



JAGRAN PRAKASHAN GROUP OF COMPANIES

PREVENTION OF SEXUAL HARASSMENT POLICY

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Jagran Prakashan Group of Companies ('the Company' or 'JPL'), including Music Broadcast Ltd, Mid-day Info Media Ltd, Nai Dunia, Jagran Prakashan Ltd, Jagran New Media, Jagran Engage, Jagran Solutions and I Next, aims to provide a safe working environment and prohibits any form of sexual harassment. The purpose of this policy is to increase awareness and provide a safe working environment by prohibiting such occurrences.

The company shall abide by the law of the land espoused in the "The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013" ["the Act"] and "The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Rules, 2013" ["the Rules"] including any amendment or re-enactment thereof and the "Handbook on Sexual Harassment of Woman at Workplace (Prevention, Prohibition and Redressal) Act, 2013, issued by the Ministry of Women and Child Development in November 2015.

Refer to Annexure I for definitions of key terms used in the policy.

SCOPE AND APPLICABILITY

- All persons (male or female) employed at JPL (MUSIC BROADCAST LTD.) for any work on a regular, temporary, ad hoc or daily wage basis, either directly or through an agent, including a contractor, whether for remuneration or not, or working on a voluntary basis or otherwise and includes a co-worker, contract worker, probationer, trainee, apprentice or called by any other such name.
- Visitors at all business locations of JPL (MUSIC BROADCAST LTD.).
- The policy covers complaints of sexual harassment not only in the workplace, but also includes any place visited by the employee arising out of, or during the course of employment including transportation provided by the employer for undertaking such journey.

CONSEQUENCES OF POLICY VIOLATION

Any employee who engages in conduct determined to be sexual harassment or who encourages such conduct by others, shall be subjected to disciplinary action, as per the Company policies, which may include termination.

WHAT CONSTITUTES SEXUAL HARASSMENT

Under this policy 'Sexual Harassment' may be, any behaviour which is conventionally and by a common sense approach deemed as Sexual Harassment, including, any undesirable and/or unwelcome sexually oriented behaviour (whether explicit or implicit) and shall mean to include, without in any manner limiting the meaning or interpretations thereof:

- Physical contact and advances;
- A demand or request for sexual favours;
- Sexually coloured remarks;
- Showing pornography;
- Any other unwelcome physical, verbal or non-verbal conduct of sexual nature.

NATURE OF SEXUAL HARASSMENT

- Unwelcome sexual advances, requests or demand for sexual favours either explicitly or implicitly, in return for employment, promotion, examination or evaluation of a person towards any company activity;
- Unwelcome sexual advances involving verbal, non-verbal, or physical conduct such as sexually coloured remarks, jokes, letters, phone calls, e-mails, gestures, showing of pornography, lurid stares, physical contact or molestation, stalking, display of pictures, signs, verbal or non-verbal

communication which offends the individual sensibilities and affect her/his health, safety or performance;

- Eve teasing, innuendos and taunts, physical confinement against one's will and likely intrusion upon one's privacy;
- Act or conduct by a person in authority which creates the environment at workplace hostile or intimidating to a person belonging to the other sex;
- Conduct of such an act at work place or outside in relation to an Employee of JPL (MUSIC BROADCAST LTD.) or vice versa during the course of employment; or
- Any unwelcome gesture by an employee having sexual overtones

RESPONSIBILITY OF EMPLOYEES

EMPLOYEE GUIDELINES

The following are some of the guidelines that should be kept in mind in order to prevent sexual harassment at the workplace and to deal with such a situation, in case the need arises:

The employee –

- Should be aware of the behaviours that constitute sexual harassment as per the policy and be conscious of not engaging in any such behaviour or incidents at workplace.
- Should pay attention to the response of others in order to avoid unintentional offense.
- Should not assume that employees or co-workers enjoy or want to hear risqué jokes or sexually oriented comments about their appearance, or be touched, stared at, flirted with or propositioned for dates or sexual favours.
- Should not eavesdrop, intrude in others' personal lives, ask personal questions or make personal comments.
- Must be sensitive to individuals who may be offended by the verbal and / or non-verbal behaviour of others.
- Should understand that feedback, suggestions or warnings given to individuals on account of their work performance and work related behaviour may not amount to sexual harassment.
- Should understand that legitimate actions, management discretions and business processes such as transfer, demotion, disciplinary action, retrenchment, lay off, suspension, dismissal, reskilling, change in work assignment etc. should not be termed as sexual harassment unless a mala fide intent is involved.
- If unsure whether the behaviour is welcome, must ask.
- Must speak up and confront the respondent and mention that he/she is uncomfortable with that type of behaviour and it should stop.
- Must seek help from the Internal Committee (IC) or HR if in doubt or if any employee witnesses a concern.
- Must be supportive and assist the victim to report the concern.
- Should keep a record of incidents (dates, times, locations, possible witnesses and what happened). In case the complaint is not filed immediately, file a written complaint as soon as possible along with all the relevant details within a period of 3 months from the date of the incident of sexual harassment.

