manner as may be prescribed.
- Provide necessary facilities to the IC for dealing with the complaint and conducting an inquiry.
- Assist in securing the attendance of respondent and witnesses before the IC.
- Provide assistance to the woman if she so chooses to file a complaint in relation to the offence under the Indian Penal Code or any other law for the time being in force.
- Cause to initiate action, under the Indian Penal Code or any other law for the time being in force, against the perpetrator, or if the aggrieved woman so desires, where the perpetrator is not an employee, in the workplace at which the incident of sexual harassment took place.

- Monitor the timely submission of reports by the IC

### Guidelines for member of Internal Committee

- The Internal Complaints Committee shall follow principle of Natural Justice while handling such complaints. Also note that, principles of 'Preponderance of possibilities' will prevail.
- Empathize with the complainant but be unbiased.
- Handle complaints in a confidential manner and follow the timelines as prescribed by the law.
- Maintain all the data related to sexual harassment cases in the company.
- IC may recommend to the management if counselling is required by complainant or respondent.
- Inform all employees that it is their obligation to report sexual harassment that they either experience or witness.

### Protection against Complaint/ Victim

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

The Company will ensure that the victim or witnesses are not victimized or discriminated against while dealing with complaints of sexual harassment.

### Adoption of Section 16 as per the Act

Notwithstanding anything contained in the Right to Information Act, 2005, the contents of the complaint made under Section 9 of the Act, the identity and addresses of the aggrieved woman, respondent and witnesses, any information relating to conciliation and inquiry proceedings, recommendations of the IC and the action taken by the Company under the provisions of the Act shall not be published, communicated, or made known to the public, press and media in any manner.

Provided that information may be disseminated regarding the justice secured to any victim of sexual harassment under the Act and this policy without disclosing the name, address, identity, or any other particulars calculated to lead to the identification of the aggrieved woman and witnesses.

### 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.

## List of IC members

HO – Mumbai & West Zone	Member	Email id
Presiding Officer	Ms. Varsha Gujarathi	varsha.gujarathi@universalsompo.com
Member	Mr. Sameer Prakash Patwardhan	Sameer.Patwardhan@universalsompo.com
Member	Ms. Arti Bhushan Mulik	arti.mulik@universalsompo.com
Member	Mr. Rishin Rai	rishin.rai@universalsompo.com
Member	Ms. Rajeshri Nakhwa	rnakhwa@universalsompo.com
Member	Ms. Sakshi Kirit Bhai Gohil	sakshi.gohil@universalsompo.com
Member	Mr. Mehul Belchada	mehul.belchada@universalsompo.com
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Member	Mr. Madhu Sudhanan N	madhu.n@universalsompo.com
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