SK MINERALS & ADDITIVES LIMITED

ANTI-SEXUAL HARASSMENT POLICY

1. <u>BACKGROUND</u>

- 1.1. The Government of India has made a law called 'The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act 2013' which has come into force on December 09, 2013 for prevention of sexual harassment against female employees at the workplace. Any person making unwelcome physical contact and explicit sexual overtures, demanding or requesting sexual favors, making sexually coloured remarks or showing pornography against the will of a woman shall be guilty of the offence of Sexual Harassment and the relevant provisions of Bharatiya Nyaya Sanhita.
- 1.2. SK Minerals & Additives Limited (formerly SK Minerals & Additives Private Limited) (the "**Company**") aims to provide a safe working environment and prohibits any form of sexual harassment. The Company 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. The Company also believes that all its employees have the human right to be treated with dignity. Sexual Harassment at the workplace or in the course of official duties, if involving employees of the Company shall be considered a grave offence and is therefore punishable under the applicable laws.
- 1.3. Accordingly, the Company has formulated this Policy called as the "Anti–Sexual Harassment Policy" ("**Policy**") to create and maintain a safe working environment where all employees treat each other with courtesy, dignity and respect irrespective of their gender, race, caste, creed, religion, place of origin, sexual orientation, disability, economic status or position in the hierarchy. This Policy intends to prohibit occurrences of any form of sexual harassment and the detailed procedures to be followed when an employee believes that a violation of the Policy has occurred within the ambit of all board regulations regarding Sexual harassment.
- 1.4. Making a false compliant of sexual harassment or providing false information regarding a complaint will also be treated as a violation of Policy. Violation of this Policy will call for strict disciplinary action up to and including termination.
- 1.5. This Policy has been framed specifically in compliance with the requirements of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013.
- 1.6. This Policy seeks to assist individuals who believe they have been subjected to such behavior with appropriate support and remedial action.

2. <u>APPLICABILITY</u>

This Policy will extend to all employees of the Company including those employed on contractual basis. The Policy extends to those who are not employees of the Company, such as customers, visitors, suppliers, etc., subjected to sexual harassment at the Premises (defined hereinafter) of the Company. It covers incidents occurring at the workplace, client sites, during official travel, and at any event organized by or on behalf of the Company.

3. <u>DEFINITIONS</u>

- 3.1. "Act" means the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013.
- 3.2. "Aggrieved Individual" means in relation to a workplace, an individual, of any age whether employed or not, who alleges to have been subjected to any act of sexual harassment by the respondent.
- 3.3. **"Complainant**" means any aggrieved individual who makes a complaint alleging sexual harassment under this Policy (and / or any person on behalf of the Aggrieved Woman as defined under Section 2 (a) of the Act).

- 3.4. "Employee" means a person employed with the Company 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 or not, or working on a voluntary basis or otherwise, whether the terms of employment are express or implied and includes a co-worker, a contract worker, probationer, trainee, intern or apprentice or such other employee by whatever name called. It also includes any visitor who visits Company premises; or any person who is a temporary resident of any of the accommodations or premises allotted by Company.
- 3.5. "Internal Complaint Committee" or "ICC" constituted under section 4 of the Act.
- 3.6. "Presiding Officer" as defined under Section 2 (1) of the Act.
- 3.7. "Respondent" means the person against whom the Complainant has made a complaint.
- 3.8. "Sexual Harassment" would mean and includes any or all of the following unwelcome acts or behavior (directly or implied) but not limited to:
 - 3.8.1. Any unwelcome sexually determined behavior such as physical contact or advances, requests or demand for sexual favour, either explicitly or by implication, in return for employment, promotion, examination or evaluation of a person towards any company activity;
 - 3.8.2. Any unwelcome sexual determined behavior involving verbal, non-verbal or physical conduct such as sexually coloured remarks, jokes, letters, phone calls, SMS or email communication, gestures, showing of pornography, lucid stares, physical contact or molestation, stalking, sounds, display or pictures, signs, verbal or non-verbal communication which offend the individual's sensibilities and affects his or her performance at the workplace;
 - 3.8.3. Eve-teasing, innuendos and taunts, physical confinement against one's will and likely to intrude upon the individual's privacy;
 - 3.8.4. Physical advances, verbal remarks, or non-verbal gestures such as sending sexually explicit content via emails, texts, or social media platforms.
 - 3.8.5. Stalking, following, or making repeated unwelcome attempts to contact an individual despite indications of disinterest; and
 - 3.8.6. Unwelcome sexual overtone in any manner such as over telephone (obnoxious telephone calls), text message, e-mails or on social media;
 - 3.8.7. Any act or conduct by a person in authority which creates the environment at workplace hostile or intimidating to a person belonging to the other gender, such as presence or occurrence of circumstances of implied or explicit promise of preferential treatment in employment; threat of detrimental treatment in employment; threat about present or future employment; interference with work or offensive work environment; or any other behaviour of a sexual nature that might reasonably be expected or be perceived to cause offence or humiliation or humiliating treatment likely to affect the person's health or safety.
- 3.9. "Unwelcome" means behavior that is unsolicited, unwanted, and uninvited by the offended person.

