

# **Star Health and Allied Insurance Company Limited**

## **WORKPLACE ANTI- HARASSMENT POLICY**

**Version 1.0**

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## Document Summary

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|---------------------------------|----------------------------------|
| <b>Document Name:</b>           | Workplace Anti-Harassment Policy |
| <b>Current Version:</b>         | 1.0                              |
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## Revision History

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| 1.0        | Sep 22nd 2023             | Workplace Anti-Harassment Policy | Risk Management | CHRO, EXCOM | Board       |
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## Revision Details

| Change reference | Change details                  | Date           |
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| 1.0              | New Policy Created              | Sept 22, 2023  |
| 1.0              | Implementation for FY 2024 - 25 | April 30, 2024 |
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## A. INTRODUCTION

At Star Health and Allied and Insurance Co. Ltd, we are committed to maintaining a safe, respectful, and inclusive work environment for all employees. We firmly believe that every individual should be treated with dignity and respect, free from any form of harassment or discrimination. This workplace anti-harassment policy has been established to outline our stance on preventing and addressing harassment incidents and to provide a framework for promoting a culture of respect and professionalism within our company.

The purpose of this policy is to clearly define what constitutes workplace harassment, outline prohibited behaviours, and establish procedures for reporting, investigating, and addressing harassment complaints. This policy aims to protect the rights and well-being of all employees, contractors, clients, and visitors associated with Star Health and Allied and Insurance Co. Ltd. By implementing this policy, we are committed to fostering a work environment that is free from harassment, intimidation, and any behaviour that compromises the dignity of the individual.

## B. DEFINITION

Workplace harassment refers to any unwelcome or offensive behaviour, actions, or comments directed towards an individual or a group of individuals in a work setting. It involves any form of discrimination, intimidation, or mistreatment that creates a hostile, intimidating, or offensive work environment. Workplace harassment can occur due to various factors such as an individual's race, colour, gender, sexual orientation, religion, age, disability, origin, marital status, family status, etc. through any modes of communication.

Harassment can manifest in different forms, including but not limited to:

- **Verbal Harassment:** This involves the use of derogatory or offensive language, slurs, insults, or comments that belittle, demean, or humiliate a person or group.
- **Physical Harassment:** Physical harassment includes unwelcome physical contact, assault, unwanted advances, or any form of physical intimidation that causes discomfort or harm.
- **Sexual Harassment:** Sexual harassment is a specific type of harassment that encompasses unwelcome sexual advances, requests for sexual favours, or other verbal, non-verbal, or physical conduct of a sexual nature that interferes with an individual's work performance or creates a hostile work environment. POSH Policy will supersede in case the complaint reported as POSH Complaint.
- **Cyber Harassment:** With the advent of technology, harassment can also occur through digital channels, such as emails, text messages, social media platforms, or other online communication methods. Cyber harassment involves sending offensive or threatening messages, spreading rumours, or sharing explicit or private content without consent.

It is important to note that workplace harassment is not limited to these examples and can take various other forms. The above-mentioned forms and any other form of harassment is strictly prohibited.

## C. SCOPE

This workplace anti-harassment policy is applicable to all the employees, including full-time, part-time, temporary, and contract employees, as well as interns, volunteers, visitors, clients, vendor's employees and any other individuals who engage in business activities with Star Health and Allied and Insurance Co. Ltd. It covers all work-related locations, events, and activities, whether on-site or off-site, as well as virtual interactions, such as those conducted through electronic communication channels.

Complaints of sexual harassment brought forth by female employees are addressed and overseen according to the Policy on Sexual Harassment (POSH) of Employees at Workplace, which is subject to periodic amendments.

In accordance with our commitment to fostering an inclusive and respectful workplace environment, this anti-workplace harassment policy ensures gender neutrality. It is explicitly stated that harassment can be perpetrated by or directed towards any gender. Our organization is dedicated to addressing all forms of harassment and providing support to all individuals, regardless of their gender identity.

## D. REPORTING PROCEDURE

Star Health and Allied and Insurance Co. Ltd encourages individuals who have experienced or witnessed harassment to promptly report the incident at HR Desk at [hr.grievance@starhealth.in](mailto:hr.grievance@starhealth.in)

If comfortable, employees are encouraged to address the minor issue directly or involve a supervisor for amicable resolution.

## E. INVESTIGATION AND RESOLUTION

The investigation will involve:

- a) **Confidentiality:** All reports of harassment will be handled with sensitivity and confidentiality to the extent possible. The information shared during the investigation will be disclosed only to individuals involved in the resolution process on a need-to-know basis.
- b) **Investigation:** Upon receiving a complaint, HR will initiate a thorough and impartial investigation. The investigation may involve gathering statements from the complainant, the alleged harasser, and any relevant witnesses. HR investigator(s) will maintain objectivity, conducting interviews, and collecting evidence as necessary.
- c) **Interim Measures:** During the investigation, appropriate interim measures may be implemented to protect the complainant and prevent any further harassment. These measures may include reassignment, modified work schedules, temporary suspension or other reasonable accommodations.
- d) **Timeliness:** Every effort will be made to complete the investigation within a timeframe of 45 Days. However, the length of the investigation may vary depending on the complexity of the case and the availability of witnesses or evidence which can be extended basis the approval from Senior Management in the HR with the suitable justification, if breaching the timelines.
- e) **Findings:** Once the investigation is concluded, a determination will be made based on a preponderance of evidence standard (i.e., whether it is more likely than not that the alleged harassment occurred). The process will be executed as per the internal disciplinary action policy.
- f) **Disciplinary Action:** If it is determined that harassment has occurred and is proven, appropriate disciplinary action will be in terms of company's Service Rules 2006 with up to date amendments and company policies as applicable.

## **F. RETALIATION:**

Star Health has ZERO Tolerance towards any kind of Retaliation. Disciplinary measures in accordance with Company policy(s), which are subject to periodic amendments, will be enforced against any form of retaliation, efforts to establish a threatening or unfriendly atmosphere, or threats aimed at individuals filing workplace harassment complaints or aiding in the investigation.

## **G. FALSE OR MALICIOUS COMPLAINTS:**

In cases where evidence or circumstances indicate that a complaint was baseless or intended to harm, potential disciplinary measures may be proposed against the individual lodging the complaint, following the guidelines of the Company policy(s) that may be updated periodically.

## **H. TRAINING AND PREVENTION:**

HR Team will ensure to provide training and education programs to employees to raise awareness about harassment, its prevention, and the procedures for reporting complaints.

## **I. COMPLIANCE AND CONSEQUENCES**

Star Health and Allied and Insurance Co. Ltd will also comply with applicable laws and regulations. Creating a respectful work environment is a shared responsibility. By adhering to this workplace anti-harassment policy, we can foster an inclusive culture where everyone feels safe, valued, and empowered. Star Health and Allied and Insurance Co., is committed to regularly reviewing and updating this policy to ensure its effectiveness in preventing and addressing harassment.

## **J. PERIODIC REVIEW**

The policy shall be reviewed at least once annually and more frequently, where required, to ensure it remains up to date, relevant and aligned with the evolving landscape of social media platforms and user behaviour.