





PlanetRead India Organizational Policies

This document outlines PlanetRead's organizational policies for the following areas, which are applicable to all people, programs and initiatives run by PlanetRead.

- 1. <u>Safeguarding Children</u>
- 2. Non-Discrimination and Equal Opportunities Policy
- 3. Safeguarding Women & Prohibition of Sexual Harassment
- 4. Conflict of Interest Policy
- 5. Anti-Bribery and Anti-Corruption Policy

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- 1. Safeguarding Children
- 1. Context

PlanetRead (PR) is fully committed to meeting the requirements of safeguarding children (younger than 18) it works with, to ensure that they are protected while enjoying opportunities to develop their full potential.

These guidelines are borrowed and adapted from similar policies developed by leading global educational institutions.¹ The Ministry of Women and Child Development's National Child Protection Policy and several Acts mentioned below have also influenced the content of this document:²

- Protection of Children from Sexual Offences Act, 2012
- The Information Technology Act, 2000
- Protection of Children from Sexual Offences Act, 2012
- Juvenile Justice Act, 2015
- Immoral Traffic (Prevention) Act 1956
- Human Trafficking (Section 370 & 370A IPC)
- Right of Children to Free and Compulsory Education Act, 2009
- Child Labour (Prohibition and Regulation) Amendment Act, 2016
- Prohibition of Child Marriage Act, 2006
- 2. Scope of Policy

This policy applies to all children (or minors) below the age of 18. PR is committed to supporting activities involving children and provides assurances to staff, visitors, external vendors, including contractual workers (from now on called "community members") that safeguarding children would be dealt with quickly and effectively. This policy applies to all members of the PR community who, while representing or serving PR or otherwise participating in a PR program, interact with children.

¹ Child safeguarding policies and protection policies include Stanford's

https://cardinalatwork.stanford.edu/working-stanford/policies/protection-minors/guidelines/guidelinesappropriate-behavior-minors, Harvard guidelines for interacting with Minors

https://hms.harvard.edu/sites/default/files/assets/Sites/HR/files/Guidelines%20for%20Interacting%20with%20Minors.pdf; Oxford

<u>https://www.ox.ac.uk/sites/files/oxford/field/field_document/Safeguarding%20code%20of%20practice.pdf;</u> Cambridge <u>https://www.hr.admin.cam.ac.uk/policies-procedures/children-and-adults-risk-safeguarding-policy;</u> Princeton <u>https://minorsoncampus.princeton.edu/policies/standards-behavior-minors</u>

² Draft National Child Policy on the Ministry of Women and Child Development's website. Accessed from: <u>https://wcd.nic.in/sites/default/files/Download%20File_1.pdf</u>





- 3. Guidelines for the community members protecting and safeguarding children include the following actions:
 - 1. All community members should treat children with empathy and respect, irrespective of race, colour, gender, language, religion, or national or ethnic origin.
 - 2. Community members should always be aware of the vulnerability of children and be particularly aware of maintaining appropriate physical, emotional, and sexual boundaries in such interactions.
 - 3. All adults must restrict electronic or social media communication with children to only program-related business purposes, whether conducted through email, text message, or any other form of electronic communication.
 - 4. Avoid language and behaviour that is inappropriate, harassing, abusive, sexually provocative, or demeaning.
 - 5. Members must act when there is evidence or reasonable cause to suspect that minors are being abused in any way, whether in a PR program or elsewhere in the premises.
 - 6. It is inappropriate for community members to have a physically or emotionally intimate relationship with a young person under 18. All members of the community on campus should refrain from abuse of "a position of trust."
 - 7. Members must maintain appropriate physical boundaries at all times. Adults shall not engage in any physical, sexual, verbal, or emotional abuse with a child.
 - 8. Do not engage in covert or overt sexual behaviours, including seductive speech, gestures, depictions, or physical contact that exploits, abuses or harasses a child in any way or exposes them to such treatment by another individual.
 - 9. Community members must only engage in one-on-one interactions with a child when necessary for the specific Program. Adults must not engage in inappropriate one-on-one interactions.
 - 10. Adults shall not tell a child to keep secrets from other program personnel, participants, and their parent/guardian.





