



INTERNATIONAL CROPS RESEARCH
INSTITUTE FOR THE SEMI-ARID TROPICS

PREVENTION OF DISCRIMINATION AND HARASSMENT, INCLUDING SEXUAL HARASSMENT

The Institute is entitled to amend, suspend or rescind this policy at any time. Whilst the Institute has made all efforts to define detailed procedures for implementation of this policy, there may be occasions when certain matters are not addressed or there may be ambiguity in the procedures. Such difficulties or ambiguities will be resolved in line with the broad intent of the policy, by the Director General or Governing Board Chair (on a case to case basis). The Institute may also establish further rules and procedures, from time to time, to give effect to the intent of this policy and further the objective of good corporate governance.



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1. PREFACE

ICRISAT (“the Institute”) has adopted a Code of Ethics and Conduct (“the Code”), which lays down the principles and standards that govern the actions of the Institute and its workforce. Any actual or potential violation of the Code is matter of serious concern for the Institute.

ICRISAT places human dignity and respectful treatment at the center of our work. The Institute takes a zero-tolerance stance on exploitative and abusive relationships. Every ICRISAT workforce member has the right to be treated with dignity and respect and to be free from all forms of workplace discrimination and harassment, including sexual harassment.

2. OBJECTIVE

ICRISAT is committed to providing a safe and equitable work environment that:

- (a) Respects the dignity of individual workforce members;
- (b) Is free from of all forms of discrimination, including discrimination based on ethnic, social, or political background, color, nationality, religion, gender, age, disability, marital status, or sexual preferences; and
- (c) Is free from of all forms of workplace harassment, including sexual harassment.

In support of this commitment, the Institute takes:

- i. robust measures to protect the dignity of workforce members and to prevent discrimination or workplace harassment, including sexual harassment;
- ii. prompt action against those who commit any form of discrimination or workplace harassment, including sexual harassment. The Institute strongly encourages reporting and will ensure impartial investigation in accordance with ICRISAT’s Concern Resolution process.

3. POLICY

This Policy on the "Prevention of Discrimination and Harassment, including Sexual Harassment” (the Policy) aims to ensure that ICRISAT’s workplace is free from all forms of discrimination and harassment. All workforce members irrespective of their role, are expected to treat one another with courtesy and dignity and to act with sensitivity and respect at all times.

ICRISAT has separate forthcoming policies on the Prevention of Sexual Exploitation and Abuse, and on the Safeguarding of Children and Vulnerable Adults.

4. DEFINITIONS

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| Institute | International Crops Research Institute for the Semi-Arid Tropics (ICRISAT) |
| Disciplinary Action | Any action that can be taken on the completion of / during the investigation proceedings, including but not limited to a warning, imposition of fine, suspension from official duties or any such action as is deemed to be fit considering the gravity of the matter, in accordance with the Institute’s Disciplinary Procedures. |
| Disciplinary Procedures | Clause 16 - Disciplinary Procedures as stated in the Institute’s Personnel Policy Manual. |
| Dignity | The right of a person to be valued and respected for their own sake and to be treated ethically. |
| Respectful Treatment | Respectful treatment demonstrates, in judgement, actions and behaviors, a commitment to creating a work environment that encourages diverse perspectives and upholds the dignity of individuals. |