COMPLAINT REDRESSAL PROCEDURE

I. CONSTITUTION OF THE INTERNAL COMMITTEE:

The Management has constituted an Internal Committee ('IC') to address complaints of sexual harassment received from any aggrieved woman. Keeping with the guidelines of the Act, the IC shall comprise of the following members:

- i. The presiding officer who shall be a senior woman employee of the Company;
- ii. Not less than two members from amongst employees preferably committed to the cause of women or who have had experience in social work or have legal knowledge;
- iii. One external member from amongst non-governmental organisations or associations committed to the cause of women or a person familiar with the issues relating to sexual harassment.

Refer to Memorandum for list of IC members.

Note: Any complaint received from a male employee shall be addressed by the HR Department through the complaint redressal procedure established in the Company. Complaints from male employees will not be addressed by the Internal Committee (IC).

II. PROCEDURE FOR FILING A COMPLAINT FOR WOMEN EMPLOYEES

- i. Any aggrieved woman can lodge a complaint of sexual harassment in writing with either the presiding officer or any other member(s) of the IC within a period of 3 months from the date of the incident of sexual harassment, and in the event of a series of such incidents, within a period of 3 months from the date of the last incident.
- ii. The aggrieved woman is required to disclose her name, department, division and location where she is working, in the complaint to enable the presiding officer to contact her and take the matter forward.
- iii. Where a complaint cannot be made in writing, the presiding officer or any member of IC as the case may be, shall render all reasonable assistance to the aggrieved woman for making the complaint in writing.
- iv. It may be further noted that this policy requires the aggrieved woman to provide her name and contact details while filing a complaint, as anonymous complaints may not hold credibility and therefore may not be acted upon.
- v. A formal complaint can be lodged by the aggrieved woman in writing via email to any of the IC members or to the IC mailbox (posh@myradiocity.com) or can also be handwritten. The complaints should contain to the extent possible, any supporting evidence or data (if available) and the name(s) and address(es) of the witness(es), if any.

III. REDRESSAL PROCESS

- i. Every complaint reported under this policy shall be placed before the IC by the presiding officer or the member of IC within 3 days of its receipt.
- ii. If the complaint does not pertain to the nature of sexual harassment, the IC may determine to dismiss the complaint without further inquiry and inform the same to the aggrieved woman and the HR department.
- iii. Depending on the type and severity of the reported incident, as assessed by the IC, and after hearing the aggrieved woman and the respondent, a decision shall be taken by the IC as to whether or not to inquire further into the complaint and conduct an inquiry. In the event that the IC decides not to inquire into the complaint further, it shall record the reasons for doing so in writing and communicate the same to the aggrieved woman and the respondent.
- iv. The IC on determining that the complaint is covered under the purview of the act of sexual harassment shall conduct an inquiry which shall be completed within a period of 90 days.

Refer to Annexure - II for the Flow Chart for Sexual Harassment Complaint Process for Complaints Raised by Women.

- v. The IC shall conduct the proceedings in accordance with the principles of natural justice and in keeping with the Company's guidelines and the policy. It shall allow both the parties, a reasonable opportunity of presenting their case. However, should the accused choose not to participate in the proceedings, the IC shall continue ex parte.
- vi. The IC shall allow both the parties to produce relevant documents and witness(es) to support their case. Documents produced by either party shall be affixed with that party's signature to certify the document as original/ true copy.
- vii. The parties shall not be allowed to bring in any legal practitioner or any outside agency/ individual to represent them in their case at any stage of the proceedings before the IC.
- viii. In addition to the actions (based on employer-employee relationship) contemplated in this policy, the aggrieved shall at all times be at liberty to choose to proceed against the respondent in accordance with the law and the Company shall extend reasonable support to file a complaint.
- ix. The Management shall scrutinize the report and recommendations of the IC and take appropriate action to provide the victim with necessary psychological, emotional and physical support.
- x. In case of sexual harassment of any woman employee by any person not employed by JPL (MUSIC BROADCAST LTD.), the Management shall take all necessary and reasonable steps to assist the affected woman employee and render support where required.
- xi. The nature of disciplinary action recommended by the IC could depend on factors such as the type and degree of injury caused to the complainant, the impact of the violation on the institution as a whole, the position of the respondent in the power hierarchy and repetition of offence.