- 11. Adults must not meet with children outside of established times for program activities. They must not provide transportation for a child in any vehicle when no other Adults or participants are in the vehicle, except in the event of an emergency.
- 12. Abuse is a form of maltreatment of a child. Abuse may be physical, emotional, sexual, or neglect and can be caused by another adult(s) or a child. One may abuse or neglect a child by inflicting harm or failing to prevent harm.
- 13. PR will have a designated member for ensuring that all procedures are in place to protect children and report any abuse or exploitation in line with this guideline.
- 14. Do seek advice from the designated lead person or authorities if you suspect an emotional or romantic relationship is developing, which may be an abuse of trust.
- 15. Do seek advice from the designated lead or authorities if a child tells you that they are being abused or describes experiences that you consider may be abuse.
- 16. Do not engage in any abusive behaviour, or in the presence of, a child, such as verbal abuse, striking, hitting, punching, poking, spanking, or restraining.
- 17. If the child requires immediate medical attention before appropriate authorities arrive, help the child in the best possible way but update the authorities (CHILDLINE 1098 and police) regarding the child's situation.
- 18. During at risk situation for children, provide accurate information about the child's location, details of the circumstances, and other relevant information to appropriate authorities (CHILDLINE 1098, and police).
- 19. Professionals involved in providing services to children (Staff, Counsellors, Health care providers) must follow Child safeguarding policies if they become concerned about their safety and welfare.
- 20. PR will work with all employees and vendors to ensure that they do not employ a minor, nor should they use child labour in any form.
- 21. PR Community members should not accept or give gifts to children without the knowledge of their parents or guardians.





- 22. Any entity engaged in research and data collection on children, or indirectly from parents/community, must ensure that children face no harm or trauma. All research staff should be trained on ethical practices, obtain relevant Institutional Review Board (IRB) approval for any planned research, and follow child safeguarding procedures.
- 4. Reporting and Investigating Abuse or Suspected Abuse
 - 1. Child abuse occurring within an organization, including physical, emotional and sexual abuse, is a serious offence that threatens the well-being and reputation of the child, the staff, and of the organization itself. All PR personnel are mandated reporters of suspected child abuse or exploitation to Childline and the Child Welfare Committee.
 - 2. Any person who has knowledge of a potential misconduct with regards to child protection involving PR personnel should immediately contact his or her immediate reporting manager or alternatively, PR's Child Protection Committee (CPC). Emails and contact numbers of the CPC members are available in this document and also made widely available in PR's offices and other employee guideline documents. The report should be made within 24 hours, when possible, to allow for a timely investigation and/or early intervention as needed. Failure to report suspected child abuse or misconduct may result in disciplinary action.
 - 3. The internal investigation, while respecting and prioritizing the privacy and rights of the child, will be initiated by the CPC within 48 hours after receiving the report. The investigation will be conducted by a committee constituted for this purpose by the management team.
 - 4. The investigation must be treated with care and sensitivity, as the child may fear retribution and punishment, and a staff member accused of child abuse may be concerned for his or her privacy and legal rights.
 - 5. An employee accused of abuse or misconduct with a child shall be temporarily suspended pending enquiry, with immediate effect, on receipt of the report. The employee shall be informed that charges have been made against him/her and given an opportunity to respond. The employee must also be informed that PR have an obligation to report the incident to Childline and/or local authorities like Police and Child Welfare Committee.





- 2. Non-Discrimination and Equal Opportunities Policy
 - 1. This Non-Discrimination and Equal Opportunities Policy ("Policy") states PR's internal policy of with regard to non-discrimination at the workplace and equal opportunities during recruitment.
 - 2. This Policy is internal to PR and is meant to provide a safe, diverse and comfortable workplace at PR. This Policy is not legally mandated and, therefore, is not judicially enforceable in India. This Policy is without prejudice to any anti-discrimination provisions of applicable law including, but not restricted to, the provisions of:
 - Article 17 of the Constitution of India;
 - the Protection of Civil Rights Act, 1955,
 - the Scheduled Castes and Scheduled Tribes (Prevention of Atrocities) Act, 1989;
 - the Sexual Harassment of Women at the Workplace (Prevention, Prohibition and Redressal) Act, 2013;
 - Sections 354 and 509 of the Indian Penal Code, 1860; and,
 - the Persons with Disabilities (Equal Opportunities, Protection of Rights and Full Participation) Act, 1995.

