

**Generali Central
Insurance Company Limited**



**Prevention, Prohibition and Redressal of
Sexual Harassment**

DOCUMENT SUMMARY

Title	Prevention, Prohibition and Redressal of Sexual Harassment Policy
GCI Classification	Internal Policy
Document code	GCI/P&O/25-26/17
Approved by	Akshaya Kashyap, Anup Rau
Effective date	24-Jul-25
Accountable Function	People & Organization
Key contact	akshaya.kashyap@generalicentral.in

CHANGE / HISTORY LOG

Version No.	Rollout Date	Changed by	Approved by	Purpose of revision
1	01-Oct-08		Deepak Sood	New Policy
2	01-Aug-14	Parag Pachpor	K.G. Krishnamoorthy Rao	The changes proposed are to align the existing policy with the provision of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013
2.1	01-Oct-20	Amitabh Mishra	Sunil Wariar, Anup Rau	Review and reformatting
2.2	01-Oct-23	Mamta Malpani Saboo	Akshaya Kashyap, Anup Rau	Review and rationalization of Policy
2.3	01-Apr-24	Jeevak Vavhal	Akshaya Kashyap, Anup Rau	Review and reformatting
2.4	24-Jul-25	Jeevak Vavhal	Akshaya Kashyap, Anup Rau	Change in company name and policy updates

REGULATORY REFERENCES

- Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013

INDEX

DEFINITIONS & ABBREVIATIONS	5
OBJECTIVES	6
SCOPE	6
ADOPTABLE MEASURES	6
1. Internal Committee.....	6
2. Complaint of Sexual Harassment.....	7
3. Conciliation:	7
4. Inquiry into Complaint.....	7
5. Action during pendency of Inquiry	9
6. Inquiry Report.....	9
7. Punishment for False or Malicious Complaint	9
8. Prohibition of Publication of the Complaint and the Proceedings.....	10
9. Penalty for publication or making known contents of complaint and inquiry proceedings.....	10
10. Adoptable Measures of the Company.....	10
11. Other Activities to be performed by the Committee	10
12. Overriding Effect	11
IMPLEMENTATION & COMMUNICATION.....	11
REVIEW PROCESS.....	11

DEFINITIONS & ABBREVIATIONS

Definitions:

“Sexual Harassment” means and includes anyone of the following unwelcome acts or behaviour (whether directly or by implication) namely: -

- a) Physical contact and advances; or
- b) A demand or request for sexual favors; or
- c) Making sexually colored remarks; or
- d) Showing pornography; or
- e) Any other unwelcome physical, verbal or non-verbal conduct of sexual nature;

Further, any of the following circumstances among other circumstances if it occurs or is present in relation to or connected with any act or behaviour of sexual harassment may amount to Sexual Harassment: -

- a) Implied or explicit promise of preferential treatment in her employment.
- b) Implied or explicit threat of detrimental treatment in her employment; or
- c) Implied or explicit threat about her present or future employment status; or
- d) Interference with her work or creating an intimidating or offensive or hostile work environment for her; or
- e) Humiliating treatment is likely to affect her health or safety.

“Aggrieved Woman” means-

- a) in relation to a workplace, a woman, of any age whether employed or not, who alleges to have been subjected to any act of sexual harassment by the respondent;
- b) in relation to dwelling place or house, a woman of any age who is employed in such a dwelling place or house;

“Presiding Officer” shall be a woman employed at a senior level at workplace from amongst the employees in case a senior level woman employee is not available, the Presiding Officer shall be nominated from other offices or administrative units of the workplace, in case the other offices or administrative units of the workplace do not have a senior level woman employee, the Presiding Officer shall be nominated from any other workplace of the same employer or other department or organization.

“Workplace” means the office premises wherein the employee is engaged by the Company or any place visited by the employee arising out of or during the course of employment including transportation, if any, provided by the Company for undertaking such journey.

"Employee" means a person employed with the Company 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 Company, 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;

“Respondent” means a person against whom the aggrieved woman has made a complaint of Sexual Harassment

“Administrative Unit” means all the offices falling under the supervision and control of the Head

Office of the Company and/or any other unit so defined under the policy for the time being in force.

