

ASEEM INFRASTRUCTURE FINANCE LIMITED

Sexual Harassment (Prevention & Redressal) Policy

A. INTRODUCTION

This is the Policy of Aseem Infrastructure Finance Limited for prevention of sexual harassment at the workplace. All employees are expected to uphold the highest standards of ethical conduct at the workplace and in all their interactions with business stakeholders.

This means that employees have a responsibility to:

- Treat each other with dignity and respect;
- Follow the letter and spirit of law;
- Refrain from any unwelcome behavior that has sexual connotation (of sexual nature);
- Refrain from creating hostile atmosphere at workplace via sexual harassment; and
- Report sexual harassment experienced and/or witnessed to appropriate authorities and abide by the complaint handling procedure of the Organization.

This policy has been framed in accordance with the provisions of “the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013” and rules framed thereunder (hereinafter “the Act”).

Accordingly, while the Policy covers the key aspects of the Act, for any further clarification reference shall always be made to the Act and the provisions of the Act shall apply. If any aspect relating to sexual harassment not explicitly covered in this policy is provided for by the law, then the law will be applicable. In case of any conflict between the policy and the law, the law will prevail.

This Policy provides protection against sexual harassment of women at workplace and the prevention and redressal of complaints of sexual harassment and matters related to it.

SCOPE AND OBJECTIVE

The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and the rules made there under (“**Act**”) casts an obligation on all employers to have processes in place to prevent Sexual Harassment of Women at Workplace as well as to provide for redressal of complaints of Sexual Harassment.

Any person making unwelcome physical contact and explicit sexual overtures, demanding or requesting sexual favours, making sexually coloured remarks or showing pornography against the will of a person shall be guilty of the offence of Sexual Harassment and Section 354A of the Indian Penal Code 1860 (including any amendments or re-enactment thereof from time to time) or relevant provisions of Bharatiya Nyaya Sanhita (BNS), 2023 prescribes punishment for this offence, ranging from simple to

rigorous imprisonment, for term one year to three years, or with fine, or with both.

The right of women to protection from Sexual Harassment and the right to work with dignity are recognized as universal human rights by international conventions such as 'Convention on the Elimination of all Forms of Discrimination against Women' (CEDAW), which has been ratified by Government of India.

Aseem Infrastructure Finance Limited (the "**Company**" or "**AIFL**") is committed to create an environment that promotes and fosters equal employment opportunities. It is committed to create a safe and healthy working environment that enables its employees to work without fear of prejudice, gender bias and Sexual Harassment. Towards this, it is essential that all employees deal with their colleagues and third parties with fairness and respect, keeping in mind that his / her/ their behaviour can affect the internal and external reputation of the Company.

In order to prohibit, prevent and deter the commission of any act of Sexual Harassment at the Workplace and to provide the procedure for the redressal of complaints pertaining to Sexual Harassment, the Company has put in place this Sexual Harassment (Prevention and Redressal) Policy ("**Policy**") which reflects the Company's zero-tolerance to any form of prejudice, gender bias and Sexual Harassment at the Workplace.

This Policy applies to all Employees (as defined herein) of the Company.

B. KEY DEFINITIONS

1. "**Aggrieved Person**" in relation to a Workplace, means a person (woman, man or transgender), of any age, whether an Employee or not who alleges to have been subjected to any act of Sexual Harassment by the Respondent at the Workplace.
2. "**Complainant**" A Complainant includes any other person (woman, man or transgender) who files a complaint on behalf of an Aggrieved Person who is unable to make a complaint on account of their physical or mental incapacity or death or otherwise, provided that such other person has knowledge of the incident and other than in cases of mental incapacity or death, files the complaint with the written consent of the Aggrieved person.
3. "**Employee(s)**" means any person employed by the Company for any work on regular, temporary, *ad hoc* or daily wage basis, either directly or through an agent, with or without the knowledge of the principal employer, including people employed on deputation, contract, part-time basis, whether for remuneration or not, or working on voluntary basis or otherwise, whether the terms of employment are express or implied and shall include trainees, probationer, apprentice, consultants and any other person called by any other such name, who is working in the Workplace of the Company.
4. "**Internal Complaints Committee**" or "**IC**" means the Internal Committee constituted by the Company in accordance with the provisions of the Act, to which the complaint of Sexual Harassment can be filed by the Aggrieved person.

