

## Prevention of Sexual Harassment - Policy

Applies to	<b><u>Best Agro life Limited</u></b>
Effective From	<b><u>1<sup>st</sup> April 2023</u></b>
Next Review Date	<b><u>1<sup>st</sup> January 2026</u></b>
Issuing Authority	<b><u>HR</u></b>
Version 2023	<b><u>Supersedes previous policy dated 1<sup>st</sup> Jan 2021,</u></b>
Scope	<b><u>All employees</u></b>

<b>Prepared by</b>	<b>Reviewed &amp; Approved By</b>
Human Resources	Board of Directors

**Disclaimer:**

The information contained in this document has been prepared exclusively for internal use by Best Agro Limited. Best Agro does not give any warranties on the information contained, and assumes no liability or responsibility in connection with the information or suggestions contained. Best Agro makes no representations or warranties as to the completeness of this document and disclaims all warranties expressed or implied including – but not limited to – the warranty of merchantability and the warranty of fitness for a particular use or purpose. The present document has been issued in English.

## **Policy against Sexual Harassment at Workplace**

(As per Government of India "The Sexual Harassment of women at Workplace (Prevention, Prohibition and Redressal), Act 2013)

### **1. Policy**

"Protection against sexual harassment & right to work with dignity are universally recognised human rights." The company is committed to creating a safe and conducive work environment that enables employees to work without fear. The company is committed to ensuring no woman/man shall be subjected to sexual harassment at any workplace of the company.

This policy has been formulated to prevent, prohibit and redress sexual harassment in the workplace in accordance with the 2013 Act.

### **2. Objective**

- ❖ Helps to promote and maintain a comfortable, productive work Environment.
- ❖ To recognize forms of sexual harassment at workplace.
- ❖ To understand and follow workplace policy regarding sexual harassment.
- ❖ To report incidents and cooperate in investigations of sexual harassment.

### **3. Scope and Definitions**

This policy covers all offices of the company in India, and protects all women & men within the company's workplace, employed or otherwise.

**3.1** Any alleged to us on act of Sexual Harassment committed in connection with the company's workplace falls under this policy - in or outside of office hours.

Definitions within this policy reflect the definitions of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal), Act 2013:

**3.2** Employee is any person who comes to the workplace is considered by the Act as an employee – either as a regular employee, on an ad hoc or temporary basis, or for a daily wage. They may be directly employed, through an agent or contractor, with or without knowledge of the principal employer. They maybe there for remuneration (or not), on a voluntary basis (or not); and their terms maybe expressed or implied. This includes any co-worker, contract worker, probationer, trainee, and apprentice.

**3.3** Employer is defined as any person responsible for management, supervision and control of the workplace. Management includes people, a board or a committee.

**3.4** Aggrieved woman/man is a woman/man, of any age, whether an employee or not, who alleges they have been subjected to any act of Sexual Harassment.

**3.5** Internal Complaint Committee (ICC) is the formal committee for resolving issues raised by aggrieved woman/man.

**3.6** Respondent is any person against whom the aggrieved woman/man has made a complaint.

**3.7** Workplace Premises, locations, establishments, enterprises, institutions, offices, branches or units established, owned, controlled by the Company. Places visited by the Employee arising out of or during the course of employment, including transportation provided by the employer for undertaking such journey.

**3.8** Sexual Harassment may include one or more of the following unwelcome acts or behaviors - direct or implied:

- i) Physical contact and advances
- ii) a demand or request for sexual favors
- iii) making sexually colored remarks
- iv) showing pornography
- v) any other unwelcome physical, verbal or non-verbal conduct of sexual nature

The following circumstances, among other circumstances, if it occurs or is present in relation to or connected with any act or behavior of sexual harassment may amount to sexual harassment:

- i) implied or explicit promise of preferential treatment in his/ her employment
- ii) implied or explicit threat of detrimental treatment in his/ her employment
- iii) implied or explicit threat about her present or future employment status
- iv) Interference with her/ his work or creating an intimidation or offensive or hostile work environment for her / him.
- v) humiliating treatment likely to affect her/ his health or safety

#### **4. Responsibilities**

##### **4.1 Employee Responsibilities**

Each employee is expected to:

- i) Treat co-workers, customers and vendors with respect.
- ii) Make a conscious effort to refrain from any conduct which may be perceived as sexual harassment.
- iii) Report any incidents of sexual harassment without fear or favour also try to assist the aggrieved woman/ man to file a complaint wherever required.
- iv) Protect other employees and not stand by and witness any act of sexual harassment
- v) Be familiar with the key elements of the policy and seek clarity from the manager or HR when in doubt.
- vi) Be aware of, and not participate in any prohibited or inappropriate behaviours or activities while representing the company.
- vii) Show zero tolerance to sexual harassment or inappropriate conduct.