3.10. "Workplace" means:

- 3.10.1. Premises, location, establishments, enterprises, institutions, offices, branches or units established, owned and controlled by the Company.
- 3.10.2. Places visited by the employee arising out of or during the course of employment including official events, transportation, and accommodation provided by the employer for undertaking such journey.
- 3.10.3. Off sites, events or programs (whether business, social or otherwise) organized or attended, by or on behalf

of SK Minerals & Additives Limited including at a third party's premise.

4. <u>OBJECTIVE</u>

- 4.1. To provide a safe working environment at the workplace which shall include safety from the people coming into contact at the workplace, including client sites, transportation, and offsite events.
- 4.2. To uphold Women's Right to Protection against Sexual Harassment and the Right to Livelihood and towards that end for the prevention and Redressal of Sexual Harassment of Women.
- 4.3. To evolve an effective mechanism for the prevention, prohibition and redress of sexual harassment of employees at the workplace or in the course of official duties with the Company.
- 4.4. To promote an environment that will raise awareness about and deter acts of sexual harassment of employees of the Company.
- 4.5. To ensure implementation of the Policy in letter and spirit by taking all necessary and reasonable steps including but not limited to constitution of appropriate Committees for purposes of gender sensitization and to conduct enquires into complaints of sexual harassment.
- 4.6. To uphold the commitment of the Company to provide an environment that is free from discrimination and violence against women.
- 4.7. To generate general awareness against sexual harassment of women at the workplace.

5. INTERNAL COMPLAINTS COMMITTEE/ COMPLAINT REDRESSAL COMMITTEE

- 5.1. An Internal Complaints Committee (hereinafter called as the "Committee") has been constituted by the Board of Directors of the Company to consider and redress complaints of Sexual Harassment under the provisions of The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (hereinafter called as "Act") and as per the provision(s) of any other enactment, if any, for the time being in force in India and as per the Rules therein as per the notification issued by Ministry of Women and Child Development dated 09th December, 2013 (hereinafter called as "Rule").
- 5.2. Such Committee will be implemented by Human Resource Department of the Company as per the provisions stated under the above-mentioned Act with Rule thereunder as mentioned above.

5.3. Each Internal Committee shall comprise of the following members, to be nominated by SK Minerals & Additives Limited

- 5.3.1. A Presiding Officer of the ICC who shall be a woman employed at a senior level at the workplace from amongst the employees of the organization. Where a senior level woman employee is not available, the Presiding Officer shall be nominated from other offices or administrative units of the Organization. Further, in case the other offices or administrative units of the organization do not have a senior level woman employee, the Presiding Officer shall be nominated from any other workplace of the same Employer or other department or organization.
- 5.3.2. not less than 2 (two) members from amongst the employees of the company preferably committed to the cause of women, or who have had experience in social work or have legal knowledge; and
- 5.3.3. 1 (one) member from amongst non-governmental organizations or associations committed to the cause of

women or a person familiar with the issues relating to Sexual Harassment.

- 5.4. A Quorum of 02 (Two) members is required to be present for the proceedings to be conducted in the Committee.
- 5.5. If in the Committee the member representing the category of the Defendant is junior in the hierarchy of the Company to the Defendant, then, for that particular enquiry that member shall be substituted on the Committee by another person, senior in rank to the Defendant.
- 5.6. No person who is a Complainant, witness or Defendant in the complaint of sexual harassment shall be a member of a Committee.
- 5.7. Any Committee member charged with sexual harassment in a written complaint must step down as a member during the enquiry into that complaint.
- 5.8. In the Committee, not less than one half of the number of members shall be women.
- 5.9. Changes in the Members of the Committee, whenever necessary, shall be made as expeditiously as possible by the Board.
- 5.10. Where the Chairperson or any member of the Committee:
 - 5.10.1. contravenes any provision of the Act read with Rule stated therein; or
 - 5.10.2. has been convicted for an offence or an inquired into an offence under any law for the time being in force is pending against him; or
 - 5.10.3. has been found guilty in any disciplinary proceedings or disciplinary proceeding is pending against him; or
 - 5.10.4. has so abused his position as to render his continuance in office prejudicial to the public interest, as the case may be, shall be removed from such Committee and the vacancy so created or any casual vacancy shall be filled by fresh nomination in accordance with the provisions of the Act.
- 5.11. For keeping good Governance in the Company, such Committee will prepare a quarterly/ annually report of the Committee which will be submitted to the Company Secretary and Compliance Officer of the Company at the end of every year.