5. **“Respondent”** means a person against whom the aggrieved person has made a complaint of sexual harassment. The Respondent needs to be an employee of the Organisation.
6. **“Sexual Harassment”** means and includes any one or more of the following unwelcome acts or behaviour (whether directly or by implication) namely:-
 - i. physical contact and advances, including but not limited to touching, stalking, sounds which have explicit and /or implicit sexual connotation / overtures / overtones, molestation;
 - ii. a demand or request for sexual favours;
 - iii. making sexually coloured remarks, including but not limited to vulgar / indecent jokes, letters, phone calls, text messages, e-mails, gestures etc.;
 - iv. showing pornography or
 - v. any other unwelcome physical, verbal or non-verbal conduct of sexual nature.

The following circumstances, amongst others, if it occurs or is present in relation to or are connected with any act or behaviour of Sexual Harassment may amount to Sexual Harassment:

- i. implied or explicit promise of preferential treatment in employment;
- ii. implied or explicit threat of detrimental treatment in employment;
- iii. implied or explicit threat about present or future employment status;
- iv. interference with work or creating an intimidating or offensive or hostile work environment; or
- v. humiliating treatment likely to affect health or safety.

7. “Workplace” includes -

- i. all offices, branches or other premises established, owned or controlled by the Company where the Company’s business is conducted;
- ii. any other site, away from the Company’s premises, where any activities related to the Company are performed;
- iii. any place where social, business or other functions are performed in the course of work, where any conduct or comment passed will have an adverse impact on the Workplace or Workplace relations;
- iv. any place visited by the Employee arising out of or during the course of employment including transportation provided by the Company for undertaking such journey.

C. RESPONSIBILITY OF EMPLOYEES

It is the responsibility of all employees of the Company to respect the rights of others and to never encourage harassment. It can be done by:

- a) Refusing to participate in any activity which constitutes harassment
- b) Supporting the person to reject unwelcome behaviour
- c) Acting as a witness if the person being harassed decides to lodge a complaint
- d) It is also responsibility of employees to cooperate with the IC if and when called upon.

D. WHO CAN COMPLAIN?

A Complaint can be filed by an aggrieved person in writing in format provided by the Organisation (in Annexure B) or otherwise, as per the requirements as given under. The Act allows the following to file a complaint:

➤ **If the Aggrieved person is unable to make a complaint on account of her/his/their physical incapacity, a complaint may be filed by:**

- their relative or friend; or
- their co-worker; or
- an officer of the National Commission for Women or State Women's Commission; or
- any person who has knowledge of the incident, with the written consent of the Aggrieved person

➤ **If the Aggrieved person is unable to make a complaint on account of her/his/their mental incapacity, a complaint may be filed by:**

- their relative or friend;
- a special educator;
- a qualified psychiatrist or psychologist;
- the guardian or authority under whose care they are receiving treatment or care;
- any person who has knowledge of the incident jointly with the Aggrieved person's relative or friend or a special educator or qualified psychiatrist or psychologist,
- guardian or authority under whose care they are receiving treatment or care ; or
- any other person as provided under the Act or rules framed thereunder

○ In case of Complainant's death: Any person with knowledge of incident with written consent of her/his/their legal heir

○ In case complainant is unable to file the complaint for some other reason: By any person who has knowledge of the incident with her/his/their written consent.

Anonymous Complaints

Anyone can complain to the concerned authorities anonymously. BUT, anonymous complaints cannot be registered and inquired into. It will only act as a 'whistle blower' and help the authorities stay vigilant to such instances.

For the Committee to conduct an inquiry or for matter to be conciliated, it is important to know the name of the Complainant.

E. ESSENTIALS OF A COMPLAINT

- Name of the aggrieved, work, designation
- In case complainant is not able to file the complaint then the relationship with the complainant and the consent form along with the reason for incapacity of the complainant;

- Date of the incident(s)/last incident;
- Name of the alleged harasser, designation, working relationship with the complainant;
- Details of the incident;
- Documents or evidence in support; and
- Remedy sought.