##### **4.2 HR Department Responsibility**

HR shall ensure that the company complies with the Act to provide a safe workplace

- i. By order in writing constitutes the ICC as guided in the said Act.
- ii. Display at a conspicuous place the penal consequences of sexual harassment
- iii. Ensure the company creates an Internal Complaints Committee in each branch/office also display the ICC members (with their contact details of e-mail id and mobile number) at a visible place
- iv. Organise workshops and awareness training at regular intervals
- v. Ensure all employees of the company and associated companies – male and female – have attended a workshop at least once (see Annexure 3)
- vi. Ensure that this policy against sexual harassment at the work place is shared in appropriate ways – including at time of induction and in discussions with contractors (choose anyone of these terms)
- vii. Ensure the company makes space for the Internal Complaints Committee
- viii. Assist in securing attendance of respondents and witnesses and making information available
- ix. Assist the aggrieved woman/man to file a complaint, if she/he wish so, to the Appellate authority (court or tribunal)
- x. Initiate action as relevant that may include action for misconduct where appropriate.
- xi. Monitor the timely submission of reports by the Internal Complaints Committee on behalf of the company and ensure timely submission of reports / returns to the District Officer
- xii. Ensure the company fully complies with the Act and any amendment of the Act.
- xiii. Execute any disciplinary action as recommended by the Internal Complaints committee

#### **5. Internal Complaints Committee (ICC)**

- To prevent instances of sexual harassment and to receive and effectively deal with complaints pertaining to the same, Internal Complaints Committees (IC) have been appointed for all administrative units / offices of the company. The detail of the committee is notified to all covered persons at the location

(workplace). The committee at each location comprises of:

(a) A Presiding Officer, who shall be a woman employed at a senior level at workplace from amongst the employees. In case of non-availability of senior level woman employee, the Presiding Officer shall be nominated from administrative units of the work place.

(b) Not less than two (2) Members from amongst employees of Best Agrolife preferably committed to the cause of women or who have had experience in social work or have legal knowledge:

(c) One external member from amongst non-governmental organisations or associations committed to the cause of women or a person familiar with the issues relating to sexual harassment Provided that at least one-half of the total Members so nominated shall be women.

(d) At least one half of the total members nominated being women

- Every complaint received shall be forwarded to the ICC for investigation, inquiry.
- The committee members on need basis will be provided with necessary training to handle such matters effectively and with the required sensitivity and concern.

## 6. Redressal Procedure

- Every complaint shall be treated with seriousness and in strict confidentiality.
- Any woman/man, in writing can make a complaint of sexual harassment to the ICC up to 3 months after the incident using Annexure 1 (Compliant Form). In case of a series of incidents, within a period of three months from the date of last incident to, the ICC. She//He can also choose to report via a manager or colleague. If for some reason the woman/man cannot write the complaint, the ICC can help her / him to make the complaint in writing.
- The ICC can consider extending the period by another 3 months, if it is satisfied that the circumstances prevented the aggrieved woman/man from filing a complaint previously.
- Prior to initiating an inquiry, the ICC may, at the request of the Aggrieved woman/man, take steps to settle the matter between the Aggrieved woman/man and the alleged harasser through conciliation, provided that no monetary settlement is made the basis of such conciliation. Where a settlement has been made, the ICC shall record it and forward the same to the company with recommendations where required.
- The ICC will provide copies of the settlement as recorded to the aggrieved woman /man and the alleged harasser. Upon a conciliation being reached, the ICC will not conduct any further inquiry.
- Service rule will be applicable if respondent or the aggrieved woman/man is an employee.