6. <u>REPORTING & REDRESSAL PROCESS</u>

6.1. Filing of a Complaint

- 6.1.1. Any aggrieved employee, who is subjected to sexual harassment directly or indirectly, may submit a complaint in writing of the alleged incident to any or all the members of the Committee in writing with his/ her signature within 03 (Three) months from the date of occurrence of incident along with supporting and relevant details/ proofs such as, physical copies of emails, recording, details of dates, places, witnesses, etc. The evidence submitted should be tamper proof.
- 6.1.2. Provided however that where such complaint cannot be made in writing, the Chairperson or any Member of the Internal Complaints Committee, as the case may be, shall render all reasonable assistance to the individual concerned for reducing the complaint in writing.
- 6.1.3. Where the aggrieved employee is unable to make complaint on account of her/ his physical or mental incapacity or death or otherwise, her/ his legal heir or such other person as may be prescribed may make a

complaint within 3 (Three) months from the date of occurrence of incident.

- 6.1.4. The Committee may extend the filing timeline by 3 (Three) months if justified.
- 6.1.5. The format in which the complaint is required to be made is annexed as Annexure-I to this Policy.
- 6.1.6. This form will be available with the Committee and on the website of the Company <u>https://skminerals.in/</u>. However, any written complaint received in any form other than the form prescribed in Annexure-I shall also be accepted. The complaint can be submitted to the Committee electronically at <u>companysecretary@skminerals.net</u> or may be physically submitted to any Committee member. The Committee may, but shall not be bound to, accept oral complaints under this Policy.
- 6.1.7. The Complainant should make the complaint in writing. However, if the Complainant makes an oral complaint to the Committee and is unable to make a written complaint, any member of the Committee shall render all reasonable assistance to the Complainant for making the complaint in writing. In such case, the Complainant shall peruse the written complaint and shall for the purposes of authentication sign the same.
- 6.1.8. The filing of a complaint shall not ordinarily adversely affect the Complainant's status/ job/ salary/ promotion/ grades, etc. During the pendency of an enquiry and till the final determination of a complaint of sexual harassment under this Policy, the Company shall not alter the conditions of service of the Complainant/ Witness/ Supporter concerned to their prejudice, as a consequence to the filing, participation or holding of an enquiry under this Policy.
- 6.1.9. The Company encourages prompt reporting of Sexual Harassment incidents so that timely and appropriate action may be taken. Nevertheless, considering the sensitivity of the issue and the emotional aspects that may arise, a delay may be considered favorably by the Committee provided the Complainant submits sufficient cause for such delay.
- 6.1.10. In case the employee has experienced Sexual Harassment during his/ her tenure of employment, but has since left the services of the Company, then, the Committee shall accept a Complaint so long as it is received in writing within 03 (Three) months from the date of cessation of employment.
- 6.1.11. If an employee believes that he/ she is experiencing retaliation of the nature of intimidation, pressure to withdraw the case or threats for reporting, testifying or otherwise participating in the proceedings before the Committee, then, such employee should immediately report the matter to the Committee. Such incidents shall be treated as seriously as an alleged case of Sexual Harassment and will apply even if the original complaint is not given.
- 6.1.12. Similarly, any undue influence whether direct or indirect, to the proceedings by any party shall be construed as 'Misconduct' and shall attract disciplinary action.
- 6.1.13. The Committee shall maintain a register to endorse the complaint received by it and keep the same in custody of the Compliance Officer or other designated person of the Company. The contents of the complaint endorsed in the register shall be kept strictly confidential, if it is so desired, except to use the same for discret investigation. The details shall not be disseminated to anyone except the Legal Team of the Company.
- 6.1.14. The Committee shall hold a meeting with the Complainant within 10 (Ten) working days of receipt of the complaint, but no later than 15 (Fifteen) working days in any case. In exceptional cases, an emergency

meeting may be convened by the Chairperson as per the requirement.