It is always advised to give your complaint in written. A format for the same is available as Annexure B to this policy. When you make your complaint verbally, the IC shall transcribe the same in written. As a complainant you should sign at the complaint submitted.

F. WHOM TO COMPLAIN?

S. No.	Name of Member	Position in the Committee	Contact Details
1.	Shruti Trivedi	Presiding Officer	9819022217 shruti.trivedi@aseeminfra.in
2.	Nidhi Kothari	Internal Member	9999322560 nidhi.kothari@aseeminfra.in
3.	Nilesh Sampat	Internal Member	9833350905 nilesh.sampat@aseeminfra.in
4.	Dr. Medha Shetye	External Member	9869253508 medha@kelphr.com

G. CONSTITUTION OF INTERNAL COMPLAINTS COMMITTEE (IC) AND ITS FUNCTIONS

To prevent instances of sexual harassment and to receive and effectively deal with complaints pertaining to the same, an Internal Committee (IC) has been constituted for the Organisation. The details of the Committee is notified to all applicable persons of the location (workplace) and displayed at the office notice board and will be updated on a periodic basis

1. The IC shall comprise of the following members:
 - i. a presiding officer: A woman employed at a senior level in the organization or workplace
 - ii. Representative of HR of the Company
 - iii. One member from the employees committed to cause of women or having experience in social work/legal field
 - iv. One external member, familiar with the issues relating to sexual harassment
2. Atleast one-half of the total members so nominated shall be women.
3. The presiding officer and every member of the IC shall hold office for such period not exceeding three years, from the date of their nomination.
4. The external member shall be paid such fees or allowances for holding the proceedings of IC as may be deemed appropriate by the HR Head and as prescribed in the Act.

5. IC shall be responsible for
 - (a) Receiving complaints of sexual harassment at the workplace;
 - (b) Investigating every formal written complaint of Sexual Harassment in the workplace;
 - (c) Initiating and conducting inquiry as per the established procedure
 - (d) Submitting findings and recommendations of inquiries and implementing appropriate action
 - (e) Coordinating with the employer in implementing appropriate steps for prevention and prohibition of sexual harassment;
 - (f) Maintaining strict confidentiality throughout the process
 - (g) Submitting annual reports in the prescribed format;
 - (h) Collaborate with the HR/relevant department to ensure that enough training and communication is done on a regular basis;
 - (i) Propagate the values and culture of the organisation with respect to the gender diversity and acceptance;
 - (j) Walk the Talk - Ensure that one practices respect and equality in all respects at the workplace

6. IC shall be centrally constituted for all Employees of the Company and shall operate from the Corporate Office of the Company at 907, 9th floor, Godrej BKC, Avenue 3, G Block, Bandra Kurla Complex, Bandra (East) Mumbai - 400051. As and when required, the CEO and / or HR Head may constitute IC at such administrative units or offices of the Company as may be required.

7. An Aggrieved person with a Sexual Harassment concern may make a formal complaint to the IC in writing through letter addressed to "Presiding Officer – IC, AIFL, 907, 9th floor, Godrej BKC, Avenue 3, G Block, Bandra Kurla Complex, Bandra (East) Mumbai - 400051 or alternatively can send an email on IC@aseeminfra.in , within 3 months from the date of occurrence of the alleged incident and in the case of a series of incidents, within a period of 3 months from the date of the last incident. IC may, for reasons to be recorded in writing, extend the time limit not exceeding 3 (three) months, if it is satisfied that the circumstances were such which prevented the Aggrieved person/Complainant from filing the complaint within the aforesaid period.

8. Any vacancy can be filled by such persons as nominated by the CEO and approved by the Board of Directors of the Company.

H. PROCESS OF FILING A COMPLAINT AND REDRESSAL MECHANISM

The detailed process and redressal mechanism are provided in Annexure A at the end of this Policy.