<b>TIMELINES</b>	
<b>Submission of Complaint (by the aggrieved woman/man)</b>	Within 3 months of the last incident
<b>Notice to the Respondent (by ICC)</b>	Within 7 days of receiving copy of the complaint
<b>Completion of Inquiry (by ICC)</b>	Within 90 days of complaint
<b>Submission of Report by ICC/LCC to employer/DO</b>	Within 10 days of completion of the inquiry
<b>Implementation of Recommendations (by employer)</b>	Within 60 days
<b>Appeal (by aggrieved or accused)</b>	Within 90 days of the recommendations

## 7. Investigation

If a settlement is not reached, or any term or condition of the settlement not been complied with by the respondent, the ICC shall conduct an inquiry:

- i. The Aggrieved woman/man and the respondent shall be given written notification to present themselves before the Committee.
- ii. A copy of the statement of the complaint will be given to the respondent who will be allowed to appear before the committee.
- iii. Both parties may submit any corroborative material - oral or written - to substantiate the details.
- iv. If either party desires any witness to be called, they shall communicate in writing to the Committee giving the names of witness(es) that they propose to call. The ICC shall provide them a reasonable opportunity to put forward their perspective.
- v. While conducting the inquiry, a minimum of three members of the ICC, including the Presiding Officer shall be present.
- vi. The ICC shall have the right to terminate the inquiry proceedings or to give an ex-parte decision on the complaint, if the aggrieved woman/man or respondent fails, without sufficient cause, to present themselves, for three consecutive hearings. Provided that such termination or ex-parte order may not be passed without giving a notice in writing, fifteen days in advance, to the party concerned.
- vii. The aggrieved woman/man and respondent may be accompanied by a colleague for psychological or emotional support. Such colleague will not be permitted to speak at or otherwise interfere with the proceedings of the ICC.
- viii. ICC and all? colleagues and witnesses who are part of the ICC proceedings will sign a confidentiality agreement before participating.
- ix. While an inquiry is pending, the aggrieved woman/man may request in writing one of the following, on which the ICC may recommend action to the Company:
  - Transfer the aggrieved woman/man or the respondent to any other workplace
  - Grant leave to the aggrieved woman/man up to a period of three months.
  - Grant such other relief to the aggrieved woman/man as may be prescribed under applicable law
  - The leave granted to the aggrieved woman/man shall be in addition to the leave he/she is otherwise entitled to
- x. Minutes shall be taken down to record the proceedings.
- xi. The format for documentation by the ICC is provided in Annexure 2.
- xii. The committee shall complete the inquiry in confidentiality.
- xiii. The ICC must report the findings to the employer & the concerned parties within 10 days of completion of the inquiry. These conclusions shall recommend action to be carried out by the company.
- xiv. On receiving a recommendation from the ICC, the Company shall implement the recommendations and send a report of such implementation to the ICC.
- xv. The company shall act upon the recommendations given by ICC within 60 days of receipt of recommendations.
- xvi. The committee shall maintain a log of all the complaints and compile an annual report with all the actions initiated to redress the complaints and submit to the head of the company and to the District Officer.

All complaints handled by the Committee shall be in writing to ensure consistency and accuracy in the complaints being lodged. The strictest confidentiality shall be observed, therefore restricting all information generated to the smallest possible group. All efforts shall be made to ensure that the process is brief and quick.

All inquiries should be handled as quickly and fairly as possible, and any inquiry must be completed within 90 days to comply with the law.

## **8. Appeal**

In the event that any person is aggrieved from the recommendations made by the ICC or non-implementation of such recommendations, they may appeal to the Court or Tribunal, as specified by the law, within a period of 90 days of the recommendations.

## **9. Other Considerations**

- i. Retaliation against those reporting sexual harassment is prohibited by this policy. It shall be treated as a major misconduct.
- ii. It shall be ensured that employees making complaints as well as witnesses are accorded protection against any retaliation or unfair treatment of any kind. Any abuse of the policy/protection will warrant disciplinary action and would be taken up with utmost sternness.
- iii. In case it was to be established that during the inquiry any witnesses or either of the involved parties have given false evidence or produced any forged or misleading document, disciplinary action will be undertaken against the individual(s).
- iv. Where any conduct amounts to a specific offence under the Indian Penal Code or under any other law, the ICC shall initiate appropriate action by making a complaint with the appropriate authority or provide assistance to the aggrieved woman/man, if they choose to file a complaint, in accordance with law.
- v. Protection under the policy would not mean protection from disciplinary action arising out of false and bogus allegations made by an employee with mala fide intentions.
- vi. Actions against Sexual Harassment at Workplace Policy could range in their severity, if necessary even extending up to termination of one's employment /contract with the organization.

## **10. Policy Changes**

The company reserves the right to amend the policy from time to time in order to comply with any laws/ rules/regulations that come into effect related to sexual harassment.