Abbreviations:

CEO - Chief Executive Officer

NGO – Non-Government Organization

ICC – Internal Complaints Committee

ID – Identification Directory

OBJECTIVES

- Generali Central Insurance Company. Ltd. (hereinafter referred to as "The Company"), is committed in creating an atmosphere wherein all employees are able to work together in an environment free from sexual harassment. The Company continuously strives to create and promote a healthy working atmosphere at its workplace(s) and ensures that all woman Employees are protected from any Sexual Harassment.
- The Company believes that all employees, including persons dealing with the Company, have the right to be treated with dignity and respect. Sexual Harassment is an offence and is punishable according to the Sexual Harassment of Women at workplace (Prevention, Prohibition and Redressal) Act, 2013 ("the Act").
- This Policy will be known as "The Policy on Prevention, Prohibition and Redressal of Sexual Harassment" and shall extend to all the Employees of the Company. This policy is deemed to be incorporated in the service conditions/ Terms of Employment of all the Employees of the Company.

SCOPE

This policy specifically provides for prohibition of sexual harassment of women employees at Workplace, protection of women Employees of the Company against any act of Sexual Harassment committed against her, irrespective of whether Sexual Harassment is alleged to have taken place within or outside the Company premises and the procedure for redressal of any complaint in this matter.

ADOPTABLE MEASURES

1. Internal Committee:

- i. For the purpose of this Policy, an Internal Committee ("Internal Committee") should be constituted which shall comprise of the following members:
 - a. A women Presiding Officer from amongst the senior level employees of the Company.
 - b. Minimum two Members from amongst employees preferably committed to the cause of women or who have had experience in social work or have legal knowledge:
 - c. 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.
- ii. An Internal Committee shall be constituted by the Company under the direction of the Chief Executive Officer (CEO) of the Company for the administrative units. For the sake of brevity, it is clarified that in the event of a senior level woman Employee is not available to be appointed as Presiding Officer of the said committee at administrative unit the Presiding Officer shall be nominated amongst any department of such branch or administrative offices of the Company.
- iii. The term of the Presiding Officer and every Member of the Internal Committee shall be for a period of 3 years from the date of nomination by the Company. Provided that in case of any of the reasons to be recorded in writing the Committee may be reconstituted prior to the end of the said period of 3 years:

- a. Resignation by any of the Committee Members including the presiding Officer from the services of the Company.
 - b. Resignation by any of the Committee Members including the presiding officer from the position held in such committee.
 - c. In case of any valid objection raised by a complainant during the course of inquiry, regarding any of the committee members and/or presiding officer
 - d. The afore-mentioned reconstitution is a discretionary authority of the Chief Executive Officer of the Company.
- iv. Subject to what has been stated in sub-clause (i) of this Clause, the constitution of the Internal Committee shall be such that one half of the total members so nominated shall be women.
- v. If the Presiding Officer or any Member of the Internal Committee contravenes the following the provisions of this Policy or the Act, they shall be liable to be removed from the committee and vacancy so created shall be filled by fresh nomination in the manner prescribe under this policy.
- a. Publishes or makes known to the public through press and media in any manner the contents of the complaint i.e. Identity and the address of the aggrieved woman, respondent and witness or any information related to conciliation and inquiry proceedings, recommendation of Internal Committee or action taken by the Company.
 - b. Has been found guilty in any disciplinary proceedings or a disciplinary proceeding is pending against him.

2. Complaint of Sexual Harassment:

- a. Any aggrieved woman Employee may make a complaint in writing delivered either through post/courier/Fax/email and/or any other accepted mode of communication, of sexual harassment at Workplace by submitting six copies of the complaint to the respective Internal Complaints Committee, within a period of one year 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 the event, such complaint cannot be made in writing, the Presiding Officer or any member of the Internal Complaints Committee shall render all reasonable assistance to the aggrieved woman Employee for making the complaint in writing. The designated email ID for registering the said complaints shall be ICC_NonLife@generalicentral.in.
- b. Where the aggrieved woman 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 duly authorized on her behalf, may make a complaint as contemplated in clause 2 (a). viz.
 - (i) where the aggrieved woman is unable to make a complaint on account of her physical incapacity, a complaint may be filed by —
 - (a) her relative or friend; or
 - (b) her co-worker; or
 - (c) an officer of the Notional Commission for Women or State Women's Commission; or
 - (d) any person who has knowledge of the incident, with the written consent of the aggrieved woman.
 - (ii) where the aggrieved woman is unable to make a complaint on account of her mental incapacity, a complaint may be filed by-
 - (a) her relative or friend; or

