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INDORE COMPOSITE PVT LTD

POLICY ON PREVENTION OF SEXUAL HARRASMENT AT WORK PLACE



Prepared By : HR / ADMIN

Checked By : HR / ADMIN



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1. INTRODUCTION:

1.1. Indore Composite Pvt Ltd (ICPL) is an equal opportunity employer and is committed to create a healthy work environment that enable employees to work without fear of prejudice, gender bias, sexual harassment and all forms of intimidation or exploitation. It is committed to provide a work environment that ensures every employee irrespective of their gender is treated with dignity and respect.

- 1.2. This Policy is directed towards **Zero Tolerance** for Sexual Harassment and any act of sexual harassment will invite serious disciplinary action.
- 1.3. The Policy is meant to educate employee about what constitutes Sexual Harassment, the ways and means adopted to avoid occurrence of any such event, and in the unlikely chance of such an occurrence, to enable a fair mechanism for dealing with such conduct.

2. OBJECTIVE:

- 2.1. Promote a workplace based on equality and respect
- 2.2. Provide and safe and congenial work environment
- 2.3. Awareness and sensitization about sexual harassment at the workplace
- 2.4. Prevention and protection against sexual harassment
- 2.5. Outline the duties, responsibilities and rights of various stakeholders involved in the process.
- 2.6. Define the implication of sexual harassment.

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3. SCOPE AND EFFECTIVE DATE:

3.1. The Policy extends to all employees of the Company; all temporary, contract employees as well as trainees

- 3.2 All the office premises and areas which can be termed as extension of Company's Workplace.
- 3.3 Any interaction arising as a result of employment within the Company; and
- 3.4 All visitors / vendors associated with the Company and visiting any premises of the Company
- 3.5 The Policy is deemed to be incorporated in the service condition of all employees and comes into effect immediately.
- 3.6 Where sexual harassment occurs to any of the employee of the Company as a result of an act by a third party or outsider while on official duty, the company will take all necessary and reasonable steps to assist the affected personin terms of support and prevention action to ensure that such harassment does not occur in future.



4. DEFINITION AND INTERPRETATION:

- 4.1 Act shall mean the sexual harassment of Woman at workplace (Prevention, Prohibition and Redressal) Act, 2013.
- 4.2 The following definitions are for the ease of understanding of the employees. The exact definitions are to be referred and interpreted from the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013.

Aggrieved Party: In relation to the Workplace, any employee or visitor who alleges to have been subjected to an act of sexual harassment by the respondent.

Employee: A person employed 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 the knowledge of the principal employer, whether for remuneration

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or not, or working on a voluntary basis or otherwise, whether the terms of employment are express or implied and includes a coworker, a contract worker, probationer, trainee, apprentice or called by any other such name.

Respondent: in relation to the Workplace, any employee or visitor against whom the aggrieved party has made the complaint.

Sexual Harassment: Includes any of the following unwelcome acts or behaviour:

- Physical contact and advances
- A demand or request for sexual favours
- · Making sexually colours remarks
- Showing pornography
- Any other unwelcome physical, verbal or nonverbal conduct of sexual nature

Some of the behaviour / actions listed below are an indicator for employee's clarity only and should not be treated as limited to these alone.

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Physical Harassment:

- Physical contact and advances,
- Intentional touching, pinching, grabbing, brushing against another's body,
- Sexual assault,
- Cornering, trapping or blocking another's pathway,
- Any physical conduct which is unwelcome

Written or Graphic Harassment, which includes:

- Showing pornography,
- The display of pornographic material,
- Written communication that has sexual implications,
- Staring at another's body and or sexually suggestive gesturing.