I. RECORD KEEPING

IC shall keep complete and accurate documentation of the complaint, its investigation and the resolution thereof. The incident would be documented and copy of full report of IC will be kept with the HR Head.

J. CONFIDENTIALITY

The identity and addresses of the Aggrieved person, Respondent and witnesses, any information relating to conciliation and inquiry proceedings, recommendations of the IC and the action taken by the Company under the provisions of this Act shall not be published, communicated or made known to the public, press and media in any manner whatsoever. All Employees and witnesses who are part of the IC proceedings will need to sign confidentiality agreements. Any person found to be in breach of the confidentiality obligations provided herein and / or under the Act, as the case may be, shall be liable for the consequences of such breach as prescribed under the confidentiality agreements or as per applicable law. In addition, under the Act, the HR Head on behalf of the Company shall be entitled to recover Rs. 5,000 as penalty from any person who breaches the obligation of confidentiality.

Information may be disseminated regarding the justice secured to any victim of Sexual Harassment without disclosing the name, address, identity or any other particulars calculated to lead to the identification of the Aggrieved person and witnesses.

K. APPEAL

In the event that any person is aggrieved from the recommendations made by the IC or non-implementation of such recommendations, such person may appeal to the appropriate authority, as specified by the Act or otherwise specified under laws, within a period of 90 (ninety) days of the recommendations.

L. NON RETALIATION

While dealing with complaints of Sexual Harassment, the IC shall ensure that the Aggrieved person or the witness(es) are not victimized or discriminated against by the Respondent or by others at the behest of the Respondent.

Further, the Company does not tolerate retaliation in any form or manner against any Employee who, acting in good faith, reports suspected misconduct or raises concerns.

Any person who engages in such retaliation directly or indirectly, or encourages others to do so, may be subject to appropriate disciplinary action as per the terms of employment.

M. MALICIOUS COMPLAINTS OR FALSE EVIDENCE

This Policy has been evolved as a tool to ensure that in the interest of justice and fair play, our Employees have a forum to approach in the event of instances of Sexual Harassment. However, if on investigation it is revealed that the complaint was made with a malicious intent and with the motive of maligning the concerned individual / tarnishing his image in the Company or has produced any false evidence or forged or misleading documents and to settle personal / professional scores, strict action will be taken against the Aggrieved person in accordance with **Annexure A**.

In case the Aggrieved person is not able to substantiate the incident(s) with adequate proof and witnesses, such inability alone shall not render the complaint to be a false or malicious complaint.

N. COMPLAINTS HAVING ELEMENTS OF A CRIMINAL OFFENCE

The HR Head shall provide assistance to the Aggrieved person if the Aggrieved person chooses to file a complaint in relation to the offence under the IPC or any other law for the time being in force.

O. CONFLICT RESOLUTION

In case of any conflict between the provisions of this Policy and the Act, the provisions of the Act shall prevail. However, if the Policy provides for a behavioral standard higher than that envisaged under the Act, then the Employees of the Company shall adhere to such higher behavioral standards as part of their terms of employment.

P. ANNUAL REPORT UNDER POSH ACT AND DISCLOSURES

The IC shall prepare and submit the Annual Report as required under Section 21 of the Act and rules framed thereunder. The Company shall also disclose the details required under the Act and rules framed thereunder in its Board's Report.

Q. AMENDMENTS

The Company reserves the right to amend the Policy from time to time in order to comply with any applicable laws / rules / regulations that come into effect from time to time, in relation to Sexual Harassment and / or proceedings of the IC. Any such amendment shall be made by the HR Head and approved by the CEO of the Company. The same shall be noted at the next Board Meeting of the Company held after such amendment.

In case of any inconsistency between the provisions of law and this Policy, the provisions of the law shall prevail, and the Company shall abide by the applicable law. In case there are any changes in the applicable law, the Company shall comply with the applicable amended provisions.