IV. POWERS OF THE INTERNAL COMMITTEE (IC)

- i. If the IC has a reason to believe that an employee is capable of furnishing relevant documents or information, it may direct such person to produce such document(s) or information, issue notice or summon the person; or call for such documents or information at such place and within such time as may be specified in a written notice.
- ii. Where any relevant document or information is recorded or stored by means of a mechanical, electronic or other device, the IC shall have the power to direct that the same be produced, or that a clear reproduction in writing of the same be produced.
- iii. Upon production of documents/ information called for by the IC, the IC shall have the power to (i) make copies of such documents / information or extracts; or (ii) retain such documents / information for such period as may be deemed necessary for purpose of the proceedings before it.
- iv. The IC shall have the power to issue interim directions to/ with regard to any person participating in the proceedings before it.
- v. For the purpose of making an inquiry, the IC shall have the same powers as are vested in a civil Court under the Code of Civil Procedure, 1908 when trying a suit in respect of (i) summoning and enforcing the attendance of any person and examining him on oath; and (ii) requiring the discovery and production of documents.

V. DECISION AND ACTION

- i. Once the inquiry is completed, the IC shall provide a report of its findings to the Management and the concerned parties.

If unsatisfied with the recommendations, either party may appeal to the Appellate Committee ("AC"). Refer to Memorandum for the list of AC members of JPL (MUSIC BROADCAST LTD.).

VI. FALSE/ MALICIOUS COMPLAINTS

- i. A separate inquiry will be conducted to understand if the charges filed by the aggrieved are malicious.
- ii. If on inquiry, it is proved that the allegation against the respondent is malicious, or the aggrieved person has filed a false/malicious complaint, or the aggrieved person or any other person has produced any forged or misleading document, it may recommend strict disciplinary action against such person.
- iii. However, the mere inability to substantiate a complaint or provide adequate proof need not attract action against the complainant.

VII. CONCILIATION

- i. If the aggrieved woman chooses to adopt the informal process to resolve her complaint/ experience of workplace sexual harassment, then it is the responsibility of the IC to counsel, educate, orient or warn the respondent to promptly stop the unwelcome behaviour or appoint a neutral person to act as a conciliator between the parties to resolve the complaint through conciliation.
- ii. The IC must also assess the severity of the situation and if necessary, advise and enable the complainant to opt for the formal route.
- iii. However, the choice of a formal process rests with the complainant even if the person responsible for managing the complaint believes that this can be resolved through an informal process.

VIII. CONFIDENTIALITY

- i. It is the duty of all employees to ensure that all complaints made under this policy and the information pertaining to it are sensitive and should be kept confidential.
- ii. All appropriate measures shall be taken to ensure confidentiality of the complaint and the inquiry by the IC shall be carried out in a manner conducive to such confidentiality.
- iii. At no time shall the contents of the complaint, the identity and address(es) of the aggrieved, the respondent and the witness(es), or any information relating to any conciliation proceedings or the inquiry process or the report and recommendations of the IC or the action taken pursuant thereto be published, communicated or made known to the public, press and media in any manner.
- iv. All records of complaints, including contents of meetings, results of inquiry and other relevant material shall be kept confidential by the Company except where disclosure is required under any applicable law.

IX. NON RETALIATION

- i. Regardless of the complaint and the outcome of the IC proceedings, the aggrieved woman, the witness and/or the respondent shall be protected against any retaliation.
- ii. If the complainant/ witness feel that he/she is facing retaliation by way of intimidation / pressure to withdraw the complaint or is receiving threat for complaining, or for testifying or otherwise participating in the inquiry, he/ she may report the matter to the Presiding Officer or any member(s) of the IC.
- iii. Any act of retaliation shall be treated as an act of harassment and appropriate disciplinary action shall be taken against the person(s) found to be committing such acts.
- iv. Individuals against whom harassment is reported, are strongly warned against taking any reprisal actions and are required to have no communication with the complainant during the period of the inquiry.

OWNERSHIP

Head of HR is the owner of this policy and is responsible for the overall implementation, execution and compliance of this policy document. The Company reserves the right to amend, abrogate, modify, and reinstate the entire policy or any part of it at any time, in accordance with the laws of India.