Non-discrimination

- 1. PR will not adversely discriminate, and prohibits other adverse discrimination at the workplace, on the basis of religion, race, caste, sex, place of birth, descent, sexual orientation, gender identity, disability, age or any of them ("Discrimination Characteristics"). PR will not condone any adverse discrimination against any person on its premises, whether that person is in its employment or otherwise.
- 2. Any person who believes himself or herself to have been subjected to adverse discrimination on the basis of the Discrimination Characteristics is encouraged to bring the matter to the attention of the Diversity Committee of PR at the earliest practical opportunity.

No person will be punished, retaliated against, or limited in employment or other opportunity for exercising anything set out in this Policy, or for filing a complaint, furnishing information for, or participating in an investigation, or any other activity related to the administration of this Policy.

3. Any adverse discrimination or other action or behaviour that constitutes a violation of law will be reported to the police.





- 1. PR provides equal opportunities to its employment, consultancy or otherwise without regard for the Discrimination Characteristics. All actions of PR with regard to its employees, consultants, advisors, interns and staff, including but not limited to those relating to compensation, benefits, transfers, leave, layoffs, training, education, and assistance, will be made without regard for the Discrimination Characteristics.
- 2. Notwithstanding anything contained in the previous paragraph, if PR reasonably believes that its employment, workplace or premises do not adequately represent the balance of diversity of persons who share one or more of the Discrimination Characteristics, it may, with the aim only of redressing that imbalance, take positive discriminatory action in respect of persons who share that aspect, or those aspects, of the Discrimination Characteristics that are sought to be adequately represented.
- 3. Any person who believes himself or herself to have been subjected to adverse discrimination, or impermissible positive discrimination, on the basis of the Discrimination Characteristics is encouraged to bring the matter to the attention of the Diversity Committee of PR at the earliest practical opportunity.





3. Safeguarding Women & Prohibition of Sexual Harassment

This page states PR's policies against sexual harassment of women at its workplaces. The Policy on Prohibition and Redressal of Sexual Harassment Against Women establishes the Internal Committee (IC) and deals with the definition, prohibition, prevention, and redressal of sexual harassment at its workplace. The names and contact details of the current members of the IC are also provided. Other applicable PR policies in this area include Workplace Fraternisation Policy and Guidelines for Interactions with Interns. All policies are published below.

For reporting complaints and information about an incident of harassment at PR or involving PR members, please contact any of the following Internal Committee members (IC) below. The IC recognizes that such reporting requires sharing of personal and sensitive information. The IC is an independent body at PR and is bound by strict rules to appropriately handle such information and maintain confidentiality — as described in the policy below.

Policy on Prohibition And Redressal of Sexual Harassment Against Women

- 1. This Policy on Prohibition and Redressal of Sexual Harassment Against Women ("Policy") states PlanetRead's ("PR") internal policy with regard to the definition, prohibition, prevention, and redressal of sexual harassment of women at its workplaces.
- 2. PR is committed to creating and maintaining a safe, secure and comfortable workplace, free from impropriety, indignity and fear, for all people at its workplace.
- 3. Accordingly, PR requires all members to undergo mandatory anti-sexual harassment training at regular intervals. PR shall also ensure that its management and staff remain attentive and responsive to the issue of sexual harassment at the workplace; and, that other people (interns, consultants, etc.) who are granted access to PR' workplace are made aware of this Policy.
- 4. Further, the PR Internal Committee (IC) is empowered to investigate complaints or allegations of sexual harassment against women and address them in a timely, impartial and sensitive manner.