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 Displaying sexually visual material such as cartoons, computer programmes, catalogues of a sexual nature

Verbal Harassment, which includes:

- A demand or request for sexual favours,
- · Making sexually coloured remarks,
- A demand or request for sexual favours over promises related to employment such as work conditions, promotion and increments.
- Making sexually suggestive comments, threats, slurs, and sexual propositions
- Sexual jokes or teasing, misogynist humour, sexually coloured gender specific jokes
- Comments about how some one looks, especially about parts of the body

The following circumstances may constitute sexual harassment if it occurs or is present in relation to or connected with an act or behaviour of sexual harassment:

- Implied or explicit promise of preferential treatment in employment
- Implied or explicit threat of detrimental treatment in employment
- Implied or explicit threat about present or future employment status
- Interferes with work or creating an intimidating or offensive or hostile work environment
- Humiliating treatment likely to affect her health or safety

Workplace: In addition to the work place of work, it extends to 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.

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5. INTERNAL COMPLAINTS COMMITTEE (ICC)

The Company for the purpose of hearing/ redressal/ investigation of every Complaint received in relation to Sexual Harassment has constituted the IC in accordance with the provisions of the Act. The constitution of the IC is required to be as follows:

- 5.1 Presiding Officer: The presiding officer should be a woman, employed at a senior level who leads the IC. Provided that in case a senior level employee is not available, the presiding officer shall be nominated from other offices or administrative units of the Workplace. Provided further that in case the other offices or administrative units of the Workplace do not have a senior level woman Employee, the presiding officer will be nominated from any other Workplace of the same Employer or other department or organization. Presently the Company has appointed Ms. [•] as the presiding officer.
- 5.2 Other Members: Not less than two members from amongst employees preferably committee to the cause of women or who have had experience in social work or have legal knowledge. Presently the Company has appointed (i) $[\bullet]$; and (ii) $[\bullet]$.
- 5.3 External Member: One member from amongst NGO or associations committed to the cause of women or familiar with the issues concerning Sexual Harassment. Presently the Company has appointed [•]

Further, not less than half of the members of the IC are required to be women members.

The presiding officer and every member of the IC shall hold office for such period, not exceeding 3 (three) years, from the date of their nomination as may be specified by the Company.

IPCL has formed ICC (internal complaints committee) to consider and redress complaints of Sexual Harassment from all the workplaces of the Company.



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ICPL - Corporate Office

Ms. Neena Sanghvi –	Cell- 9004437885
Presiding Officer	Email: nsanghvi@indore.co.in
Ms. Roli Gupta	Cell: 9920130250
ICC External Member	Email: roli191@gmail.com
Ms.Rupali Kulkarni	Cell-9987793342
Member	Email : hr@indore.co.in
Ms.Mahalaxmi Iyer	Cell- 9096078076
Member	Email:mahalaxmi.iyer@indore.co.in
Mr. Victor Sinha	Cell- 9860061766
Member	Email: victor.sinha@indore.co.in

ICPL - Ambernath

Ms. Neena Sanghvi	Cell- 9004437885
Member	Email: <u>nsanghvi@indore.co.in</u>
Ms. Roli Gupta	Cell: 9920130250
ICC External Member	Email: roli191@gmail.com
Ms. Priti Vispute	Cell - 8956242644
Presiding Officer	Email: priti.vispute@indore.co.in
Ms. Sunita Desai	Cell - 9702033361
Member	Email: sunita.desai@indore.co.in
Mr. Girish Mutalik	Cell - 9850434250
Member	Email:girish.mutalik@indore.co.in

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ICPL – Pithampur

Ms. Neena Sanghvi	Cell- 9004437885
Member	Email: nsanghvi@indore.co.in
Ms. Roli Gupta	Cell: 9920130250
ICC External Member	Email: roli191@gmail.com
Ms.Mahalaxmi Iyer	Cell- 9096078076
Presiding Officer	Email:mahalaxmi.iyer@indore.co.in
Ms. Nidhi Soni	Cell - 7304638771
Member	Email: hr.cm@indore.co.in
Mr. Neelam Raghuwanshi	Cell-
	9826622606
Member	Email:neelam.raghuwanshi@indore.co.in