**Annexure 1**

**COMPLAINT FORM**

Please complete whichever details you know. You may have help from a colleague, Manager, or member of the Internal Complaints Committee to complete this form

**1.Details of the Aggrieved woman/man;**

Name	Designation	Department	Contact Numbers	Office Address

**2.Details of the alleged harasser (respondent);**

Name	Designation	Department	Contact Numbers	Office Address

**3.Details of the incident(s)**

	Nature / Description of incident	Date of incident	Time of incident	Place of incident	Name and contact details of witnesses if any

**4.Has a report regarding these incidents been filed with any other agency?**

Yes ( ) No ( )

If yes, with whom?

**5.Additional information and comments if any:**

Signature of Aggrieved woman/man:	Date:
-----------------------------------	-------

Signed by:

Presiding Officer:

## Annexure 2

### Checklist for the ICC to record and report complaints

S.N.	Event	Details
1	Date of receipt of the complaint	
2	Name/contact number of the aggrieved woman/man	
3	Name/contact number of the harassed (if different)	
4	Name /contact number of the alleged harasser (respondent)	
5	Date and location of the incident	
6	Summary of the complaint	
7	Complaints committee members present in hearing	
8	Documents collected (List here)	To be attached separately
9	Evidence produced	
10	Witnesses names and contact details	
11	Date of closure	
12	Recommendations submitted on conclusion	
13	Investigation Report	To be attached separately.



**Commitment against Sexual Harassment**

I understand that the company has a zero-tolerance policy towards Sexual Harassment at the workplace.

The company has informed me about the Sexual Harassment in the Workplace Policy, the Internal Complaints Committee, and the penalties for sexual harassment under the Indian Penal Code.

I am committed to act in a professional manner that will respect the dignity of every individual.