- 4. Further, in an extraordinary situation where the PR management or the PR Board reasonably believes that there may be a case of sexual harassment pertaining to any current member of PR, including the Executive Director, and in the situation where the jurisdiction of the IC is unclear, PR commits to undertaking an investigation either at the executive, Board level, or through an independent third-party expert(s). PR is committed to ensuring the investigation is impartial and follows due process.
- 5. This Policy is without prejudice to the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 that was enacted into law on April 22, 2013. Sexual harassment of women, within or outside a workplace, is further defined and criminalized under section 354A of the Indian Penal Code, 1860.
- 6. What is Sexual Harassment? For the purposes of this Policy, sexual harassment, includes any one or more of the following unwelcome acts or behaviour, experienced by a woman, whether directly or by implication, committed in person/ on print or via computer/ phone/ other media:
 - i. physical contact and advances involving unwelcome and explicit sexual overtures;
 - ii. a demand or request for sexual favours;
 - iii. making obscene/ sexually coloured remarks or remarks of a obscene/ sexual nature about a woman's clothing or body;
 - iv. showing pornography, making or posting sexual pranks, sexual teasing;
 - v. repeatedly asking to socialize during off-duty hours or continued expressions of sexual/ romantic interest against a woman's wishes;
 - vi. deprecatory comments, conduct or any such behaviour based on the gender identity or sexual orientation of a woman;
 - vii. voyeurism; or stalking;
 - viii. any other unwelcome physical, verbal or non-verbal conduct of a sexual nature.
- 7. Further, occurrence of any of the following circumstances in relation to any sexually determined act or behaviour amounts to sexual harassment:
 - i. implied or explicit promise of preferential or detrimental treatment in employment;
 - ii. implied or explicit threat about present or future employment status;
 - iii. interference with the woman's work or creating an intimidating or offensive or hostile work environment; or
 - iv. humiliating treatment likely to affect the woman's health or safety.





- 8. If in pursuit of a legitimate professional objective or in the ordinary course of work, it is necessary to carry out any activity, including discussion, viewing, reading or other handling of issues or material related to sex, sexuality, pornography or other activities of a sexual nature, such activity will not amount to sexual harassment provided that care is taken to ensure that such activity is carried out in a professional, respectful and dignified manner.
- 9. Finally, it should be noted that the allegation of sexual harassment depends on the experience of the aggrieved woman, and not on the intentions of the respondent.
- 10. Who may Complain of Sexual Harassment? PR shall entertain complaints of sexual harassment from any individual where either the aggrieved woman is a member of PR or a third party, whether contractually employed at PR or not, allege to have been subject to sexual harassment at PR' workplace.
- 11. For the purposes of this policy, the 'aggrieved woman' means the woman who alleges to have been subject to sexual harassment; and the 'respondent' means a person against whom the aggrieved woman has filed a complaint under the provisions of this policy.
- 12. For the purposes of this policy, woman refers to persons self-identifying as women, including cisgender and transgender women.
- 13. Members may include any person engaged by PR for any work, whether of regular, temporary or ad hoc 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, intern or apprentice.
- 14. Accordingly, employees, whether on probation or permanent; staff; fellows; distinguished fellows; consultants; interns; board and society members are included as members of PR.
- 15. PR' workplace includes its offices in Pondicherry, Mumbai as well as any place or medium of interaction, nationally, internationally, and virtually, where the members visit in the broad context of their work, during the course of employment and/or arising out of any form of engagement with PR.

Internal Committee (IC)

PR's Internal Committee ("IC") constitutes:





How to Make a Complaint of Sexual Harassment?

An aggrieved woman who alleges to have been subject to an act of sexual harassment may submit a complaint directly, in writing, to any member of the IC. Alternatively, the aggrieved woman may email the complaint to the IC at <u>hr@planetread.org</u>, preferably from a non-organisational email account (for security purposes). If the aggrieved women is unable to send an email for whatever reason, then anyone nominated by the aggrieved women may file the complaint to the IC.

The complaint should be made 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:

- 1. Provided that where such complaint cannot be made in writing, the Presiding Officer or any member of the IC shall render all reasonable assistance to the woman for making the complaint in writing:
- 2. Provided further that the IC 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.
- 3. 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, relative, friend, co-worker, or any woman having the knowledge of the incident may make a complaint to the Presiding Officer of the IC or, subject to the following limitations:
 - i. The complaint should be made 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.