ICPL - Umergaon

Ms. Neena Sanghvi	Telephone: 022 -61452725
	Cell- 9004437885
Member	Email: nsanghvi@indore.co.in
Ms. Roli Gupta	Cell: 9920130250
ICC External Member	Email: roli191@gmail.com
Ms.Mahalaxmi Iyer	Telephone: 022 -
	Cell- 9096078076
Presiding Officer	Email:mahalaxmi.iyer@indore.co.in
Ms.Rupali Kulkarni	Telephone: 022
	Cell-9987793342
Member	Email: hr@indore.co.in
Mr. Vishal Jain	Tel:
	Cell- 9879790554
Member	Email:vishal.jain@indore.co.in

Mr. Mukesh Sanghvi, Managing Director will provide all necessary support to the work of this committee.

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6. Guidelines for the formation of the ICC are given below:

Following is the role and responsibility of the ICC duly constituted under provisions of the Act and this Policy:

- 6.1 To decide whether the facts contained in a Complaint make out a case of "Sexual Harassment" in light of the definition contained in this Policy and under the Act.
- 6.2 To look into the truth of the allegations contained in the Complaint. The ICC is required to look into the truth of any allegation of retaliation against / victimization of the Complainant or any other person assisting her as a result of such Complaint having been made or such assistance having been offered.
- 6.3 To recommend penalties / action to be taken against any person found guilty of having:
- 6.3.1 Sexually Harassed the Complainant, up to and including termination;
- 6.3.2 retaliated against / victimized the Complainant or any other person assisting her as a result of such Complaint having been made or such assistance having been offered; and
- 6.3.3 made false claims of having been Sexually Harassed, up to and including termination.
- 6.4 To recommend appropriate psychological, emotional and physical support (counseling, security and other assistance) for the victim.
- 6.5 To monitor the follow-up action to be taken by the human resources department on receipt of the report of the ICC.

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6.5.1 Raising a Complaint:

6.5.1.1 Any aggrieved party may submit in writing the complaint of Sexual Harassment at the workplace to the ICC, along with the supporting documents and the names and address of the witnesses in writing and can be in form of a letter, within a period of 3 months from the date of incident. This time limit may further be extendedfor 3 months if the ICC is satisfied that there were circumstances that prevented the Aggrieved party from filing a complaint within the said period.

- 6.5.1.2 Alternately, the aggrieved party can also send the complaint through an email or through a co-worker in case he/she is unable to make compliant on account of physical incapacity.
- 6.5.1.3 In the event of death or mental incapacity of the aggrieved party, the legal heirs of the aggrieved party can make a complaint on his/her behalf.
- 6.5.1.4 The aggrieved party is required disclose his/her name, department, division and location she is working in, to enable the ICC to contact his/her and take the matter forward.
- 6.5.1.5 The ICC will render reasonable assistance to the aggrieved party for making the complaints in writing.
 - 6.5.1.6 The Aggrieved party who is victim of Sexual Harassment may, in addition to the above, seek legal remedies as may be provided under the various laws for the time being in force.

6.6 Redressal Process:

6.6.1. Conciliation Proceedings: The ICC may, before initiating an inquiry, and at the request of the Complainant, take steps to settle the matter between the Complainant and the Respondent through conciliation, provided that monetary settlement will not be made the basis of such conciliation.

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6.6.2 Where a settlement has been arrived, the settlement terms will be signed by both the parties. A copy of the settlement will be submitted by the ICC to the Employer, the Complainant and the Respondent and no further inquiry will be conducted by the ICC.