- 6.1.15. At the first meeting, the Committee shall hear the Complainant and record her/ his allegations. The Complainant can also submit any corroborative material with documentary proof, oral or written, etc., to substantiate the complaint. If the Complainant does not wish to depose in person due to embarrassment of narration of events, a lady officer for lady employee(s) and a male officer for male employee(s) desirous of lodging such complaint shall meet and record the statement
- 6.1.16. Thereafter, the Committee shall summon the person against whom the Complaint is made for the purposes of a deposition before the Committee and an opportunity shall be given to such person to give an explanation to the allegations, where after, an 'Inquiry' shall be conducted and concluded.
- 6.1.17. In case of the complaint being found and determined to be of malafide intent or blatantly false or that the incident was publicized without going through the recommended process, such behavior will be construed as a misconduct and the Complainant shall, if deemed fit be liable for appropriate disciplinary action including but not limited to termination of services by the Management of the Company.
- 6.1.18. If the Committee decides not to conduct an enquiry into a complaint, it shall record the reasons for the same in the minutes of the Committee meeting and place the same before the Board of the Company. The Committee shall also make the same available to the Complainant in writing.
- 6.1.19. During the pendency of an Inquiry, the Committee may recommend for transfer of the aggrieved employee or the person against whom the complaint is made; or grant leave to the aggrieved employee up to a period not exceeding 03 (Three) months (which shall be in addition to the leave otherwise entitled) or grant such other relief to the individual as may be prescribed by the Company from time to time.

6.2. Enquiry Process

- 6.2.1. The Committee shall immediately proceed with the Inquiry and communicate the same to the Complainant and the person against whom the complaint is made. The venue of the inquiry shall take into consideration the convenience and security of the Complainant. The identities of the Complainant and all witnesses shall throughout be protected and kept confidential by the Committee.
- 6.2.2. The Committee shall prepare and handover the Statement of Allegation to the person against whom the complaint is made and give him/ her an opportunity to submit a written explanation if she/ he so desires within 07 (Seven) working days of receipt of the same. Further, the Respondent shall file his/her reply to the complaint along with any supporting documents, and names and addresses of witnesses (if any), within a period of ten (10) working days from the date on which the Respondent received the copy of the complaint from the IC
- 6.2.3. The Complainant shall be provided with a copy of the written explanation submitted by the person against whom the complaint is made. If the Complainant or the person against whom complaint is made desires any witness(es) to be called, they shall communicate in writing to the Committee, the names of witness(es) that they propose to call. The responsibility of communicating with the witnesses lies with the Complainant/Defendant regarding the date, time and venue of the meeting.
- 6.2.4. If the Complainant desires to tender any documents by way of evidence before the Committee, she/ he shall supply original copies of such documents. Similarly, if the person against whom the complaint is made desires to tender any documents in evidence before the Committee, he/ she shall supply original/ true copies of such documents. Both shall affix his/ her signature on the respective documents to certify these to

be true copies of the original. The Committee shall have the power to summon any official papers or documents pertaining to the complaint under enquiry.

- 6.2.5. The Committee shall call upon all witnesses mentioned by both the Complainant and the person against whom the complaint has been lodged. The Committee may at its sole discretion, summon necessary and relevant document/ witness, if it is of the opinion that it shall be in the interest of justice.
- 6.2.6. The Committee shall provide every reasonable opportunity to the Complainant and the Defendant for putting forward and defending their respective case. The Committee shall retain the right to disallow any questions that it has reason to believe to be irrelevant, mischievous, slanderous, derogatory or gender insensitive. Any behavior, verbal or otherwise, on the part of the Defendant or his nominee, that is designed to intimidate or subject the Complainant or his/ her witness to mental and physical trauma, shall entitle the Committee to recommend disciplinary action against the Defendant.
- 6.2.7. The Complainant and the Defendant shall have the right of cross-examination of all witnesses.
- 6.2.8. If the Committee believes that the absence of either the Complainant or the Defendant and or their witnesses to the dispute is on valid grounds, the Committee shall adjourn that particular meeting of the Committee for a period not exceeding 15 (Fifteen) working days. The meeting so adjourned shall be conducted thereafter, even if the person concerned fails to appear at the said adjourned meeting of the Committee without prior intimation/ valid grounds.
- 6.2.9. The Committee shall have the right to summon, as many times as required, the Defendant, the Complainant and/ or any witnesses for the purpose of supplementary testimony and/ or clarifications.
- 6.2.10. The Committee shall have the right to terminate the proceedings and to give an 'ex-parte' decision on the complaint, should the Defendant fail, without valid ground, to present himself for 03 (Three) consecutive hearings convened by the Committee.
- 6.2.11. The Committee shall complete the inquiry within a reasonable period but in no case beyond 03 (Three) months from the date of its commencement and communicate its findings and its recommendations for action to the Board of the Company within (Ten) 10 days. In the event of any delay in submission of the Inquiry Report, the reasons for the same shall be recorded in writing by the Committee. The Report of the Committee shall be treated as an Inquiry Report based on which a delinquent employee shall be awarded appropriate punishment by the Board of the Company. The Board will act on the report of the Committee in accordance with the Company Rules.
- 6.2.12. The Committee shall not permit any evidence or examination based on the aggrieved individual's character, personal life, conduct, personal and sexual history.
- 6.2.13. The Committee shall take note of the respective socio-economic positions of the parties, and their hierarchy in the organization of the Company.
- 6.2.14. The Committee shall be governed by such rules and guidelines as may be consistent with prevalent law or regulation, as amended or enacted from time to time.