Provided further that the IC 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.

ii. Extraordinary situation: "Extraordinary situation" would include situations where the jurisdiction of the IC is unclear (for example, in cases where the limitation period has lapsed), including a potential case against the Executive Director.





- iii. In such situations, where the PR management or the PR Board reasonably believe that there may be a case of sexual harassment pertaining to any current member of PR, PR commits to undertaking an inquiry either at the executive, Board level, or through an independent third party. PR commits to ensuring the inquiry is impartial and follows due process.
- 4. It should be noted that in case of an allegation/ complaint against the Executive Director, an alternate remedy is also available to complainants under section 6(1) of the Sexual Harassment of Women at the Workplace Act, where the Local Committee is empowered to inquiry complaints. The complainant has the option of selecting either forum.
- 5. The external entity, in receiving, conducting inquiry into, disposing of, and otherwise handling, complaints, adheres to the procedure below, in proper compliance with the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013.

Receiving the Complaint

- 1. The IC shall take cognizance of the complaint at the earliest and in any case within ten working days of receiving the complaint. The Presiding Officer will constitute an Inquiry Committee of at least three IC members to conduct the inquiry and prepare the report.
- 2. A complete copy of the complaint and other supporting documents, including evidence and statements of witnesses shall be sent to the respondent within ten working days of receiving the complaint.
- 3. Upon receiving a copy of the complaint, the respondent shall submit his reply to the complaint to the Inquiry Committee, along with supporting documents within a period of ten working days.
- 4. The Inquiry Committee shall share the complete copy of the respondent's reply and the supporting documents, including evidence and statements of witnesses with the aggrieved woman within 10 working days of receiving it.

Resolution through Conciliation

- 1. Once the complaint and reply are received, before initiating the inquiry the IC may take steps to conciliate the complaint between the aggrieved woman and the respondent.
- 2. This shall be initiated only if requested by the aggrieved woman in writing.
- 3. It should be made clear to all parties that conciliation in itself doesn't necessarily mean acceptance of the complaint by the respondent.





It is a practical mechanism through which issues are resolved or misunderstandings cleared.

- 4. In case a settlement is arrived at, the IC will record and report the same to the Executive Director for taking appropriate action. If conciliation fails and/or no settlement is reached between the parties, the IC shall proceed to conduct a formal inquiry into the complaint.
- 5. The IC shall provide copies of the settlement to the aggrieved woman and the respondent. Once the action is implemented, no further inquiry is conducted.
- 6. If the respondent and/ or Executive Director fail to implement the terms of the settlement, the aggrieved woman may request the IC to conduct a formal inquiry into the complaint.
- 7. No monetary settlement shall be made as a basis of conciliation.

Conducting a Formal Inquiry

- 1. The IC commits to conducting a prompt, thorough, and impartial inquiry of a complaint as necessary and appropriate, in accordance with the principles of natural justice.
- 2. Upon receipt of a complaint, the Presiding Officer and two members shall at a meeting specially convened for this purpose, constitute from amongst its members a quorum of at least three members known as the Inquiry Committee to examine, conduct the inquiry, and prepare a report. The Inquiry Committee shall be notified to the parties prior to commencement of the inquiry and hearings, and will not be changed unless a situation mentioned in section 4(5) of the Act presents itself. Majority of the members of the Inquiry Committee shall be women.

The Inquiry Committee shall be subject to the following rules:

- 1. Both parties shall be given the opportunity to appear before the Inquiry Committee and present their case and/or submit names of any witnesses or documentary evidence substantiating their case.
- 2. The Inquiry Committee shall have the power to call upon any such witnesses and record their statements. The proceedings shall be conducted in such language as may be familiar to the aggrieved woman and the respondent.
- 3. Absent exceptional circumstances, the aggrieved woman and respondent should inform the Inquiry Committee in writing at least 24 hours in advance of the hearing the names of any witnesses he/she wishes to testify. Any information shared during a hearing is confidential.
- 4. An aggrieved woman or respondent shall not question each other or other witnesses directly but may raise questions to be asked of that party through the Inquiry Committee, which will determine whether to ask them.