6.6.3 Manner of inquiry into Complaint:

- 6.6.3.1 The Complainant is required to submit 6 copies of the written Complaint or email of the Complaint along with supporting documents and the name and addresses of witnesses.
- 6.6.3.2 Upon failure of the conciliation proceeding, the ICC is required to send 1(one) copy of the Complaint received from the Complainant to the accused (Respondent) within a period of 7 (seven) working days.
- 6.6.3.3 In conducting the inquiry, a minimum of 3 members of the ICC including the Presiding Officer, as the case may be, shall be present.
- 6.6.3.4 The parties will not be allowed to bring in any legal practitioner to represent them in their case at any stage of the proceedings before the ICC.
- 6.6.3.5 The Respondent is required to file his reply with ICC within a period not exceeding 10 (ten) working days from the date of receipt of the Complaint by the Respondent along with list of documents, names and addresses of witnesses.
- 6.6.3.6 The Complainant shall be provided with a copy of the written statement(s) submitted by the Respondent, and reasonable time shall be provided to Complainant to study the same prior to appearing before the ICC. Maximum limit for reasonable time would be 7 (seven) days from the receipt of written statement of the Respondent by the Complainant.
- 6.6.3.7 Within 8 (eight) days from the receipt of written statements of the Respondent by the Complainant, the ICC shall send a notice to the concerned parties, calling for an oral hearing and notifying the date, time and place of hearing to the Complainant and Respondent.

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6.6.3.8 The ICC may permit either party to include, introduce, and adduce new documents as evidence during the oral hearing.

- 6.6.3.9 After hearing all the parties concerned, and upon perusal of documentary evidence (if any) and all the documents which have been filed by the parties, the ICC may terminate the proceedings if it is of the opinion that no prima facie case exists. The ICC may call upon any or all or additional witnesses and ask them any such questions as it may deem fit, which may also include any questions which have been submitted by either party.
- 6.6.3.10 In the event the ICC is of the opinion that a prima facie case exists after hearing all the parties concerned and upon perusal of documentary evidence (if any), along with majority members of the ICC present expressing their individual opinion in writing, the ICC will within one week of the last proceeding, submit a report to the Presiding Officer with its factual findings and observations on whether this Policy has been violated.
- 6.6.3.11 On the basis of the report of the ICC, the disciplinary proceeding for misconduct of Sexual Harassment shall be drawn up/ initiated against the Respondent.
- 6.6.3.12 The ICC has the right to terminate the inquiry proceedings or to give an ex-parte decision on the Complaint, if the Complainant or Respondent fails, without sufficient cause, to present herself or himself for 3 consecutive hearings convened bythe Presiding Officer, as the case may be, provided that such termination or ex-parte order may not be passed without giving a notice in writing, 15 (fifteen) days in advance, to the party concerned.
- 6.6.3.13 During such inquiry on written request of the Complainant, the ICC may at its discretion recommend grant of leave to the Complainant, transfer the Complainant to other Workplace etc or such other relief as may be prescribed under the Act. The Act also prohibits disclosure of the identity and address of the Complainant, respondent and witnesses.
- 6.6.3.14 The ICC during such investigation may exercise the power of a civil court, vested in it, in respect of:

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- 6.6.3.14.1 summoning and enforcing the attendance of any person and examining him under oath;
- 6.6.3.14.2 requiring discovery and production of documents; any other prescribed matter.
- 6.6.3.14.3 The ICC is required to complete the inquiry within a time period of 90 (ninety) days from the date of receipt of Complaint provided that the time taken during the conciliation proceeding will not be taken into consideration, and send the report to the Employer within 10 (ten) days of conclusion of the inquiry.
- 6.6.3.14.4 The Employer is required to take action on the report within 60 (sixty) days thereafter.

The Employer is required to act on the recommendation and report its compliance to the ICC.



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7 PROCEDURE FOLLOWED BY THE ICC:

- 7.1 The Complainant may make in writing a Complaint of Sexual Harassment at Workplace to the ICC giving details of the Sexual Harassment meted out to her within a period of 3 (three) months from the date of the incident and in case of a series of incidents, within a period of 3 (three) months from the date of last incident, which may be extended for a further period of 3 (three) months, if circumstances warrant such extension in the opinion of the ICC in the format prescribed in Annexure A.
- 7.2 The Presiding Officer or any member of the ICC can render reasonable assistance to the person for making Complaint in writing, in case they are unable to do so.
- 7.3 The ICC shall follow principle of natural justice while handling such Complaints.
- 7.4 Where the aggrieved Employee is unable to make a Complaint on account of her physical incapacity, a Complaint may be filed by -
- 7.4.1 her relative or friend; or
- 7.4.2 her co-worker; or
- 7.4.3 an officer of the National Commission for Women or State Women's Commission; or
- 7.4.4 any person who has knowledge of the incident, with the written consent of the aggrieved woman.
- 7.5 Where the aggrieved Employee is unable to make a Complaint on account of her mental incapacity, a Complaint may be filed by-
- 7.5.1 her relative of friend; or
- 7.5.2 a special educator; or