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| Workplace Harassment | <p>Any improper behavior and / or conduct by an individual that is directed at, and is offensive to, another individual or a group thereof and which the individual knew or ought reasonably to have known would be offensive or be perceived to cause offence or humiliation to another.</p> <p>It comprises objectionable or unacceptable conduct that demeans, belittles, abuses, intimidates or causes personal humiliation or embarrassment to an individual, and causes a hostile or offensive work environment.</p> |
| Sexual Harassment | <p>Sexual harassment is a particular form of harassment which includes unwanted sexual advances, requests for sexual favors or unwanted verbal or physical conduct or gestures of a sexual nature, or any other behaviour of a sexual nature (including pornography, sexually-coloured remarks) that has or might reasonably be expected or be perceived to cause offense or humiliation to another.</p> <p>It becomes even more severe when it is made a condition of employment either implicitly or explicitly or any other benefits or condition of career development or creates an intimidating, hostile or offensive environment. Any workforce member, irrespective of gender, can be either the injured party or the offender.</p> |
| Sexual Exploitation | <p>Any actual or attempted abuse by a workforce member of a position of vulnerability, differential power or trust for sexual purposes, including but not limited to, profiting momentarily, socially or politically from the sexual exploitation of another. Sexual exploitation includes, for example, transactional sex, solicitation of transactional sex, and exploitative relationships.</p> |
| Sexual Abuse | <p>Actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.</p> |
| Discrimination | <p>Discrimination is any distinction, exclusion, preference, or restriction based on, but not limited to, ethnic, social or political background, color, nationality, religion, gender, disability, or sexual preferences, where the purpose or result is to nullify or impair equal opportunity or treatment at work, such as hiring, working conditions, access to any employment benefit or condition, career development etc. Discrimination can be towards a single workforce member or group of workforce members. It may take the form of dismissive treatment or the expression of stereotypic assumptions about a group to which a person may belong.</p> <p>However, any distinction, exclusion or preference in respect of a particular job based on the inherent requirements thereof shall not be deemed to be discrimination.</p> |
| Wanted Experience | <p>A wanted, safe, legal, appropriate or open experience that causes positive feelings.</p> |
| Unwanted Experience | <p>An unwanted, unsafe, illegal or inappropriate experience that causes negative feelings including disempowerment, anger and/or sadness.</p> |
| Workforce | <p>Refers to particular individuals who have a contractual relationship with ICRISAT such as members of Regular Staff Cadres, members of the Non-Regular Special Assignments category, members of Short-term contracts, members of Job-contracts, Learner-Participants and Third-party contractors; regardless of their position, type of employment, or location.</p> |
| Concern(s) / Complaint(s) | <p>A concern or complaint raised via the Institute's Concern Line number or on the Case Management Tool made in good faith that discloses or demonstrates information that may evidence unethical or improper activity. Concern(s) / Complaint(s) / Protected Disclosure(s)/ Disclosure(s) should be factual and not speculative in nature.</p> |
| Subject | <p>A person or group of persons against, or in relation to whom, a Concern/ Complaint/ Protected Disclosure / Disclosure is made or evidence gathered during the course of an investigation under this Policy.</p> |

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| Complainant | Someone who raises a Concern / Complaint / Protected Disclosure / Disclosure under this Policy |
| Investigating Authority (IA) | For concerns of Discrimination and / or Workplace Harassment, including Sexual Harassment, the Investigating authority is the Director, Human Resources. |
| Inquiry Committee/ Committee | A group of individuals, appointed on an as-needed basis, by the Investigating authority on the Director General's approval, to assist the formal investigation. However, when the Governing Board, through the ARC Chair, is the Investigating authority, the Director General's approval is not required. The Director, Human Resources is the Investigating Authority for concern(s) or complaint(s) related to Workplace or Sexual Harassment / Discrimination/ Victimization/ Bullying. |
| Good Faith | A member of the workforce shall be deemed to be communicating in 'good faith' if there is a reasonable basis for communication of unethical practices or any other alleged wrongful conduct. Good faith shall be deemed lacking when the member of workforce does not have personal knowledge on a factual basis for the communication or where s/he knew or reasonably should have known that the communication about the unethical and improper practices or alleged wrongful conduct is malicious, false or frivolous. |
| Retaliation | A direct or indirect administrative decision and/or action that adversely affects the employment or working conditions of a Complainant. Such action is taken for the purpose of punishing, intimidating or injuring the Complainant because the individual has: <ul style="list-style-type: none"> • Reported suspected wrongdoing that implies a significant risk to the Institute; and/or • Cooperated with a duly authorized audit or an investigation of a report of wrongdoing. <p>Retaliation can include, without being limited to:</p> <ul style="list-style-type: none"> • Harassment; • Discrimination; • Unsubstantiated negative performance appraisals; • Unjustified contractual changes: termination, demotion, reassignment or transfer; • Unjustified modification of duties; • Unjustified non-authorization of holidays and other leave types; • Unjustified termination or compensation decreases, or poor work assignments or threats of physical harm • Malicious delays in authorizing travel, or the provision of entitlements; • Threat to the Complainant, their family and/or property including threats that may come from outside ICRISAT. <p>Retaliation will be treated as gross misconduct and is subject to appropriate disciplinary action, in accordance with the Institute's Disciplinary Procedures.</p> |
| Malicious reporting | Intentional malicious, false, bogus, misleading and/or unsubstantiated reporting of wrongdoing and transmission or dissemination of rumors without evidence or reasonable suspicions with the intention of harming another person's integrity or reputation. Following the prima facie review and /or formal investigation, if malicious reporting is established, the individual will be subject to disciplinary action, in accordance with the Institute's Disciplinary Procedures. |
| Workplace | Workplace includes ICRISAT premises, at locations where the Institute's work is being conducted, at Institute-sponsored industry/social events, and |