- 5. The minutes of the proceedings shall be recorded in English and where the aggrieved woman or the respondent is not conversant with English, in addition, in such language as may be familiar to them.
- 6. If a party is not present for more than 3 consecutive hearings, without sufficient cause, the Inquiry Committee may, after giving that party a notice of 15 days, give an ex parte decision on the complaint or terminate the complaint.
- 7. The Inquiry Committee will make every effort to complete its inquiry within 90 days of a complaint of sexual harassment.
- 8. The Inquiry Report of the Inquiry Committee, including its decision and recommendations, and reasons for arriving at such a decision, shall be communicated to the concerned parties and the Executive Director, in writing, at the earliest and in any case within 10 working days of completion of the inquiry.
- 9. Notification of the decision and the reasons shall be individually communicated to the respondent and the aggrieved woman on the same day.
- 10. If the allegations against the respondent are proved to be true, the Inquiry Committee shall also recommend the penalties or corrective/restorative action that may be taken against him/ her to the Executive Director.
- 11. The Executive Director shall act on the recommendation of the Inquiry Committee within a period of 60 days from the date of the receipt of the Inquiry Report, unless an appeal against the findings is filed within that period by either party.

Interim Relief for the Aggrieved Woman

During the pendency of the inquiry, or during the pendency of the investigation by the police, on a written request made by the aggrieved woman or otherwise, the Inquiry Committee may recommend to the Executive Director to:

- Transfer the aggrieved woman or the respondent to any other workplace; or
- Suspend the respondent; ask them to work from home, or go on leave for the duration of the inquiry; or
- Grant leave to the aggrieved woman, for a period of three months maximum, in addition to the leave she would be otherwise entitled; or
- Prevent the respondent and/ or Executive Director from assessing the aggrieved woman's work performance; or





- Grant such other relief as may be appropriate including:
 - Pass an order restraining all communication between respondent and various PR members;
 - Pass an order restraining all communication between respondent and any PR member which is likely to influence the inquiry;
 - Any other measure to inspire confidence in various members of the workplace that PR is committed to providing a safe working environment.

Once the recommendations of interim relief are implemented, the Executive Director will inform the IC regarding the same.

The Inquiry Committee shall also suo motu examine the inherent power asymmetry and/or the vulnerability of the aggrieved woman in such cases and take steps to ensure that the aggrieved woman is not subjected to a hostile environment during the inquiry. These steps include, but are not limited to, directing the respondent to cease communication with the complainant or asking the respondent to work from home. The determination shall be done on a case-by-case basis.

A "hostile environment" is created when one's acts or behaviours with sexual undertones at a workplace creates an environment that is uncomfortable for the complainant which in turn could affect one's health and work performance or create an intimidating, hostile or offensive employment.

Malicious Allegations

Where the Inquiry Committee arrives at the conclusion that the allegation against the respondent is malicious, or the aggrieved woman or any other person making the complaint has made the complaint knowing it to be false, or the aggrieved woman or any other person making the complaint has produced any forged or misleading document, it may recommend to the Executive Director to take action against the aggrieved woman or the person making the complaint. This includes remedial and restorative steps of undertaking training or counselling, and coupled with proportionate actions including warning, suspension and disciplinary action, depending on the seriousness of the case.

While deciding malicious intent, the Inquiry Committee will consider that mere inability to substantiate a complaint need not mean malicious intent. Malicious intent must be clearly established through a separate inquiry.





Confidentiality

The identity of the aggrieved woman, respondent, witnesses, statements and other evidence obtained in the course of the inquiry process, recommendations of the IC, and action taken by the Executive Director are considered as confidential material, and will not be published or made known to the public or media.

Any woman contravening the confidentiality clause is subject to disciplinary action as prescribed in the Sexual Harassment of Women at Workplace Act (Prevention, Prohibition and Redressal) Act, 2013, wherever applicable.

Appeal

Any party not satisfied or further aggrieved by the decision of the IC, recommendations made by the IC or the implementation or non-implementation of such recommendations, may appeal to the appellate authority in accordance with the Sexual Harassment of Women at Workplace Act (Prevention, Prohibition and Redressal) Act, 2013, within 90 days of the recommendations being communicated, wherever applicable.