- (b) a special educator; or
 - (c) a qualified psychiatrist or psychologist; or
 - (d) the guardian or authority under whose care she is receiving treatment or care; or
 - (e) any person who has knowledge of the incident 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.
- (iii) where the aggrieved woman for any other reason is unable to make a complaint, a complaint may be filed by any person who has knowledge of the incident, with her written consent;
- (iv) 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.
- c. It is further clarified that the Internal Complaints Committee may, for reasons recorded in writing, extend the time limit provided in clause (a) of this Section 4 for a further maximum period of 3 months, if it is satisfied that there existed circumstances which prevented the woman Employee from filing a complaint within the prescribed period.

3. Conciliation:

- a. The Internal Committee may, before initiating an inquiry and at the request of the aggrieved woman Employee take steps to settle the matter between her and the respondent through conciliation.
- b. No monetary settlement shall be made as a basis of conciliation.
- c. Where a settlement has been arrived, the Internal Committee shall record the settlement so arrived and forward the same to the Company to take action as specified in the recommendation.
- d. The Internal Committee shall provide the copies of the settlement as recorded to the aggrieved woman Employee and the respondent.
- e. Where a settlement is arrived between both the parties, no further inquiry shall be conducted by the Internal Committee. Where the terms or conditions of the settlement is not complied with by the respondent and the same comes to the knowledge of the Internal Complaints Committee, the Internal Committee shall proceed to make an inquiry into the complaint or forward the complaint to the police.

4. Inquiry into Complaint

- a. Subject to what has been stated in Clause 3 herein above, the Internal Committee shall inquire into the complaint in accordance with the provisions of the P&O policies applicable to the respondent or concerned Employee and where no such rules exist, in such manner as may be decided by the Internal Committee.
- b. The Committee shall have the powers to call for any of the employees who may be deemed to have the knowledge of the issue raised in the complaint under inquiry, to depose before the committee.
- c. The Committee shall further have the powers to call for and take into possession and document, instrument, system, electronic device(s) as it may deem necessary for the effective inquiry.
- d. All the proceedings before the committee shall be recorded in writing and copies, if any, desired shall be shared with the complainant and the concerned parties.
- e. The Committee shall complete the said inquiry within a period of 1 month from the date of receipt of the complaint. The Committee may however, with reasons specified in writing extend the said period. the collective period taken for inquiry shall in no case exceed 3 months.

- f. The parties shall, during the course of inquiry, be given an opportunity of being heard and a copy of the findings shall be made available to both the parties enabling them to make representation against the findings before the Internal Committee.

5. Action during pendency of Inquiry:

- a. During the pendency of an inquiry, on a written request made by the aggrieved woman employee, the Internal Committee, may recommend to the Company for the following:
 - Transfer the aggrieved woman or the respondent to any other workplace; or Grant leave to the aggrieved woman up to a period of three months; or
 - Grant such other relief to the aggrieved woman as the Internal Committee may deem fit.
- b. The leave granted to the aggrieved woman under this section shall be in addition to the leave she would be otherwise entitled
- c. On the recommendation of the Internal Committee, the Company shall implement the recommendations made and send the report for implementation to the Internal Complaints Committee.

6. Inquiry Report:

- a. On the completion of an inquiry, the Internal Committee, shall provide a report of its findings to the Company, within a period of ten days from the date of completion of the inquiry and such report shall also be made available to the concerned parties.
- b. Where the Internal Committee, arrives at the conclusion that the allegation against the respondent has not been proved, it shall recommend to the Company that no action is required to be taken in the matter.
- c. Where the Internal Committee arrives at the conclusion that the allegation against the respondent has been proved, it shall recommend to the Company –
 - (i) To take action for sexual harassment as a misconduct in accordance with the provisions of the P&O policies applicable to the respondent or where no such P&O policies have been made,
in such manner as the Internal Committee may deem fit;
 - (ii) To deduct, notwithstanding anything in the Services rules applicable to the respondent, from the salary or wages of the respondent such sum as it may determine and consider appropriate,
to be paid to the aggrieved woman or to her legal heirs. For the purpose of determination of the sums to be paid to the aggrieved woman Employee, the Internal Committee shall, take into consideration, the following factors: -
 - a. The mental trauma, pain, suffering and emotional distress caused to the aggrieved woman.
 - b. The loss in the career opportunity due to the incident of sexual harassment.
 - c. The income and financial status of the respondent.
 - d. Feasibility of such payment in lump sum or in instalments.

