

JANUARY 2021

# ANTI- HARASSMENT ANTI- BULLYING POLICY

PING DIGITAL  
OUTCUE MEDIA  
SPENDING AND POLICY RESEARCH FOUNDATION  
LIVE DATA VISUALISATION

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## INTRODUCTION

This policy policy to ensure that all its employees can work in an environment free from unlawful harassment, bullying, discrimination and retaliation. The Company will make every reasonable effort to ensure that all concerned are familiar with these policies and are aware that any complaint in violation of such policies will be investigated and resolved appropriately.

Our success is based on our people. We treat each other with respect and dignity and promote a sense of personal responsibility. We recruit competent and motivated people who respect our values, provide equal opportunities for their development and advancement; protect their privacy and **do not tolerate any form of harassment or discrimination.**

### OBJECTIVE

To provide protection against any form of bullying and harassment at the workplace and the prevention and redressal of complaints of harassment and matters related to it

### SCOPE AND COVERAGE

All full time, part time and contractual employees at the workplace.

The workplace may include but is not limited to:

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.

### APPLICABILITY

This policy is effective from **1<sup>st</sup> January 2021**. This policy will apply to existing employees and employees who may join in the future.

## DEFINITIONS

1. **Harassment** : Harassment is defined as verbal, written or physical conduct that denigrates or shows hostility or aversion toward an individual because of his or her race, colour, religion, sex, sexual orientation, gender identity or expression, national origin, age, disability, marital status, citizenship, genetic information, or any other characteristic protected by law, or that of his or her relatives, friends or associates, and that:

- a) has the purpose or effect of creating an intimidating, hostile or offensive work environment
- b) has the purpose or effect of unreasonably interfering with an individual's work performance
- c) otherwise adversely affects an individual's employment opportunities

Harassing conduct includes epithets, slurs or negative stereotyping; threatening, intimidating or hostile acts; denigrating jokes; and written or graphic material that denigrates or shows hostility or aversion toward an individual or group that is placed on walls or elsewhere on the employer's premises or circulated in the workplace, on company time or using company equipment by e-mail, phone

2. **Bullying** : Bullying is defined as repeated, health-harming mistreatment of one or more people by one or more perpetrators. It is abusive conduct that includes:

- Threatening, humiliating or intimidating behaviours
- Work interference/sabotage that prevents work from getting done
- Verbal abuse

Such behaviour violates the Company's Code of Ethics, which clearly states that all employees will be treated with dignity and respect.

The following types of behaviour are considered examples of bullying:

- a) **Verbal bullying** : Slandering, ridiculing or maligning a person or his or her family; persistent name-calling that is hurtful, insulting or humiliating; using a person as the subject of jokes; abusive and offensive remarks.
- b) **Physical bullying** : Pushing, shoving, kicking, poking, tripping, assault or threat of physical assault, damage to a person's work area or property.
- c) **Gesture bullying** : Nonverbal gestures that can convey threatening messages
- d) **Exclusion** : Socially or physically excluding or disregarding a person in work-related activities

In addition, the following examples may constitute or contribute to evidence of bullying in the workplace:

- Persistent singling out of one person
- Shouting or raising one's voice at an individual in public or in private
- Using obscene or intimidating gestures
- Not allowing the person to speak or express himself or herself (i.e., ignoring or interrupting)
- Personal insults and use of offensive nicknames
- Public humiliation in any form
- Constant criticism on matters unrelated or minimally related to the person's job performance or description
- Public reprimands
- Repeatedly accusing someone of errors that cannot be documented
- Deliberately interfering with mail and other communications
- Spreading rumours and gossip regarding individuals
- Encouraging others to disregard a supervisor's instructions
- Manipulating the ability of someone to do his or her work (e.g., overloading, underloading, withholding information, setting deadlines that cannot be met, giving deliberately ambiguous instructions)
- Assigning menial tasks not in keeping with the normal responsibilities of the job
- Taking credit for another person's ideas
- Refusing reasonable requests for leave in the absence of work-related reasons not to grant leave
- Deliberately excluding an individual or isolating him or her from work-related activities, such as meetings
- Unwanted physical contact, physical abuse or threats of abuse to an individual or an individual's property (defacing or marking up property)

Individuals who feel they have experienced bullying should report this to their Manager or to Human Resources before the conduct becomes severe or pervasive. All employees are strongly encouraged to report any bullying conduct they experience or witness as soon as possible to allow the Management to take appropriate action.