Prohibition of Retaliation

PR Members, including the Society and Board members, directors and management will not intimidate or take any retaliatory action (direct or indirect) against a woman who files a complaint or provides testimony/ evidence regarding a complaint in good faith.

Types of retaliation that are prohibited include but are not limited to:

(i) Intimidation;

(ii) Interference with the woman's work or creating an intimidating or offensive or hostile work environment;

- (iii) Termination of employment;
- (iv) Failing to hire or consider for hire or promotion; and

(iv) Adversely impacting working conditions or otherwise denying any employment benefit to an employee

Note that an adverse disciplinary action against a PR member whose conduct or performance warrants such action for reasons unrelated to the reporting of a complaint will not be deemed a violation of this clause.





Individuals who are concerned about retaliation should approach the Chief Administrative Officer (CAO) of the IC at <u>hr@planetread.org</u>. Such concerns will be addressed on priority.

A conclusion of malicious allegation made by the aggrieved woman shall be investigated by the Inquiry Committee as per clause 5.4 of this policy.

Workplace Fraternisation Policy

- 1. This policy applies to PR members, including permanent and temporary staff, consultants, Board and Society members, Fellows, individuals sharing the workplace, interns and any other person in a professional role in the organization.
- 2. 'Fraternization' for the purposes of this policy refers to consensual romantic or sexual relationships and interactions.
- 3. PR members in a supervisory or managerial position are expected to be strictly professional in their interactions with colleagues in junior positions owing to their capacity to affect decisions and conditions of employment of junior colleagues.
- 4. Romantic or sexual relationships and interactions that may develop between PR members across levels of hierarchy should be immediately disclosed by the senior PR member either to their immediate supervisor, or the programme Director, or a member of the senior staff team, with a request to be relieved from any direct or indirect supervisory role with respect to the junior PR member. This is to address concerns of favouritism, nepotism, misuse of authority, exploitation and sexual harassment that may potentially arise.
- 5. This policy also applies to interns. For further information, please see the separate policy on 'Guidelines on Interaction with Interns', below.
- 6. Failure to comply with this policy, including failure to disclose romantic or sexual relationships and interactions, especially in cases which lead to potential conflict of interest, or cause misuse of authority and harassment, will be treated as a serious violation of professional standards and will invite disciplinary action by the organisation.
- 7. PR recognizes that such disclosure entails sharing of information that is personal and sensitive in nature. Accordingly, the senior staff team is obligated to keep such information confidential and restrict it to the immediate chain of command, except in the instance of a disciplinary action or an IC inquiry.





The team must ensure that such disclosures do not have any adverse effects on conditions of employment of both parties involved, either.

- 8. This policy is also in accordance with PR' policy on Prohibition and Redressal of Sexual Harassment Against Women. Any instance of non-consensual romantic or sexual relationship or interactions between PR members, including those that result from misuse of authority amount to sexual harassment and will be subject to an IC inquiry and attract severe action up to and including suspension and termination of association or employment with PR.
- 9. PR is committed to creating a safe and harmonious working environment, and all members are encouraged to maintain professional standards of conduct at the workplace. This also includes being cognizant of personal interactions to ensure that it does not negatively impact work productivity, culture of teamwork, and comfort and safety of the working environment. Personal discussions or disputes in romantic or sexual relationships must be kept outside the workplace.
- 10. PR members must be respectful of privacy of colleagues in romantic relationships and refrain from monitoring any colleagues' behaviour or share personal information. Gossip, rumours, inappropriate jokes and comments are prohibited; and instances of such behaviour, if noticed, may be reported to any member of the senior staff and may invite disciplinary action.

Guidelines for Interactions with Interns

- PR interns are professionals occupying the PR workplace for a brief period, who do not enjoy full benefits and protections available to other PR members. Therefore, PR places a positive duty of care on all PR members to treat interns with utmost respect and professional support.
- 2. PR members, including permanent/temporary staff, consultants, board and society members, fellows, individuals sharing our workplace, and any other person in a potential supervisory role should be scrupulously professional and respectful in their interactions with interns, both at the workplace and outside it.
- 3. Any instance of unprofessional or disrespectful behaviour with interns will invite strict disciplinary action against PR members. PR' Workplace Fraternisation policy also applies to interns any romantic or intimate relationships that may develop between a PR member and an intern should be immediately disclosed by the PR member to the senior staff, with a request to be relieved from any direct or indirect supervisory role.