Name of the Employee	Date of Joining	Department	Head of the Department

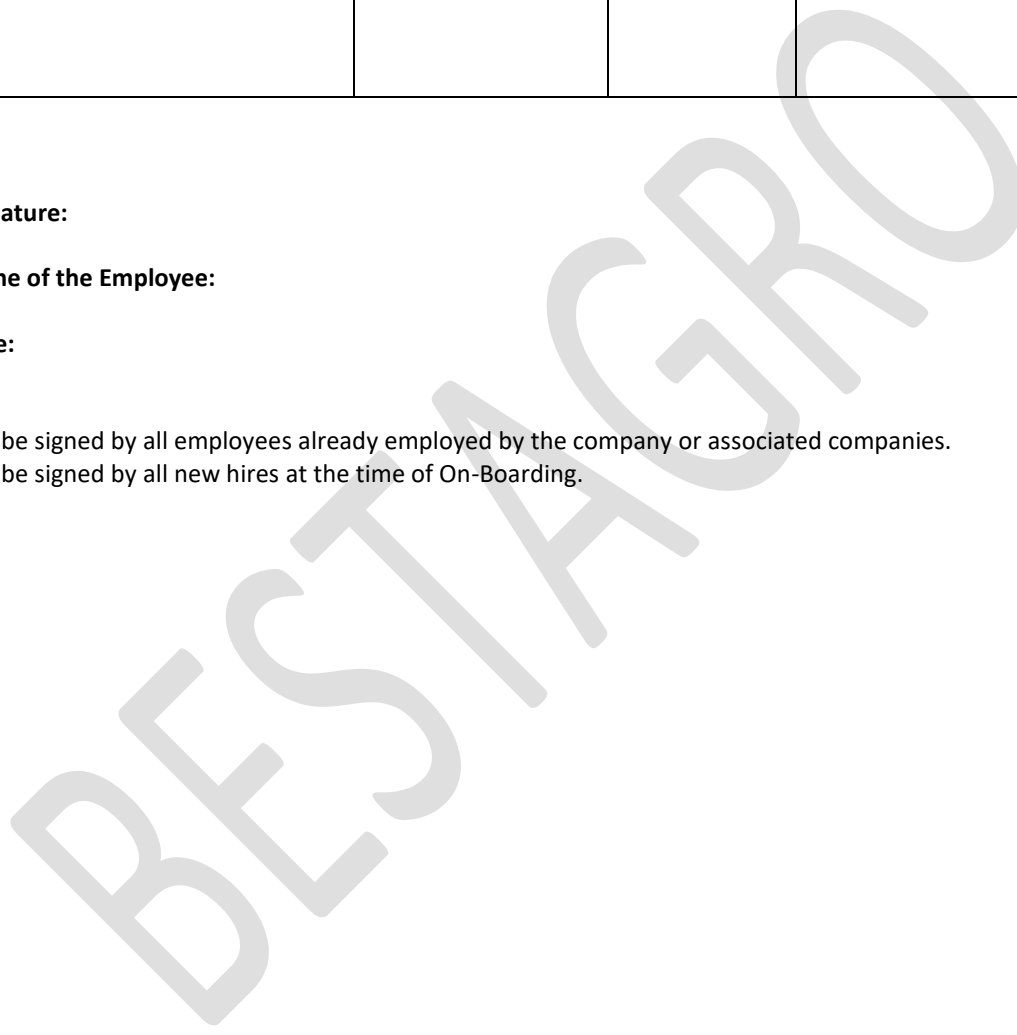
**Signature:**

**Name of the Employee:**

**Date:**

\*To be signed by all employees already employed by the company or associated companies.

\*To be signed by all new hires at the time of On-Boarding.



## Sections of the Indian Penal Code (IPC) – Sexual Harassment and Punishment for Sexual Harassment

Under the Indian Penal Code, the newly introduced Section (S. 354A) which deals with Sexual Harassment has made this a 'cognizable offense' i.e. a person charged with Sexual Harassment may be arrested **without a warrant**.

(1) A man/ woman committing any of the following acts:

- (i) physical contact and advances involving unwelcome and explicit sexual overtures; or
- (ii) a demand or request for sexual favours; or
- (iii) showing pornography against the will of a woman/man; or
- (iv) making sexually coloured remarks,

shall be guilty of the offence of sexual harassment.

(2) Any man or woman who commits the offence specified in clause (i) or clause (ii) or clause (iii) above, shall be punished with rigorous imprisonment for a term which may extend to three years, or with fine, or with both.

(3) Any man/woman who commits the offence specified in clause (iv) above shall be punished with imprisonment of either description for a term which may extend to one year, or with fine, or with both.

In addition to Section 354A set out above, acts of Sexual Harassment may also constitute other offenses under IPC including Section 354 (assault or criminal force to woman/man with intent to outrage her/his modesty), Section 354 B (Intent to disrobe), Section 354C (Voyeurism), Section 354D (Stalking), Section 294 (Obscene acts and song) and Section 509 (word, gesture or act intended to insult the modesty of a woman/man) of the IPC.

## Frequently Asked Questions

These FAQs are provided only to help interpret the main policy document. In the event of a conflict in the wording/interpretation between the policy clauses and FAQ, the policy clauses shall prevail.

### 1. What is sexual harassment?

Please see the Sexual Harassment at the Workplace Policy for the, but this can include:

- a demand or request for sexual favours
- making sexually coloured remarks or unwelcome suggestive or insulting sounds, such as whistling
- unwelcome sexual propositions, invitations, solicitations, flirtations, advances, leering at someone, degrading language, sexual jokes, innuendos or gestures
- offering or implying preferential treatment in employment (such as a promotion, better work assignment, facilities, etc.) in exchange for sexual favours or submission to sexual conduct;
- implied or explicit threat of detrimental treatment in employment in the event of not submitting to sexual advances
- displaying sexually suggestive objects, pictures, videotapes, visuals that are not apropos to any business or academic purpose
- making unnecessary and unwanted physical contact, such as hugging, touching without consent, patting, etc.
- indecently commenting on a person's dress, physical appearance, gender.
- repeatedly pursuing someone despite expression of disinterest by the person
- any other humiliating treatment as experienced by the aggrieved woman/man and likely to affect mental well-being, health and safety

### 2. Whom do you mean by an aggrieved woman/man and respondent?

Please see the Sexual Harassment at the Workplace Policy for definitions of each of these.

### 3. Can both men and women be victims of sexual harassment?

Yes, both men and women can be victims of sexual harassment, therefore, under this policy the ICC will take forward the complaint of an aggrieved woman/man both. It will be covered under code of conduct of the organisation.

### 4. If someone of the same gender is harassing me, is it construed as sexual harassment?

Yes, an act can be construed as sexual harassment even if it is by a person of the same gender. It will be covered under code of conduct of the organisation.