Annexure A

DETAILED PROCESS AND REDRESSAL MECHANISM

Sr. No.	Process Description	Action Owner	Hand Over To
2.1.1	<p>An Aggrieved person / Complainant with a Sexual Harassment concern may make a formal complaint to the IC in writing through letter addressed to “Presiding Officer – IC, Aseem Infrastructure Finance Limited, 907, 9th Floor, Godrej BKC Avenue 3, G Block Bandra Kurla Complex, Bandra (East) Mumbai - 400051 ” or alternatively can send an email on IC@aseeminfra.in, within 3 (three) months from the date of occurrence of the alleged incident and in the case of a series of incidents, within a period of 3 (three) months from the date of the last incident. Provided that, a complaint may be accepted within such extended timeline as determined by the IC. The IC will neither accept nor entertain oral complaints under this Policy.</p> <p>Where such a complaint cannot be made in writing, any member of the IC shall render all reasonable assistance to the Complainant to reduce the complaint in writing and obtain the signature of the Complainant.</p> <p>Complainant shall submit to the IC, 6 (six) copies of the complaint along with supporting documents (if any), and name and contact details of the witnesses (if any).</p> <p>In case the complaint is against an IC member, then the Complainant may follow the procedure mentioned in this Policy except that the complaint will be filed directly to the HR Head instead of IC. The HR Head will then forward the complaint to the IC excluding the member involved in the complaint. In this case, the IC member involved in the complaint will be treated as the Respondent only and will have no say in the proceedings of the IC.</p>	Aggrieved person/ Complainant	Directly to the IC / HR Head

2.1.2	<p>IC shall then review the complaint and take one of the following actions –</p> <ul style="list-style-type: none"> i. <u>In the event, the complaint does not fall within the purview of Sexual Harassment;</u> the IC shall forward the complaint to HR Head for necessary action as per terms of employment. ii. <u>In case the complaint is identified as a Sexual Harassment case and any one party involved in the case is not an employee of the Company,</u> IC / HR Head will provide all assistance to the external agency / regulator / Police to resolve the case and the Company shall be in no way liable for any legal action from either of the party involved in the case. iii. <u>In case the complaint is identified as a Sexual Harassment case and the parties involved are employees of the Company,</u> IC shall send a copy of the complaint to the Respondent within 7 (seven) working days from the date of receipt of the complaint. 	IC	HR Head / Respondent
2.1.3	<p>The Respondent should file a reply to the IC along with the list of documents, and names and addresses of witness(es), if any, within a period not exceeding 10 (ten) working days from receipt of a copy of the complaint.</p>	Respondent	IC
2.1.4	<p>The IC may, before initiating an inquiry, at the request of the Aggrieved person Complainant take steps to settle the matter between the Aggrieved person / Complainant and the Respondent through conciliation. However, no monetary settlement shall be made on the basis of the conciliation. Where a settlement has been arrived at, the IC shall record the settlement so arrived at and forward the same to HR Head to take action as specified in the recommendation and shall provide copies of the settlement to the Aggrieved person Complainant and the Respondent. The copy of the settlement arrived at shall be kept in the safe custody of the HR Head.</p> <p>Post the conciliation process, after the settlement is arrived, the IC will not do further inquiry in the</p>	IC / HR Head / Conciliators	Aggrieved person / Complainant, Respondent and HR Head

	<p>complaint. Reasonable follow up shall be made with the Aggrieved person Complainant-by IC / HR Head.</p>		
2.1.5	<p>If the conciliation does not stop the behaviour and / or the Respondent fails to abide by the terms of the conciliation and / or at the request of the Aggrieved person - Complainant, the IC may commence an inquiry into the complaint or forward the complaint to the Police for necessary action.</p> <p>Provided, the IC may take a legal opinion, for deciding whether IC should forward the complaint to the Police.</p> <p>Inquiry to be conducted with a minimum of 3 (three) members of the IC, including the Presiding Officer. The Presiding Officer will preside over the investigation.</p> <p>For the purposes of the inquiry, the IC shall have all the powers conferred on it in accordance with the Act, including power to summon and enforce the attendance of any person and conduct an examination, request the discovery and production of documents and / or any other matter which may be prescribed and deemed necessary for the inquiry process.</p> <p>The IC shall make an inquiry into the complaint in accordance with the principles of natural justice. The IC must notify in writing, the time and dates of its meetings to the Aggrieved person / Complainant and the Respondent, not less than 5 (five) days in advance of any such meeting.</p> <p>The Aggrieved person / Complainant and the Respondent shall, during the course of the inquiry, be given the opportunity of being heard and copy of the findings shall be made available to both the parties enabling them to make representations against the findings before the IC.</p> <p>The IC has a right to terminate the inquiry proceedings or to give an ex-parte decision on the complaint if the Complainant/ Aggrieved person / Respondent fails, without sufficient cause to present himself or herself for 3 (three) consecutive hearings called by the Presiding Officer provided 15 (fifteen) days' advance written notice has been given to the party concerned.</p>	IC	Aggrieved person Complainant, Respondent, Lawyers and Police