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| | while traveling, which includes the commute to work or at any other place where a person is representing ICRISAT. |
| Supervisor | The immediate supervisor of the ICRISAT workforce member. The Supervisor is primarily responsible for ensuring that the workforce member's work is delivered in line with the Institute's expectations, policies and procedures. |

5. **SCOPE**

This policy is applicable to all members of ICRISAT's workforce. It is applicable while working in ICRISAT premises, at locations where the Institute's work is being conducted, at Institute-sponsored industry/social events, and while traveling, which includes the commute to work or at any other place where a person is representing ICRISAT.

This Policy shall be read in conjunction with the documents and provisions referenced in the following Policies:

- Human Resource (HR) Policies including the Personnel Policy Manual (PPM) and the respective Personnel Administrative Manuals (PAMs);
- Code of Ethics and Conduct;
- Ethics and Safe Guarding Framework;
- Whistle blowing and Protection from Retaliation Policy;
- Forthcoming policy on Safeguarding Children and Vulnerable Adults;
- Forthcoming policy on the Prevention of Sexual Exploitation and Abuse;
- Concern Resolution Process; and
- Any other Institutional policy as applicable.

6. **GUIDING PRINCIPLES**

ICRISAT does not tolerate discrimination or harassment, including sexual harassment in the workplace or in any situation associated with the work performed on behalf of the Institute. ICRISAT places the highest priority on the prevention and elimination of discrimination and harassment in the workplace through awareness-raising and training.

In the event that harassment occurs, this Policy provides the means for formal and / or informal intervention, as outlined in the Concern Resolution Process and through appropriate Disciplinary Actions. All allegations of discrimination and harassment will be fully dealt with in a fair and prompt manner.

a. **Workplace Harassment:**

Workplace harassment is any improper behavior and / or conduct by a person that is directed at, and is offensive to, another individual or a group thereof and which the person knew or ought reasonably to have known would be offensive or be perceived to cause offence or humiliation to another.

It comprises objectionable or unacceptable conduct that demeans, belittles, abuses, intimidates or causes personal humiliation or embarrassment to an individual, and/or causes a hostile or offensive work environment.

Harassment may be deliberate, unsolicited, and/or coercive.

Mildly offensive or disruptive comments or behavior can rise to the level of harassment if they are repeated. A single incident can be considered harassment if it is so severe that it has a lasting negative impact on the individual(s) concerned.

b. Forms of Workplace Harassment:

Harassment may be present in different forms of words, gestures, electronic communication, or other actions and can take many different forms. It may include among others:

- Degrading tirades by a supervisor or colleague;
- Continual unjustified and unnecessary comments or deliberate insults related to a person's professional competence;
- Threatening, abusive or insulting comments, whether oral or written;
- Deliberate desecration of religious and/or national symbols;
- Malicious and unsubstantiated complaints of misconduct, against other workforce members;
- Mimicking, making fun of or belittling an individual;
- Continual interference with a person's work space, work materials, equipment, etc.;
- Continual and unfounded refusal of leave application or training;
- Threatening job loss without foundation;
- Deliberate assignment of tasks well beyond the individual's job responsibilities, without their consent;
- Continual exclusion of a person or group from normal communication, work or work related social activities; and/or
- Unreasonable intrusion into a person's private life, such as unnecessarily seeking to communicate with that person outside office hours or when they are at home, or repeatedly asking inappropriate questions about personal affairs.

c. Sexual Harassment:

Sexual harassment is a particular form of harassment which includes sexual advances, request for sexual favors or unwanted verbal or physical conduct or gestures of a sexual nature, or any other behaviour of a sexual nature (including pornography, sexually-coloured remarks) that has or that might reasonably be expected or be perceived to cause offense or humiliation to another.

Sexual harassment becomes even more severe when it is made a condition of employment either implicitly or explicitly or any other benefits or condition of career development or creates an intimidating, hostile or offensive environment. Any workforce member(s), irrespective of gender, can be either the injured party or the offender.