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- 7.5.3 a qualified psychiatrist or psychologist; or
- 7.5.4 the guardian or authority under whose care she is receiving treatment or care; or
- 7.5.5 any person who has knowledge of the incident jointly with her relative or friend or a special educator or qualified psychiatrist or psychologist, or guardian or authority under whose care she is receiving treatment or care.
- 7.6 Where the aggrieved Employee for any other reason is unable to make a Complaint, a Complaint may be filed by any person who has knowledge of the incident, with her written consent.
- 7.7 Where the aggrieved Employee is dead, a Complaint may be filed by any person who has knowledge of the incident, with the written consent of her legal heir.

8 ACTION:

- 8.1 The ICC is required to provide a report of its findings to the Employer within 10 (ten) days from the date of completion of the inquiry and also provide copies of such report to the concerned parties.
- 8.2 If the allegation against the Respondent has not been proved, the ICC may recommend that no action needs to be taken in the matter.
- 8.3 If the ICC arrives at the conclusion that the allegation against the Respondent has been proved, then the Employer on the recommendation of the ICC is required to, subject to the other rights that the Employer and the Complainant may have against the Respondent:

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- 8.3.1 take action for Sexual Harassment as a misconduct; or
- 8.3.2 ask the Respondent to tender written apology to the Complainant, issue warning, withholding of promotions / increments of the Respondent, terminating the employment o the Respondent;
- 8.3.3 deduct from salary / wages of the Respondent or issue direction for payment; such sum as it may consider appropriate to be paid to the aggrieved person or to their legal heirs, as it may determine.
- 8.4 The ICC shall, after completing the inquiry, submit it's recommendations to the Company in respect of the penalty to be imposed and other further actions to be taken (refer to Annexure B for the ICC Report Format). These recommendations shall be given within a period of 90 (ninety) days from the date of receipt of the complaint by the ICC. These actions could include but not limited to the following:
- A letter of warning that will be placed in the personal file of the accused.
- ii) Immediate transfer or suspension without pay or both.
- iii) Cash Fine.
- iv) Stoppage of increment with or without cumulative effect.
- v) Reduction in rank.
- vi) Termination/dismissal from the services of the Company.
- vii) Filing a Complaint before the relevant police station/Court.
- viii) Any other action that the ICC may deem commensurate to the misconduct.
- 8.5 Interim Relief: During the pendency of the inquiry, on a written request made by the Complainant, the ICC may recommend to the Company to:
- Transfer the Complainant or the respondent to any other workplace; or
- ii) Grant leave to the Complainant up to a period of 3 (three) months; or

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- iii) Grant such other relief to the Complainant as may be prescribed.
- 8.6 If ICC is of the opinion that the complaint has been falsely filed, or if any document or evidence relevant with the complaint has been fabricated, the person falsifying shall be subject to firm disciplinary action, which may include dismissal from the services of the Company.
- 8.7 The ICC may take any other action or decision as may be prescribed in the Act.