	<p><u>Note:</u> Neither Aggrieved person / Complainant nor the Respondent can bring any legal practitioner to represent them in their case at any stage of the proceedings pending before IC. However, they may be accompanied by a colleague or family member for psychological or emotional support. Such colleague or family member will not be permitted to speak at or otherwise interfere with the proceedings of the IC.</p>		
2.1.6	<p>Pending inquiry, the IC at its discretion or at the written request of Aggrieved person / Complainant,-may decide to:</p> <p>a. Restrain the Respondent from taking decisions on the work performance of the Aggrieved person / Complainant or writing their confidential or appraisal report and shall assign the same to another officer</p> <p>b. Transfer the Aggrieved person /Complainant or the Respondent to any other Workplace of the Company.</p> <p>c. Grant leave to the Aggrieved person / Complainant up to 3 (three) months. This leave shall be in addition to the leave the Aggrieved person / Complainant would be otherwise entitled to under the terms of employment.</p> <p>Issue a restraint order to warn the Respondent that any attempt on his part, or by person(s) acting on his behalf, to contact or influence, or intimidate, or exert pressure on the Complainant or witnesses may prove prejudicial to his case.</p>	IC	Complainant/ Aggrieved person Woman and Respondent
2.1.7	<p>The inquiry should be completed within a period of 90 (ninety) days, or such extended period as may be permitted under applicable law, from the day when complaint was filed by the Aggrieved person.</p> <p>On completion of the inquiry, report of the findings shall be submitted by the IC to the HR Head, Aggrieved person / Complainant and Respondent within 10 (ten) days of completion of the inquiry.</p> <p>If the complaint against the Respondent is not proved to be true then it shall be recommended that 'No Action' is required to be taken in the matter.</p> <p>The IC may recommend to HR Head any one or combination of the following actions based on</p>	IC and HR Head	IC, HR Head, Complainant / Aggrieved person and Respondent

severity of the Sexual Harassment and its impact on the Aggrieved person:

1. Written Apology,
2. Reprimand or censure,
3. Warning,
4. Assistance by the Company to the Aggrieved person/Complainant in filing the relevant complaint before the concerned law enforcement agency, if requested,
5. Transfer the Aggrieved person /Complainant or Respondent,
6. Withholding of Promotion or Increments of the Respondent,
7. Termination of employment of the Respondent,
8. Suspension,
9. Respondent to be made to attend counselling sessions,
10. Deduction of such sum from the salary / wages of the Respondent as the IC may deem appropriate to be paid to the Aggrieved person / Complainant or to the legal heirs,
11. Carrying out community service,
12. Any other action as may be deemed appropriate by the IC.

The above list is inclusive and not exhaustive.

In case the IC has recommended in its report that deduction be made for the salary / wages of the Respondent as envisaged above and the Designated HR Head is unable to make such deduction due to his being absent from duty or cessation of employment, the IC may direct the Respondent to pay such sum to the Aggrieved person / Complainant. In case the Respondent fails to pay the sum referred above, the IC may forward the order for recovery of the sum as an arrear of land revenue to the concerned District Officer.


Upon receipt of the IC report, HR Head will inform about the same to the CEO of the Company. HR Head shall act upon the recommendations within 60 (sixty) days of receipt of the IC report and send a report of such implementation to the IC and the CEO of the Company.