Provided that if the Company is unable to make such deduction from the salary of the respondent due to his being absent from duty or cessation of employment, the Company may direct to the respondent to pay such sum directly to the aggrieved woman Employee.

- d. In case the respondent fails to pay the sum contemplated in sub-clause (ii) in this Section, the Internal Committee may forward the order for recovery of the sum as an arrear of land revenue to the concerned District Officer.

- e. The Company shall act upon the recommendation of the Internal Committee within sixty days of the receipt of the report from the said Internal Committee.

7. Punishment for False or Malicious Complaint:

- a. If the Internal Committee concludes that allegation made against the respondent is malicious or the aggrieved woman has knowingly made a false complaint or produced a false or forged document to that effect, the Company may take action against the concerned women Employee or the person who has made such a complaint, in accordance with the provisions of the applicable P&O policies.
- b. If the Internal Committee arrives at a conclusion that any witness during the inquiry has given false evidence or produced forged or misleading documents, the Company may take action against the witness with the provisions of the applicable P&O policies.

8. Prohibition of Publication of the Complaint and the Proceedings:

- a. Any information regarding the identity, address, or the inquiry proceedings of the aggrieved women Employee, respondent or witness shall not be shared, published, communicated or made known to the media or any other third party in any manner.
- b. Provided that information may be disseminated regarding the justice secured to any victim of sexual harassment under this Act without disclosing the name, address, identity or any other particulars calculated to lead to the identification of the aggrieved woman and witnesses.

9. Penalty for publication or making known contents of complaint and inquiry proceedings:

Where any person entrusted with the duty to handle or deal with the complaint inquiry or any recommendations or action to be taken under the provisions of this Act, contravenes the provisions of section 8, he shall be liable for penalty in accordance with the provisions of the P&O policies applicable to the said person.

10. Adoptable Measures of the Company:

- a. Display at any conspicuous place in the Workplace, the penal consequences of Sexual Harassments
- b. Organize workshops and awareness programs at regular intervals for explaining the employees with the provisions of this Policy or the Act and orientation programs for the members of the Internal Committee
- c. Make such information available to the Internal Committee as they may require with regard to any complaint made.
- d. Treat Sexual Harassment as misconduct under the P&O policies and Company Code of Conduct and initiate action for such misconduct.
- e. The Company shall in its annual report include the number of cases filed and their disposal
- f. Provide assistance to the woman if she 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
- g. 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;
- h. Treat sexual harassment as a misconduct under the P&O policies and initiate action for such misconduct;
- i. Monitor the timely submission of reports by the Internal Committee.

11. Other Activities to be performed by the Committee:

a. Data maintenance and Reporting:

The Committee is also responsible for maintenance of data pertaining to complaints received by it; necessary actions initiated by it against the said complaints and the outcome of the said complaints and perform the activity of reporting the said information to the Statutory Authority designated by the Act for the same

b. Committee to submit annual report:

The Internal Committee shall in each calendar year prepare an annual report and submit the same to the Company and the District Officer before the due date. The report shall include the number of cases filed, if any, and their disposal.

12. Overriding Effect:

In the event of conflict between any provisions of this Policy and the Act, the provisions of the Act shall prevail.

IMPLEMENTATION & COMMUNICATION

- The Prevention, Prohibition and Redressal of Sexual Harassment Policy adopted by the Company in accordance with the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 is to be placed in the Employee Portal – GC Parivaar and updated regularly.
- Besides this periodic communication of the policy, processes and all the things that an employee need to know regarding the policy and its objectives, is to be done through emails, posters and mobile alerts.

REVIEW PROCESS

- The policy shall be reviewed once in three years or whenever felt necessary by the organization.
- The Organization reserves the right to interpret the meaning of this policy and such interpretation shall be final and binding upon all employees
- The Organization reserves the right to add, delete or modify any clause or any part thereof without assigning any reason.