### 5. What can I do if I believe I have been sexually harassed at work? How do I file a complaint?

If you believe you have been sexually harassed, you need to make a complaint as soon as possible, in writing, to any of the Internal Complaints Committee member (ICC) or you can write to [wecare@bestagrolife.com](mailto:wecare@bestagrolife.com). Legally you have 3 months to report the incident or incidents from the last date of the incident occurred.

### 6. What if I (aggrieved woman/man) can't make the complaint myself?

In case you are unable to make a complaint on account of certain physical or mental incapacity, such other person as prescribed underneath can make the complaint on your behalf;

- relative or friend; or
- a special educator; or
- a qualified psychiatrist or psychologist; or
- the guardian or authority under whose care he/she is receiving treatment or care; or
- any person who has knowledge of the incident, with his /her written consent

### 7. Can I (aggrieved woman/man) make an anonymous complaint?

The organisation will not be in a position to initiate any investigation or action on an anonymous complaint. Every complaint must be accompanied with complete details of the Aggrieved woman/ man, respondent and the incident(s).

**8. What if I (aggrieved woman/man) am being harassed by a very senior person in the organisation? If I (aggrieved woman/man) lodge a complaint, will it have an adverse effect on me and my job? Will the process be transparent and fair? Will my complaint be handled with confidentiality?**

All cases of sexual harassment lodged, will be treated and managed fairly, confidentially, sensitively and with equal importance irrespective of whom the case is filed against. If proven guilty, appropriate measures will be taken against the respondent.

The organisation will take every effort to ensure that no adverse impact is caused to the aggrieved woman/man, his/her reputation and image, or job for lodging a complaint.

However, in case the ICC arrives at a conclusion that the allegation against the respondent is malicious or the complaint has been made knowing it to be false or the aggrieved woman/man has produced any forged or misleading document, action may be taken against the aggrieved woman/man in accordance with the provisions of the service rules applicable to him/her.

**9. I know someone else in my office is being harassed. Can I file a complaint?**

It is the duty of every employee to ensure that the workplace is safe and conducive to all stakeholders. If you observe that anyone else is being subjected to behaviour that you believe might be sexual harassment, you should encourage the aggrieved woman/man to report it to the ICC as a written complaint.

**10. I know someone in my organization is harassing a non-employee, a vendor or client, or partner, at the workplace. Can I file a complaint?**

It is the duty of every employee to ensure that the workplace is safe and conducive to all stakeholders. If you see anyone else who is a non-employee is being subjected to behaviour that you believe might be sexual harassment, you should bring it to the notice of your HR Head, who will deal with this appropriately.

**11. Does every company have to have an Internal Complaints Committee?**

Since December 2013 every "workplace" in India with more than 10 employees has to have an Internal Complaints Committee. For all employees of companies smaller than that – including domestic workers – the law provides for "Local Complaints Committees" in each block or Taluk.

**12. Are all working women covered?**

The Act covers all workplaces government and private; informal and formal. Domestic workers are also covered and if you employ someone to work in your house and they feel they are sexually harassed then they can make a complaint to the Local Complaints Committee.

**13. Do I have to produce proof or evidence while filing my complaint? What if there isn't any?**

While filing the complaint, it is necessary to provide complete details of the incident - nature of the behaviour, date, time and place of occurrence(s), details of the alleged harasser, witnesses if any and all possible information and evidence that may be available. Any information that supports the complaint, however small, should be included.

**14. If I am being harassed by an employee of another company, what is the process to file a complaint? Do I approach my company's committee or the other company's?**

You need to file the complaint with the ICC of your organisation. Your organisation will then initiate discussions with the alleged harasser's organization and follow the appropriate investigation proceedings formally.

**15. Whom can I speak to confidentially about my situation and seek advice?**

You may speak with any person you are comfortable with who can also act as your support person during the investigation process.

However, if you are seeking advice to understand whether the behaviours you've experienced would constitute sexual harassment, the process and details of lodging a complaint, investigation proceedings, possible outcomes,

etc. it is recommended that you connect with the HR team in your organisation, since they would have complete and correct information and can guide you appropriately.

**16. I was in a relationship at my workplace but the same ended. If he harasses me, can I still lodge a case of sexual harassment against him?**

If a mutual relationship with an employee has ended and post the same you experience mis-behaviour and harassment from that employee, the same will fall under the purview of this policy and you may lodge a complaint against the said employee.

**17. Can sending jokes comprising mild sexual content be construed as harassment?**

Sharing jokes or any other content with sexual connotations with a colleague can be inferred as harassment and can call for lodging a complaint.

