

SEXUAL HARASSMENT POLICY

Version 1.2 (updated on 8th September, 2015)

Effective 18th May, 2015

IndiaCast Media Distribution Private Limited

(“the Company / IndiaCast Media”)



The Company follows the mandate of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (the “**Sexual Harassment Act**”) and has constituted a committee to deal with matters pertaining to sexual harassment at all workplaces of the Company. The constitution of company’s locations wise sexual harassment committees, referred to as “**Internal Complaints Committee**” or “**ICC**” is as below:

Internal Complaints Committee

1. Ms. Sheetal Mehra, Presiding Officer
2. Mr. Gagan Sareen, Member
3. Mr. Sanjay Jain , Member
4. Ms. Sonal Gupta, Member
5. Ms. Anagha Sarpotdar, External Member

What is sexual harassment?

Sexual harassment may exist where compensation or other employment benefits are conditioned on granting sexual favours. Sexual harassment may also consist of a pattern of unwelcome sexual advances or unwanted visual, verbal or physical conduct of a sexual nature.

To determine if your behaviour could be unwelcome to another person, remember that “unwelcome” is decided by the recipient of the behaviour, not the person doing the behaviour. Therefore, it is the impact of behaviour, not the intent of the person who did the behaviour that determines if harassment has occurred.

However, please note that the normal exercise of supervisory and management responsibilities, including coaching, performance reviews, work evaluation and disciplinary action does not constitute sexual harassment.

Specifically, sexual harassment constitutes the following:

- Verbal conduct such as epithets, derogatory jokes or comments, slurs or unwanted sexual advances, invitations or comments, questions about a person’s sexual practices, or gossiping about sexual relations, remarks about an individual’s body, colour, physical characteristics, or appearance;
- Visual conduct such as derogatory and/or sexually-oriented posters, offensive or obscene photography, cartoons, drawings or gestures, display of sexually suggestive or lewd objects;
- unwelcome notes or letters or emails, and any other written or graphic material that denigrates or shows hostility or aversion toward an individual because of a particular characteristic, that is placed on walls, bulletin boards, or elsewhere on IndiaCast Media’s premises or circulated in the workplace;
- Physical conduct such as physical interference with normal work, assault, unwanted touching, blocking normal movement or unwelcome physical contact, leering at a person’s body, and threatening, intimidating or hostile acts that relate to a particular characteristic;

- Retaliation for having reported or threatened to report harassment, or for opposing unlawful harassment, or for participating in an investigation;
- When submission to the conduct is made a term or condition of the individual's employment-either explicitly or implicitly

What to do if you have a complaint?

IndiaCast Media requires all employees to report immediately any incidents of sexual harassment or retaliation that they experience or observe regardless of the offender's identity or position. All claims will be promptly and thoroughly investigated.

Manner of reporting:

Sexual harassment cases will be dealt with in the manner prescribed under the Sexual Harassment Act. Any aggrieved employee can make a complaint of sexual harassment at the workplace, in writing, to the respective regional ICC or any member of the ICC, within a period of 3 months from the date of the alleged incident of sexual harassment, and in case of a series of incidents, within a period of 3 months from the last alleged incident of sexual harassment.

Email IDs of respective ICC and its members are:

ICC – IndiaCast [mail id - icc@indiacast.com]		
Ms. Sheetal Mehra	Presiding Officer	Sheetal.Mehra@indiacast.com
Mr. Gagan Sareen	Member	Gagan.Sareen@indiacast.com
Mr. Sanjay Jain	Member	Sanjay.Jain@indiacast.com
Ms. Sonal Gupta	Member	Sonal.Gupta@indiacast.com
Ms. Anagha Sarpotdar	Member	Anagha.sarpotdar@gmail.com