Sexual harassment can occur regardless of whether the harasser considers the behaviour to be offensive or not. Conduct becomes sexual harassment when it is forced upon a recipient against her/his will and the behaviour persists even where a reasonable person would understand that the behaviour is not welcome.

Mutually acceptable social behavior is not generally considered sexual harassment.

d. Forms of Sexual Harassment

Sexual harassment can take many different forms; it may include among others:

- Repetition of suggestive comments or innuendo;
- Exhibition of sexually-oriented material in the workplace;
- Display of sexually suggestive pictures, posters, electronic images, objects or written materials, which are offensive, obscene or objectionable;
- Taking photographs without the explicit permission or request of the person while they are alone or otherwise;
- Repeated and/or exaggerated compliments or comments about a colleague's personal appearance, or his/her physical features;
- Offensive flirtation or lewd remarks, comments on a person's sexual orientation, or remarks of a sexual nature, such as expressions of sexual interest that are addressed directly to the person;
- Continued suggestions or invitation for private or social activity(s), even after it has been made clear that such requests and suggestions are unwanted;

- Deliberate, unwanted, and unsolicited physical contact such as touching, patting, pinching or any other unsolicited physical contact, or unnecessarily close physical proximity (including invasion of personal space, getting too close for no reason, brushing against or cornering someone)
- Direct/Indirect propositions of a sexual nature;
- Intimidation, threats, blackmail for sexual favors;
- Asking for sexual submissions or making sexual advances to influence conditions of work/employment, promotion, professional development, etc.;
- Unwanted and inappropriate letters, telephone calls, emails or other forms of communications; and/or
- The use of crude or obscene language or sexually suggestive gestures, including sexually slanted obscene jokes or stories, sexually tinted remarks, staring, jokes causing or likely to cause awkwardness or embarrassment.

e. What does not constitute Harassment

Workforce members must have reasonable grounds before making a complaint of harassment.

All situations which appear to meet the definition ultimately may not be found to be instances of harassment. The key is whether or not the action was unwanted, particularly in light of whether the recipient asked the alleged harasser to stop such action, where this was possible.

Situations can be perceived as harassment because of differences in:

- **Power:** Individuals with power or authority may not be aware of the effect their behavior has on others. They may not know that a workforce member is afraid to speak up.
- **Culture:** A flattering comment in one culture may be very inappropriate in another culture.
- **Gender:** Women and men may define harassment differently.

As part of their duties, supervisors may make negative decisions (e.g., about performance or work assignments), which do not, in themselves, constitute harassment. Supervisors have a responsibility to give open, honest and constructive feedback, and to take appropriate corrective action. However, in doing so, such feedback and actions should not be used to demean workforce member or as retaliation.

f. Discrimination

Discrimination is any distinction, exclusion, preference, or restriction based on, but not limited to, ethnic, social or political background, color, nationality, religion, gender, disability, or sexual preferences, where the purpose or result is to nullify or impair equal opportunity or treatment at work, such as hiring, working conditions, access to any employment benefit or condition, career development etc.

Discrimination can be towards a single workforce member or group of workforce members. It may take the form of dismissive treatment or the expression of stereotypic assumptions about a group to which a person may belong.

Discrimination may be intentional or unintentional. It may involve direct actions that are discriminatory, or it may involve rules, practices or procedures that appear neutral, but disadvantage certain groups of people. Discrimination may take obvious forms, or it may occur in very subtle ways. Even if there are many factors affecting a decision or action, if discrimination is a factor, it is considered to be a violation of this Policy.

However, any distinction, exclusion or preference in respect of a particular job based on the inherent requirements thereof shall not be deemed to be discrimination.

g. Forms of Discrimination: Discrimination can take many different forms; it may include among others:

- **“Direct discrimination”** is when unequal treatment stems directly from policies, processes or practices making an explicit difference on one particular ground.

- “**Indirect discrimination**” refers to situations, policies, processes and practices which appear neutral, but which in practice lead to disadvantages primarily suffered by a specific category of persons. For example, requirements which are irrelevant for the job in question.

7. THE IMPACT OF WORKPLACE DISCRIMINATION OR HARASSMENT, INCLUDING SEXUAL HARASSMENT

In line with best practice, this Policy highlights the negative, far-reaching impacts of discrimination or harassment, including sexual harassment, in the workplace.