**18. If I am not a permanent employee, can I still make a complaint?**

If you are not a permanent employee on the rolls of the company but are employed with the company for any work on temporary, part time, ad hoc or daily wage basis, either directly or through an agent, including a contractor, whether for remuneration or not, or working on a voluntary basis or otherwise, whether the terms of employment are express or implied including a co-worker, a contract worker, probationer, trainee, apprentice or called by any other such name, you can lodge a complaint in the event of being sexually harassed.

**19. If the incident takes place outside the office premises or in the office transport etc., can I register a complaint?**

Yes. If the incident takes place at any of the organisation's premises, locations, establishments, enterprises, institutions, offices, branches or units established, owned, controlled by your organisation or places visited by you arising out of or during the course of employment including transportation provided by your organisation for undertaking such journey, the same can call for lodging a complaint.

**20. What kind of redressal can I expect from the ICC if I complain?**

If the ICC arrives at the conclusion that the allegation against the respondent has been proved, it shall recommend in writing to the Company to act against the respondent, which may include

- a written apology from the respondent
- a letter of warning may be placed in the personal file of the respondent
- reprimand or censure
- immediate transfer or suspension without pay
- termination from service
- withholding of pay rise or increments
- undergoing a counselling session
- carrying out community service
- register a FIR against the respondent in case the act alleged, prima facie constitutes an offense under the Indian Penal Code
- deduction from the salary or wages of the respondent such sum as it may consider appropriate to be paid to the aggrieved woman/man or to his/ her legal heirs

During an inquiry, on a written request made by the aggrieved woman/man, the ICC may recommend the following to the Company:

Transfer the aggrieved woman or the respondent to any other workplace

Grant paid leave to the aggrieved woman/man up to a period of three months over and above the entitled leaves.

grant such other relief to the aggrieved woman/man as may be prescribed under applicable law

restrain the respondent from reporting on the work performance of the aggrieved woman/man or writing his/her confidential report and assign the same to another officer

**21. What happens if I am not happy with the measures taken by ICC after investigating?**

In case you are dissatisfied with the recommendations made by the ICC or non-implementation of such recommendations, you may appeal to the nearest court or tribunal – including the Local Complaints Committee or District Officer - within a period of ninety days of the recommendations.

**22.If I am harassed by a person who is not an employee, but a visitor to my office, does it fall under the purview of this policy and can I report the incident?**

Yes. If one is being harassed by a non-employee who is a visitor to the office in any capacity, the same will fall under the purview of the policy and can be reported as sexual harassment.

**23.Can I have a colleague accompanying me for support during the investigations?**

If you are the aggrieved woman/man or respondent (alleged harasser), you may have a colleague present with you during the investigatory interview to support you during the process. This support person must be an employee of the organisation, cannot be a legal practitioner and cannot be a potential witness in the case. The support person cannot be a respondent or aggrieved woman/man in any other case in the organisation at that point in time and must not be a legal practitioner.

Further, the role of the support person is only to provide moral and emotional care to you. He/she cannot act as an advocate on your behalf, and must maintain strict confidentiality of the process. If the support person violates the same, he/she can be prohibited from attending the investigation proceedings.

**24.As a respondent (alleged harasser), what can I do if I am wrongly framed? How will the organisation help me restore my reputation?**

In case of a malicious complaint, the management will take disciplinary action against the aggrieved woman/man in accordance with the service rules applicable.

The contents of the complaint made, the identity and addresses of the aggrieved woman/man, alleged harasser and witnesses, any information relating to inquiry proceedings and recommendations of the ICC shall not be published, communicated or made known to the public in any manner.

There will be a formal written communication to you by the management that the case is closed and that you are found 'not guilty' of the claims made against you. The same will go on record in your personal file.

**25.Can one-off act be reported?**

The uncomfortable and unwelcome behaviour need not be repeated or continuous for it to amount to sexual harassment. A single incident (as described in Q3 above) can also be reported as sexual harassment.

Will an incident and investigation be filed on my personal file in the organisation?

A complaint, once formally and officially reported, will feature in a separate file maintained by the ICC respondent along with complete details of the incident, its investigation, outcome and closure.

Who oversees company compliance with this law?

In every District there is now a District Officer mandated to oversee local companies' compliance with the law. All committees – Local and Internal - must report annually to the District Officer on how many inquiries were dealt with by the committee.

If you have any questions that are not covered in the policy document and FAQ's, please write to/ contact HR.