2.1.8	In cases where the IC arrives at a conclusion that the complaint was false or malicious or false or misleading documents were produced, then the IC may recommend that the HR Head take action in accordance with the provisions of the terms of employment or any action as per point 2.1.7 above.	IC	HR Head
2.1.9	The number of complaints of Sexual Harassment received, disposed off, pending for more than 90 (ninety) days, workshops conducted, action taken in the year need to be filed as Annual Report to the concerned District Officer and HR Head under Section 21 of the Act.	IC	Deputy Collector ² and HR Head
2.1.10	The Company shall include in its Annual Report, the number of Sexual Harassment cases filed, if any, and their disposal under the Act.	HR Head	Registrar of Companies

²In Maharashtra, the District Officer would be the Deputy Collector of the concerned district.

Duties of IC / Company / HR Head -

Sr. No.	Process Description	Action Owner	Hand Over To
2.2.1	IC members will hold the office for 3 (three) years from the date of their nomination to the IC.	HR Head	-
2.2.2	Disseminate this Policy and create awareness sessions for the Employees	HR Head	Employees
2.2.3	Orientation & Capacity/Skill building program for the IC	HR Head	IC
2.2.4	Display of names and contact details of members of IC at all branches/locations.	HR Head	Admin
2.2.5	Display the constitution of IC and penal consequences of Sexual Harassment at conspicuous place(s) in the Workplace.	HR Head	Facilities
2.2.6	Submit Annual Reports under POSH Act containing: <ul style="list-style-type: none">• Number of complaints received during the year• Number of complaints disposed of during the year• Number of cases pending for more than 90 days• Number of workshop/programme against Sexual Harassment carried out• Nature of action taken by the Company / HR	HR Head	Deputy Collector / Labour Office
2.2.7	HR Head will be responsible for the co- ordination and meetings of the IC. HR Head shall monitor timely submission of reports by the IC.	HR Head	-
2.2.8	Report of the number of Sexual Harassment cases filed, if any and their disposal to be included in the Directors report which forms part of the Annual Report of the Company.	HR Head	Registrar of Companies
2.2.9	Provide assistance to the Aggrieved person / Complainant-if she chooses to file a complaint in relation to an offence under the Indian Penal Code or any other applicable law in force.	HR Head	Aggrieved person / Complainant
2.2.10	Provide necessary facilities to the IC and assist in securing the attendance of Respondent and witnesses before the IC.	HR Head	IC
2.2.11	Cause its subsidiaries to adopt Policy on prevention, prohibition and redressal of Sexual Harassment, which shall be consistent with this Policy, whenever applicable.	Board of Directors	Subsidiary Company

Document Name	Document Sample
Annual Return Format	 Format.docx

Annexure B

Template of Formal Complaint to IC

Section 1: Details of the Aggrieved Individual / Victim

Name	
Designation	
Division/ Unit/ Department	
Contact Number	
Address (office)	

If Applicable- Details of Complainant who is filing the form on behalf of the aggrieved individual/ victim

Name	
Relationship with Aggrieved Individual(Victim)	
Designation (if Complainant is an employee)	
Division/ Unit/ Department (if Complainant is an employee)	
Contact number	
Address (office/ administrative unit where the complainant works)	
Reason for Aggrieved Individual is unable to file the complaint	<ul style="list-style-type: none"><input type="radio"/> Physical incapacity<input type="radio"/> Mental Incapacity<input type="radio"/> Death<input type="radio"/> Any other reason_____

Section 2: Details of the Alleged Harasser

Name	
Designation	
Division/ Unit/ Department	
Contact Number	
Address (place of work of the alleged harasser)	

Section 3: Details of the incident

Description of the incident	
Other details (if the incident was repeated/any previous incident)	
Date and time of the incident/s	
Details of witness/witnesses	
Details of any documents available (Example: Messages, emails, letters etc.)	

Details of any person/s contacted by aggrieved individual after the incident	
Any other relevant information/ comments	

Section 4: Additional Information

Section 5: Attestation

Name of the Aggrieved Individual:

Signature:

Name of the complainant (If applicable):

Signature:

Note: signature of complainant/ aggrieved person should be on every page of the complaint if made in writing)