- 4. All interns are covered by PR' policy on Prevention of Sexual Harassment at the workplace. Any instance of non-consensual romantic/intimate relationships or interactions between a PR member and an intern, including those that result from misuse of authority may amount to misconduct and/or sexual harassment and be subject to inquiry and disciplinary action by senior staff
- 5. Failure to disclose a personal relationship with an intern will be treated as a serious violation of professional standards and will invite disciplinary action.





4. Conflict of Interest Policy

PlanetRead ("PR") has adopted this policy to avoid and mitigate any conflicts of interest. This Policy applies to all personnel of PR, including employees, directors, officers, consultants, or board members.

PR personnel should abstain from acting on the organization's behalf in matters where a conflict of interest exists or may arise. They should also endeavour to avoid any situation that might lead to or create a conflict of interest or the appearance of a conflict of interest. PR personnel should always perform their responsibilities in the best interests of the organization. PR personnel should be free from any undue influence that may benefit themselves or other third-parties when performing their duties.

A conflict of interest refers to a circumstance where an individual has a personal interest to the extent that it affects, directly or indirectly, the individual's performance of duties at or in relation to PR. Conflicts of interest may arise in the relations of personnel with third parties including persons and firms supplying goods and services to PR, competing or affinity organizations, donors and others supporting PR or family members, friends, and other employees.

Such an interest may arise through having ownership in any third party that deals with PR, holding office, serving on the board, participating in management, or being otherwise employed with any third party that deals with PR, receiving remuneration for services with respect to individual transactions involving PR, using PR's personnel and resources for other than PR-approved activities, programs, and purposes, or receiving personal gifts or loans from third parties dealing or competing with PR. Receipt of any gift is disapproved except gifts of a value less than INR 5000, which could not be refused without discourtesy. No personal gift of money should ever be accepted.

If any personnel seek to engage in a transaction in which a conflict of interest exists or may arise, they must first provide a written disclosure of the same to the board. The board shall determine whether a conflict exists and in the case of an existing conflict, whether the contemplated transaction may be authorized as just, fair, and reasonable. The decision of the board on this matter will rest in their sole discretion, and their concern must be the welfare of the organization and the advancement of its purpose.





5. Anti-Bribery and Anti-Corruption Policy

PlanetRead ("PR") is committed to maintaining the highest possible ethical standards in all its dealings and operations as an organization. It is PR's policy to comply with all applicable Anti-Bribery and Anti-Corruption laws including, but not limited to, the Prevention of Corruption Act (PCA), 1988 in India.

Accordingly, PR prohibits anyone acting on behalf of the organization from making or receiving improper payments, either directly or indirectly. Improper payments mean receiving or paying bribes or giving, offering, or promising to give money or anything else of value to any person or entity, whether to any government official or to a private entity, in order to improperly influence any act or decision of a person, or to otherwise gain an improper benefit for the organization.

The use of PR funds or assets for any illegal, improper, or unethical purpose is strictly prohibited. Compliance with this policy is required of all employees and/or sub-contractors of the organization. Any employee or sub-contractor who violates this policy in connection with PR's operations will be subject to disciplinary measures, up to and including termination in the case of an employee, or termination of business relations and suspension of contractual arrangements in the case of a sub-contractor and, where appropriate, referral of the matter to relevant law enforcement authorities.

An employee or sub-contractor who has information that this policy or related procedures may have been violated, or believes he or she is being asked to pay a bribe or receive a bribe, or otherwise act in contravention of this policy shall immediately report the event directly to the Chief Administrative Officer of PR. All such reporting will be treated confidentially, to the extent possible.

> Last updated: February 2024 Queries: <u>hr@planetread.org</u> or Mr. Parthibhan Amudhan, CAO, <u>parthibhan@planetread.org</u>