## LODGING A COMPLAINT

In the event that an employee is subject to any form of harassment or bullying, the incident must be reported to the reporting manager or HR immediately so that rapid and constructive action can be taken before relationships become irreparably strained.

The victim may adopt the following modes to file the complaint:

1. Contact their Manager or HR and request a meeting to record the incident
2. Write an official complaint via email to their Manager or HR

If the victim is unable to lodge a complaint due to any physical or mental incapacities, the following people are permitted to lodge the complaint on behalf of the aggrieved:

1. A legal heir
2. A relative, friend or co-worker
3. A Witness to the incident
4. A qualified psychologist/psychiatrist (in case of mental incapacities)

The investigation may include individual interviews with the parties involved and, where necessary, with individuals who may have observed the alleged conduct or may have other relevant knowledge.

The details of the complaint will be accurately recorded in the form of an incident report, and be handled with utmost confidentiality and sensitivity. Certain details, with the consent of the complainant, may be discussed/disclosed with the accused or witnesses in order to conduct further investigations.

Monetary settlements will NOT be considered as a basis of conciliation.

## PROCEEDINGS FOR RESOLUTION

Upon receipt of a complaint, the following measures may be adopted to manage the complaint:

### 1. Resolution through conciliation

The Company may attempt conciliation by hearing out both parties and eliminating any misinterpretation or misunderstandings. A detailed summary report must be prepared by the HR indicating further course of action. The report must:

- Be prepared using the complainant's own words as far as possible
- Be non-judgemental
- Be kept confidential

The Presiding Officer will review the incident and intervene if required to acquire more details on the incident. If conciliation is successful, a settlement that is acceptable to the aggrieved will be prepared by the Presiding Officer which is required to be signed by both parties.

The following may also have to be taken by either/both parties on the suggestion of the Management:

1. Prevention of Harassment at the Workplace Training
2. Counselling

Depending on the severity of the respondent's actions, the Management reserves the right to take measures that are in compliance with the law, which may include but is not limited to:

- Counselling
- Issuing a warning letter
- Revoke or withhold promotions, increments or any Company benefits
- Suspension without pay
- Immediate termination
- Reassignment

Retaliation against an individual for reporting harassment or discrimination or for participating in an investigation of a claim of harassment or discrimination is a serious violation of this policy and, like harassment or discrimination itself, will be subject to disciplinary action. Acts of retaliation should be reported immediately and will be promptly investigated and addressed.

## **PROVIDING INTERIM RELIEF TO THE AGGRIEVED**

In the interest of protecting the victim involved in the incident, the Management may consider the following measures to provide interim relief upon receiving a written request from the complainant:

- Counselling or therapy
- Transfer the aggrieved employee to another work location
- Transfer accused to another work location
- Re-assign the responsibility of assessing the aggrieved employee's work performance to another manager in case the accused is the direct manager/evaluator
- Grant any other such relief that the Management may be deem fit in the situation

A proposal of the recommendations for providing relief will be submitted which will be implemented within 1 week.

## **PUNISHMENT FOR FALSE OR MALICIOUS ALLEGATIONS**

Where the Management arrives at the conclusion that the allegation against the respondent is malicious or the aggrieved person making the complaint has made the complaint knowing it to be false or has produced any forged or misleading document, strict action against will be taken against the person making the complaint. These actions may be similar to the measures applicable if the respondent was found guilty.

## **ACKNOWLEDGEMENT OF THE ANTI HARASSMENT/ANTI BULLYING POLICY**

This policy is a guideline and the management reserves the right to withdraw / modify to suit the organization's philosophy or any new rule or regulation at any time without assigning any reason whatsoever.

I, the Employee, have read and understood the PoSH policy and will abide by the same as mandated by the Company.

Employee Name : \_\_\_\_\_

Date : \_\_\_\_\_

Signature : \_\_\_\_\_