REVISION HISTORY

Version Number	Effective Date	Reviewed By	Approved By
JPL HR 1.0	16 November 2015	Jijo Johnson	Sagorika Kantharia
JPL HR 1.1	01 December 2016	Amrita Jha	Sagorika Kantharia
JPL HR 1.2	30 October 2019	Amrita Jha	Sagorika Kantharia
JPL HR 1.3	30 October 2020	Amrita Jha	Mona Tripathi Fiona Machado

ANNEXURES

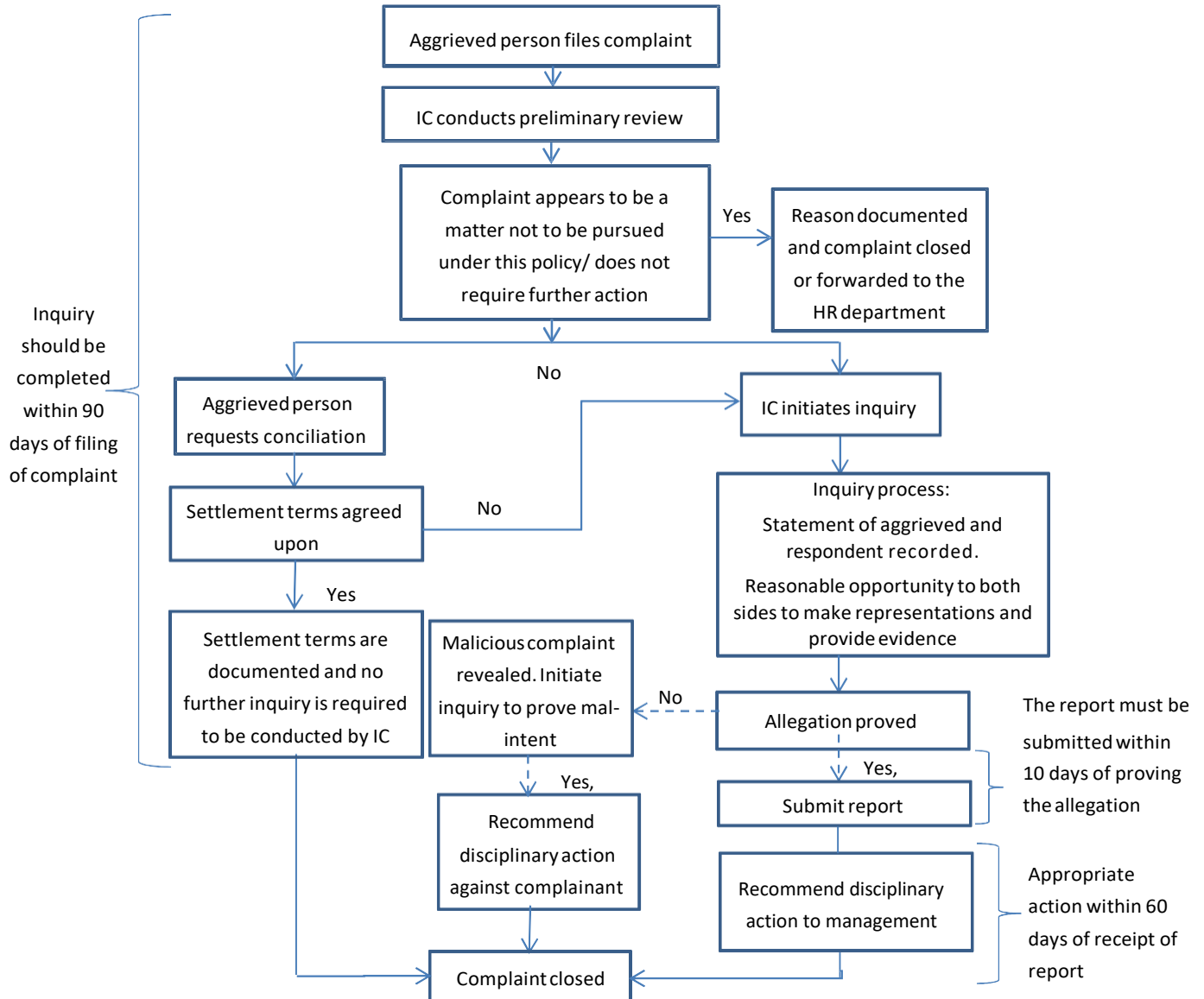
ANNEXURE I

DEFINITIONS

1. “Aggrieved” shall mean –
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.
2. “Employee” shall mean any person employed by JPL at a workplace for any work on regular, temporary, ad hoc or daily wage basis, either directly or through an agent, including a contractor, with or without 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 contractor worker, probationer, trainee, apprentice or called by any other such name.
3. “Employer / Company / JPL” shall mean JPL Group of Companies including Music Broadcast Ltd, Mid-day Info Media Ltd, Jagran Prakashan Ltd, Jagran New Media, Jagran Engage, Jagran Solutions and I Next.
4. “HR” refers to the Human Resources Department of JPL group of company.
5. “Management” refers the person or board or committee responsible for formulation and administration of policies for JPL, and also includes any person responsible for the management, supervision and control of the workplace.
6. “Respondent” shall mean any person against whom the aggrieved woman has made a complaint.
7. “The Act” shall mean The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and the rules made thereunder from time to time (including any statutory amendment or re-enactment thereof).