Discrimination and harassment have a negative impact on workplace productivity and human dignity. Such acts not only negatively impact the workforce member who is experiencing such actions, but also impacts those who are witnessing them.

7.1 A Workforce member experiencing discrimination or harassment may experience:

- Decreased work performance;
- Increased absenteeism;
- Gossip and scrutiny at work;
- Being objectified;
- A feeling of being demeaned, humiliated, embarrassed or offended;
- Defamation;
- Being ostracized;
- Negative job or career consequences; and/or
- A weakened support network

7.2 Co-workers witnessing discrimination or harassment may experience:

- Fear for their own safety;
- Decreased workplace morale;
- Denial and self-blame;
- Increased stress;
- Powerlessness;
- Conflict among co-workers; and/or
- Resentment towards the Institute

8. OBLIGATIONS OF WORKFORCE MEMBERS TO REPORT SUSPECTED HARASSMENT OR DISCRIMINATION

8.1 It is the duty of all members of the workforce to report any actual or suspected act of harassment or discrimination. An individual who makes such a report (Complainant) in good faith has the right to be protected against retaliation.

8.2 It is the duty of all members of the workforce to cooperate with investigations. An individual who cooperates in good faith with an investigation process has the right to be protected against retaliation.

8.3 Retaliation against individuals who have reported harassment or discrimination, or who have cooperated with investigations, is unacceptable.

8.4 It is the duty of ICRISAT to address suspected harassment or discrimination and to take:

- Effective measures to protect the Complainant from retaliation;
- Appropriate corrective action to remedy any retaliation against Complainant;

- Adequate disciplinary measures in cases of harassment or discrimination, including those making wrongful accusations; and
- Care to protect under this Policy any other Director/member of the workforce/Investigating authority, assisting in the said investigation against retaliation.

8.5 Complainants are not required or expected to act as investigators or fact finders, nor would they determine the appropriate corrective or remedial actions that may be warranted in a given case. Complainants should not act on their own in conducting any investigation activities, nor do they have the right to participate in any investigative activities other than as requested by the Investigating Authority or Inquiry Committee.

8.6 Accountabilities – Complainant

Complainants should:

- Bring to the early attention of the Institute any issues of workplace discrimination or harassment, including sexual harassment, of which they become aware;
- Consider avoiding anonymity when raising a concern, in the best interests of the investigation;
- Refer to the Institute’s Concern Resolution Process regarding the process for raising a complaint and consider the various available avenues;
- Co-operate with Investigating Authorities and the Inquiry Committee as needed, and maintain full confidentiality on the matter; and
- Avoid invoking their rights under this Policy to settle personal scores or to give vent to malicious intentions. The intent of this Policy is to bring genuine and serious workplace issues to the fore for prompt resolution. Malicious allegations by members of workforce will attract disciplinary action.

8.7 Accountabilities – Investigating Authority and Inquiry Committee

The Investigating Authority and the Inquiry Committee should:

- Conduct the inquiry in a fair, unbiased and timely manner;
- Ensure complete fact-finding;
- Maintain strict confidentiality, especially with regard to the whistleblower’s/ Complainant’s identity (if available);
- Reach an outcome to the investigation, to include whether an act of discrimination or harassment has been committed and if so by whom;
- Recommend an appropriate course of action to the Director General; and
- Record deliberations and document the final report for the record.

8.8 Accountabilities – Subject/Alleged Offender

The Subject/Alleged Offender should:

- Co-operate with the Investigating Authority and the Inquiry Committee as needed, and maintain full confidentiality on the matter;
- Not interfere with the investigation. Evidence shall not be withheld, destroyed or tampered with and witnesses shall not be influenced, coached, threatened or intimidated by the Subject(s); and
- Not intimidate or retaliate against the Complainant in any form.

9. RIGHTS OF THE COMPLAINANT AND THE SUBJECT

9.1 Rights of Complainant

In the case of an allegation of discrimination or harassment, a complainant has the right to:

- Be Heard. Complainants have the right to receive an empathetic attitude from the Investigating Authority and/or Inquiry Committee, in order to state her/ his grievance in a fearless environment;

- Receive information on the status of the investigation. The Investigating Authority keeps the Complainant /Whistleblower updated on the formal status of their case and of the conclusions of the preliminary review. The Complainant /Whistleblower will receive as much feedback as is appropriate under the circumstances, and subject to policy constraints, on the final outcome of the investigation;
- Ask for protection of their identity and disclosure only on their consent, in circumstances where it becomes a non-negotiable requirement for investigation;
- Report any kind of fear whether perceived or actual of intimidation or retaliation from the subject to the investigating authority;
- Present an appeal, where there is dissatisfaction with the recommendations/findings of the investigating authority.