8.8 Recommendations by ICC and action:

- 8.8.1 On completion of the inquiry, the ICC is required to provide a report of its findings to the competent authority within One Week from the completion of the inquiry. The report is also to be made available to the concerned parties
- 8.8.2 If the allegation has not been proved, the ICC shall recommend that no action is required to be taken in the matter.
 - 8.8.3 If the allegation has been proved, the ICC shall recommend to the competent authority to take appropriate action as per service rules.
 - 8.8.3.1 Written apology
 - 8.8.3.2 Warning
 - 8.8.3.3 Reprimand or Censure
 - 8.8.3.4 Withholding of Promotion
 - 8.8.3.5 Withholding of Pay rise or increment
 - 8.8.3.6 Terminating the respondent from service
 - 8.8.3.7 Undergoing a counselling session



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- 8.8.4 The determination of amount of compensation to be paid to the victim would be based on :
- 8.8.4.1 Mental trauma, pain, suffering and emotional distress caused to the aggrieved party.
- 8.8.4.2 Loss in the career opportunity due to the incident of sexual harassment.
- 8.8.4.3 Medical expenses incurred by the victim for physical or psychiatric treatment
- 8.8.4.4 Income or financial status of the respondent
- 8.8.4.5 Feasibility of such payment in lump sum or in instalments.
- 8.8.4.6 The competent authority has to act upon the recommendation within 30 days of receipt of the same.
- 8.8.4.7 In case the ICC find the degree of offence coverable under the Indian Penal Code, then this fact shall be mentioned in its report and appropriate action shall initiated by the Management for making a Police Complaint.

9. FALSE OR MALICIOUS COMPLAINT AND FALSE EVIDENCE

Dealing with complaints of sexual harassment is a very sensitive matter and any allegations / complaints, however discreetly handled, could prove damaging for the person against whom it has been raised. Baseless allegations should therefore be strictly avoided.

9.1 Where the ICC arrives at a conclusion that the allegation against the Respondent is malicious or the aggrieved Employee or any other person making the Complaint has made the Complaint knowing it to be false or the aggrieved Employee or any other person making the Complaint has produced any forged or misleading document, it may recommend to the Employer to take action in accordance with the provisions of the service rules applicable to her or to take any action including a written apology, warning, reprimand or censure,

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withholding of promotion, withholding of pay rise or increments, terminating from service or undergoing a counselling session or carrying out community service.

It is to be noted that this statement is not intended to discourage employees from coming forward with any complaints. The Company recognizes and expects that some claims may be difficult to prove or support, or may not in fact be found to raise to the level of seriousness deemed necessary to constitute Sexual Harassment. These types of Complaints will not be considered to be false accusations.

10. AWARENESS, COMMUNICATION & EMPLOYER DUTIES:

The emphasis of Company's policy against sexual harassment shall be preventive rather than prescriptive. In this context, the Company will ensure that, all of its employees are aware and fully understand the principles and conduct requirements laid out in this policy. The company shall:

- 10.1 Display at conspicuous locations in the work place, the penal consequences of sexual harassment; and the order constituting the ICC.
- 10.2 Periodically organize workshops and awareness programmes to sensitize the employee to the provisions of the act and orientation programmes for the members of the ICC.
- 10.3 Provide necessary facilities to the ICC to deal with the complaint and conduct an inquiry
- 10.4 Assist in securing the attendance of respondent and witness before the ICC.
- 10.5 Monitor the timely submission of reports by ICC.

11. CONFIDENTIALITY / PROHIBITION OF PUBLICATION

11.1 The contents of the complaint, identity and address of the victim, respondent and witness, any information relating to inquiry proceedings, recommendations of the ICC, and the action taken by the company are not to be made public in any manner.

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However information may be disseminated regarding the justice administered to any victim of sexual harassment without disclosing

the name, address, identify or any other particulars calculated to lead to identification of the victim and witness.

11.2 Access to Reports and Documents

All records of complaints, including contents of meetings, results of investigations and other relevant material will be kept confidential by the company except where disclosure is required under disciplinary and other remedial processes or under applicable laws.

11.3 This Policy seeks to encourage all the Employees to express freely, responsibly, and in an orderly way opinions and feelings about any problem or Complaint of Sexual Harassment. Retaliation against persons who report or provide information about Sexual Harassment or behavior that might constitute Sexual Harassment is also strictly prohibited. Any act of reprisal, including internal interference, coercion, and restraint, by an Employee, violates this Policy and will subject to other rights that the Company and aggrieved Employee may have under law, result in appropriate disciplinary actions.