ANNEXURE - III

Flow Chart for Sexual Harassment Complaint Process for Complaints Raised by Women





JAGRAN PRAKASHAN GROUP OF COMPANIES

MEMORANDUM AS NOTIFIED UNDER PREVENTION OF SEXUAL HARASSMENT POLICY



A complaint can be sent to the IC mailbox (posh@myradiocity.com)

Zonal and Appellate Committee Members for your zone:

Central Committee Members

Serial No	Designation in Committee	Name of the Person	Designation	Mobile Number	Email ID
1	Presiding Officer	Sagorika Kantharia	Senior Executive Vice President	9820437252	sagorikak@myradiocity.com
2	Member	Avinash Nair	Senior Executive Vice President	9945877999	avinashn@myradiocity.com
3	Member	Anurita Patel	Executive Vice President	9769484829	anuritap@myradiocity.com
4	Outside Member	Poonam Atey	Lawyer	9718636340	poonamatey@gmail.com

West Committee Members

Serial No	Designation in Committee	Name of the Person	Designation	Mobile Number	Email ID
1	Presiding Officer	Roshni Rao	Senior Vice President	9892531055	roshnir@myradiocity.com
2	Member	Prashant Domadia	Senior Vice President	9004663130	prashantd@myradiocity.com
3	Member	Milli Shah	Senior Vice President	9892637837	millis@myradiocity.com
4	Member	Sanat Mishra	Executive Vice President	9820716154	sanatm@myradiocity.com
5	Member	Deepali Chavan	Senior Vice President	9822375794	deepalic@myradiocity.com
6	Outside Member	Poonam Atey	Lawyer	9718636340	poonamatey@gmail.com



North Committee Members					
Serial No	Designation in Committee	Name of the Person	Designation	Mobile Number	Email ID
1	Presiding Officer	Seema Soni	Senior Manager	9878490943	seemas@myradiocity.com
2	Member	Ravi Kumar Thakur	Executive Vice President	9711911911	ravit@myradiocity.com
3	Member	Abhinendra Tewari	Executive Vice President	9873136555	abhinendrat@myradiocity.com
4	Member	Kanupriya Agarwal	Associate Vice President	9810009341	kanupriyaa@myradiocity.com
5	Outside Member	Poonam Atey	Lawyer	9718636340	poonamatey@gmail.com

South Committee Members					
Serial No	Designation in Committee	Name of the Person	Designation	Mobile Number	Email ID
1	Presiding Officer	Sanskriti Ramgad	Deputy General Manager	8335896996	sanskritir@myradiocity.com
2	Member	Vinodan P	Senior Vice President	9686922228	vinodanp@myradiocity.com
3	Member	Bijoy Nair	Senior Vice President	9886149769	bijoy@myradiocity.com
4	Member	J. Maria Preethi	Deputy General Manager	9940198966	mariap@myradiocity.com
5	Outside Member	Poonam Atey	Lawyer	9718636340	poonamatey@gmail.com



East Committee Members

Serial No	Designation in Committee	Name of the Person	Designation	Mobile Number	Email ID
1	Presiding Officer	Iti Capoor	Senior Vice President	9838006396	itis@myradiocity.com
2	Member	Alok Deo Singh	General Manager	9534097080	alokd@myradiocity.com
3	Member	Vanita Kulshrestha	Vice President	9509592927	vanitak@myradiocity.com
4	Member	Anshul Munjal	Executive Vice President	9899060009	anshulm@myradiocity.com
5	Outside Member	Poonam Atey	Lawyer	9718636340	poonamatey@gmail.com

Appellate Committee Members

Serial No	Designation in Committee	Name of the Person	Designation	Contact Number	Email ID
1	Appellate Committee Member	Shailesh Gupta	Director – Jagran Group	022-68314800 (Ext 4899)	shailesh@jagran.com
2	Appellate Committee Member	Ashit Kukian	CEO – Music Broadcast Limited	022- 66969100 (Ext: 104)	ashitk@myradiocity.com
3	Appellate Committee Member	Rachna Kanwar	COO Digital	022-68314800 (Ext: 4884)	rachnak@myradiocity.com