9.2 Rights of Subject

In the case of an allegation of discrimination or harassment, a subject has the right to:

- Be heard. The investigating authority / inquiry committee must give adequate time and opportunity for the subject to communicate their perspectives;
- Be informed on the outcome of the investigation. Subjects shall be informed in writing by the Institute after the completion of the inquiry/ investigation process; and
- Present an appeal, where there is dissatisfaction with the recommendations/findings of the investigating authority.

Subjects have no right to ask for or be given information about the identity of the Complainant, even if it is available.

10. CONFIDENTIALITY

The identity of a Complainant, who comes forward for advice or to report in good faith on a suspected act of harassment or discrimination will be protected. Confidentiality will only be waived with the express consent of the Complainant, unless it is a case of clear and imminent danger to the subject or any other individual.

However, in some instances, identity may have to be disclosed, with the consent of the Complainant, to conduct a thorough investigation, to comply with the best practice investigating procedures, and to provide the accused with the appropriate and reasonable rights of defense. In the formal investigative process, strict confidentiality can only be maintained if the information provided confidentially can be corroborated independently.

11. ANONYMOUS COMPLAINTS OF HARASSMENT OR DISCRIMINATION

Complainants are encouraged to put their names to their complaints to aid appropriate investigation. However, individuals may wish to raise concerns anonymously.

Anonymous reports of wrongdoing are accepted either verbally through the Concern Line or in writing through the Case Management Tool (CMT) (as defined in the process under reporting). It is mandatory for anonymous reports of suspected wrongdoing to provide substantiated supportive evidence that allows confirmation of the background and likelihood of confirming the allegation from attributable sources. As outlined in ICRISAT's Concern Resolution Process, an anonymous complaint shall contain:

- The name of the alleged offender/subject;
- The date(s) and location of the alleged incident(s); and
- The names of witnesses and any physical and/or documentary proof, which corroborate the allegation (e.g. e-mails, text or voice messages, photos, letters etc.).

ICRISAT does not tolerate malicious reporting. A workforce member who makes a malicious report shall be subject to disciplinary actions as detailed in section 13 of this policy.

12. PROTECTION TO THE COMPLAINANT

As a result of reporting under this Policy, protection is available provided that:

- The Complainant has chosen to identify themselves;
- The complaint is made in good faith;
- The Complainant reasonably believes that the information, and any allegations contained in it, are substantially true;
- The complaint is not made with malicious intent; and
- The Complainant is not acting for personal gain.

The Investigating authority may exercise judgement to recommend, based on the seriousness, appropriate measures to the Director General to safeguard the interests of, and protect the Complainant from, retaliation at any time from the moment the Complainant comes forward. Protection measures are recommended in consultation with the Complainant and can include, without being limited to, the following, on a case-by-case basis:

- Temporary reassignment;
- Transfer to another office or function for which the Complainant is qualified;
- Placement on special leave with full pay; or
- Any other appropriate action on a case-by-case basis, including security measures.

A workforce member who has engaged in harassment or discrimination cannot avoid disciplinary action by reporting the misconduct and seeking protection under this Policy.

This Policy does not protect a workforce member from an adverse action which occurs independent of her/his disclosure under this policy, or for alleged wrongful conduct, poor job performance or any other disciplinary action, etc. unrelated to a disclosure made pursuant to this policy. Depending upon the circumstances, a workforce member's reporting and degree of cooperation may be taken into consideration in determining the appropriate disciplinary actions, in accordance with ICRISAT's Disciplinary Procedures.

13. MANAGEMENT ACTION ON FALSE DISCLOSURES

A member of the workforce who knowingly makes false allegations of discrimination or harassment, including sexual harassment, or who raises a protected disclosure to settle a personal grievance, shall be subject to disciplinary action, up to and including termination of employment, in accordance with ICRISAT's disciplinary procedures.

Further, this policy may not be used as a defense by a member of the workforce, against whom an adverse personnel action has been taken, independent of any disclosure made by them and for legitimate reasons or cause under Institute's rules and policies.