11.4 Statutory Compliance

- 11.4.1 The above policy is aimed at complying with the sexual harassment of women at workplace (Prevention, Prohibition, and Redressal) Act, 2013.
- 11.4.2 The Company reiterates its commitment to provide its Employees a workplace free from harassment / discrimination and where every employee is treated with dignity and respect.

12 VIOLATIONS AND PENALTIES:

Based on the result of a comprehensive investigation by the ICC,

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any Employee found to be in violation of this Policy is, subject to other rights that the Company and aggrieved Employee may have under law, liable to be terminated from the services of the company

13 MISCELLANEOUS:

- 13.1 Company may make any alteration or amendment or rescind any of the clauses of this Policy in furtherance of the object/purpose for which this Policy is framed, as and when it finds it necessary to do so as long as it complies with the Act.
- 13.2 Nothing contained in this Policy will operate in derogation of any law for the time being in force or to the prejudice of any right of any Employee under any other rules or law.
- 13.3 The ICC will prepare an annual report with the following details and submit the same to the Company to include in its annual report:
- 13.3.1 Number of Complaints of Sexual Harassment received during the year;
- 13.3.2 Number of Complaints disposed off during the year;
- 13.3.3 Number of cases pending for more than 90 (ninety) days;
- 13.3.4 Number of workshops or awareness program against Sexual Harassment carried out; and
- 13.3.5 Nature of action taken by the Employer.



14 OBLIGATIONS OF THE MANAGEMENT:

- 14.1 The management shall provide all necessary assistance for the purpose of ensuring full, effective and speedy implementation of the Policy.
- 14.2 The management shall ensure that the ICC shall be reconstituted once the term of the existing committee is over. In cases if there is/are any complaint(s) against any of the ICC members the management shall take immediate steps to reconstitute the ICC. The time limit specified under this policy shall be inclusive of the time taken for reconstituting the committee.

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- 14.3 The management will monitor timely submission of reports. For this, the management will conduct periodic update meetings with the ICC to ensure that the said Policy is being implemented in letter and spirit.
- 14.4 The management shall provide assistance to the Complainant if she so chooses to file a complaint with the police in relation to the offence under the Indian Penal code, 1860 or any other law for the time is being imposed.
- 14.5 The management will also initiate action under the Indian Penal Code or any other law for the time being in force, against a perpetrator, where the perpetrator is not an employee of the establishment and there is complaint of Sexual Harassment against the said perpetrator in the Workplace where the harassment took place.
- 14.6 The management shall ensure that the annual report of the Company includes the measures taken for ensuring the provisions of the Act are fully complied with and the complaints received under this policy and the action thereon.
- 14.7 The Management will create awareness amongst the

Employees on Sexual Harassment in the following manner:-

- 14.7.1 Training cum Awareness session for the Employees
- 14.7.2 Training cum Awareness session for the ICC members
- 14.7.3 Training cum Awareness session for human resource teams and senior management.



16. CONCLUSION:

The Company has always strived to create a conducive work environment where the relationship between male and female Employees is extremely cordial and will adhere to the provisions of the Act. The objective of this Policy is to create and enhance awareness amongst the Employees. It would be the joint responsibility of human resources team and business heads to create a fair, honest and comfortable work environment and also to conduct seminars, workshops, awareness programme etc.

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ANNEXURE A

Format of Complaint

Incident Reporting Format	
Name of the Complainant/Victim:	
Incident Reported against (Name of the Respondent):	
Date of Reporting	
Incident Details:	
What happened?	
Who was involved?	
When did the incident take place?	
Where did the incident take place?	
How did you get to know this?	
Was it the first time this has occurred or has it happened previously?	
Any witnesses? If yes, please share their names?	
Is there any other physical evidence or documents of the incident?	
If yes, please attach the document or evidence	
Anything else that you would want to mention?	

(Signature of the Complainant/ Victim)

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Prepared By: HR / ADMIN Checked By: HR / ADMIN Approved By: M.D.