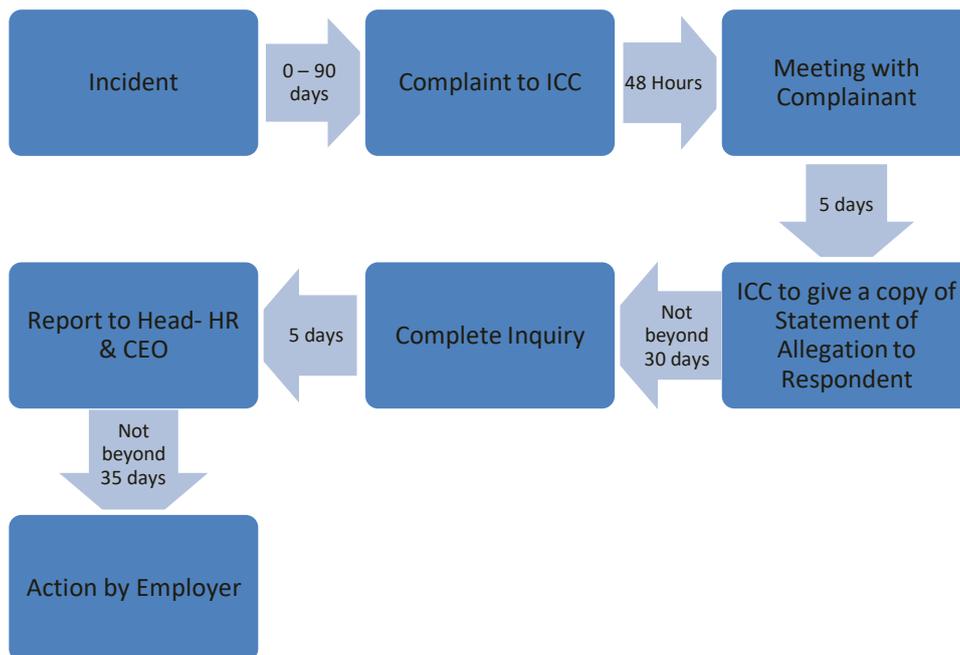
Where the aggrieved employee is not comfortable with making a complaint in writing, he/she may approach any member of the ICC, who will render all reasonable assistance to the aggrieved employee for making the complaint. The complaint should include details of the incident or incidents, names of the individuals involved and names of any witnesses. All such complaints will be investigated thoroughly by the ICC in the manner prescribed under the Sexual Harassment Act.

Redressal mechanism in case of sexual harassment complaints

Upon receiving a complaint, the ICC may take steps to settle the matter between the parties through conciliation, if requested by the complainant. In case conciliation is not possible or where it does not work out, the ICC will investigate the complaint in the manner prescribed under the Act, for which purpose it will meet as soon as is practicable, upon receiving the complaint. The committee shall have the powers to call any person and record their statements and make such investigation as may be necessary to decide as to the truth or falsity of the complaint. In the event there is a prima-facie case against the complainant, the committee may investigate the allegations and charges through the mechanism of a departmental enquiry, which shall be conducted in accordance with the principles of natural justice and in accordance with the provisions of the Act. In such a situation, the report of the committee shall be deemed to be the enquiry report under the disciplinary rules applicable to the employees. In the event

the committee comes to a conclusion that the complaint is true, it shall advise the CEO in writing on initiating disciplinary action. Thereafter, it shall be for the CEO to initiate disciplinary action and impose necessary punishment that may include the termination of services, depending on the gravity of the misconduct. However, if the committee receives a complaint which upon investigations is found to be false, appropriate disciplinary action and punishment may be imposed against the employee making the false complaint.

Process Milestones:



The Company strictly prohibits any sort of retaliation against the Complainant or any witnesses. Any act of reprisal, including internal interference, coercion and restraint, by the alleged offender whether directly or indirectly, will result in appropriate action against the alleged offender by the Company.

The Company will make every reasonable effort to maintain the confidentiality of all parties involved in any proceedings under this Policy. Information will be disclosed only to those having a need to know in order to facilitate the resolution. Any disclosure of information, other than on a need-to-know basis as described above, will constitute a breach of confidentiality and will result in disciplinary action, up to and including termination.

Any IndiaCast Media employee who violates this policy will be subject to disciplinary action, up to and including termination of employment. In addition, employees found to have engaged in unlawful harassment may be held personally liable for such conduct. This policy covers all managers, employees, consultants, independent contractors, vendors, clients, and other partners with whom IndiaCast Media conducts business.

The Company reserves its right to amend or modify this Policy in whole or in part, at any time without assigning any reason whatsoever.