14. PROCEDURE FOR REPORTING SUSPECTED DISCRIMINATION AND / OR HARASSMENT, INCLUDING SEXUAL HARASSMENT

ICRISAT, through its Concern Resolution Process, provides multiple avenues to its workforce to raise complaints related to discrimination and harassment.

The Institute's Concern Resolution Process can be used to report multiple concerns including complaints of discrimination and harassment. The Process has 3 key elements: i) Seek advice and support, ii) Raise concern through the informal process, iii) Raise concern through the formal process. These elements are not in chronological order and a workforce member can choose not to seek advice and support and/or to directly raise a concern using the formal process.

Informal Process - After receiving advice, the workforce members can decide whether to pursue the concern or not. The workforce member may choose to deal with the complaint through either an informal or formal process.

However, individuals who suspect wrongdoing that implies a significant risk to ICRISAT's interests, reputation, operations or governance etc., and want to raise a protected disclosure, can only raise it through the formal process.

Formal Process - Any workforce member can formally register a concern verbally using the external Concern line (details are available in the Concern Resolution Process) by disclosing their identity or anonymously. Alternatively, the workforce members can formally register their concerns in writing through the external Case Management Tool by disclosing their identity or anonymously. Any concerns raised anonymously, via hard copy letter or email, will not be considered for investigation. Although, if the Complainant has disclosed their identity they will be encouraged to use Concern Line or Case Management Tool.

Once an individual raises a formal concern, depending on the nature of concern, it is allocated to an Investigating authority for review and investigation as detailed below:

| Table-1 Details of Investigating authority for different types of concerns | | |
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| Investigating Authority | Director Human Resource | Governing Board through Chair, Audit and Risk Committee (ARC) |
| Nature of Concern | <ol style="list-style-type: none"> 1. Breach of Code of Conduct/ breach of any organization policy of non-financial nature. 2. Workplace or Sexual Harassment / discrimination/ Victimization/ Bullying 3. Grievance | <ol style="list-style-type: none"> 1. Complaint / Protected Disclosure against Director, Human Resources / Head, Internal Audit / Director General / Deputy Director General - Research |

For further details on the procedure for reporting suspected discrimination and / or harassment, please refer to ICRISAT's Concern Resolution Process.

15. CONFLICT OF INTEREST

If an actual or potential conflict of interest exists, making it prudent for the investigating authority or member of an inquiry committee to recuse themselves from undertaking the preliminary *prima facie* review of a case, the Director, Human Resources will identify an alternative mechanism acceptable to the Whistleblower / Complainant.

16. AWARENESS-RAISING / TRAINING SESSIONS:

The ICRISAT Human Resource Services Unit provides periodical sessions for training and raising awareness on prevention of discrimination and harassment, including sexual harassment, in support of the implementation of this Policy.

17. REPORTING

Upon receipt of the formal concern, the investigating authority will provide the relevant details of the case to the Director General (DG), as per the Institute's Concern Resolution Process, unless the case involves the DG or the investigating authority (as defined in section 14 of this Policy).

Reporting to the Governing Board will be through the Chair of the Audit and Risk Committee. Additionally, an annual status report on the total number of complaints received under this Policy during the period, with a summary of the findings and the corrective actions taken, will be provided to the Governing Board by the investigating authority.

18. ACCESS TO RECORDS AND DOCUMENTS

All reports and records associated with 'Complaints' are considered confidential information and access will be restricted to the investigating authority, the inquiry committee (if applicable), Director General and the Governing Board as appropriate. 'Complaints' and any resulting investigations, reports or resulting actions will generally not be disclosed to the public except as may be required by any legal requirements or regulations or by any Institute policy/guidelines in place at that time.

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 Policy, contravenes the provisions, s/he shall be liable for suitable action as per ICRISAT's Disciplinary Procedures.

19. RETENTION OF DOCUMENTS

All Disclosures in writing or documented along with the results of investigation relating thereto shall be retained on the Case Management Tool and or by the Institute for a minimum period of seven (7) years.

20. MONITORING & REVISION

The Director, Human Resources, or their appointee, shall monitor, on behalf of the Institute, the operation of this Policy, including reviewing periodic summary reports, to be prepared on the number of complaints made under this policy to the Governing Board, the types of complaints made, the status of investigations of the reports, the results of completed investigations, and the details of corrective, punitive and preventive actions taken, if any.

This policy will be reviewed within a reasonable period, not longer than 3 years by the Director Human Resources.