6.3. Final Decision & Action to be taken

6.3.1. Where the Committee arrives at the conclusion that the allegation against the Defendant has not been proved, it shall recommend to the Board that no action is required. Where an incident of Sexual

Harassment has been determined by the Committee, corrective/ disciplinary action based on the gravity of the offence may be recommended to the Management of the Company/ Board.

- 6.3.2. The range of corrective/ disciplinary measures and such suitable measures and action which the Board may consider imposing, may include but not limited to:
 - 6.3.2.1. A communication/ letter of warning be sent to the employee and a copy of which shall be placed in the personal file of that employee;
 - 6.3.2.2. Immediate transfer or any other appropriate disciplinary action;
 - 6.3.2.3. Stoppage of increment with or without cumulative effect;
 - 6.3.2.4. Reduction in rank;
 - 6.3.2.5. Termination/ dismissal from the services of the Company;
 - 6.3.2.6. Any other action that the Board may deem fit and proper; and
 - 6.3.2.7. Filing of a complaint before the relevant statutory/ police authorities/ court of law.
- 6.3.3. The Board of the Company shall provide all necessary assistance for the purpose of ensuring full, effective and speedy implementation of this Policy.
- 6.3.4. The Committee shall analyze and submit periodical Inquiry Reports on all such complaints received by it at the end of each financial year to the Board of the Company.
- 6.3.5. Upon receipt of the Inquiry Report, the Board shall promptly act on the Inquiry Report. If the Board disagrees or wishes to modify the recommendations of the Committee against Sexual Harassment, it may do so by recording the reasons in writing.
- 6.3.6. A Copy of the Inquiry Report shall be given by the Board to the Complainant and the Defendant. The Board shall, however, take disciplinary action only after giving the Defendant an opportunity to reply to the findings of the Committee.
- 6.3.7. The decision of the Board shall be final and binding.
- 6.3.8. Where the conduct of sexual harassment amounts to a specific offence under the Bharatiya Nyaya Sanhita or under any other law, it shall be the duty of the Committee to immediately inform the Complainant of her right to initiate action in accordance with law with the appropriate authority, and to give advice and guidance regarding the same. Any such action or proceedings initiated shall be in addition to proceedings initiated and/ or any action taken under this Policy. Further, nothing in this Policy shall prevent the Complainant or the person against whom the complaint was made, from pursuing formal legal remedies or resolution through competent authorities empowered by law or regulation or courts of law in India.
- 6.3.9. The disciplinary action shall be commensurate with the nature and impact of the sexual harassment. Nonadversarial modes of redress and resolution could also be considered in appropriate cases which may include verbal warning, verbal apology, promise of good behavior, counseling, etc.
- 6.3.10. A second or repeated offence shall on the recommendation of the Committee attract an enhanced penalty.
- 6.3.11. On the basis of the working of this Policy, the Board of the Company shall have the powers to make recommendations for bringing about changes in this Policy as and when required in keeping with the Preamble and Objectives of this Policy. Any changes to this Policy shall be suitably communicated to all employees by the Human Resources Department of the Company.
- 6.3.12. The Human Resources Department of the Company shall play a vital role in executing this Policy.

6.4. Appeal

Aggrieved parties may appeal the Committee's findings to a tribunal or court within (Ninety) 90 days, as per Section 18 of the Act.

7. <u>PROTECTION TO COMPLAINANT/VICTIM/WITNESSES</u>

The Company is committed to ensuring that no employee who brings forward a harassment concern is subject to any form of reprisal. Any reprisal will be subject to disciplinary action.

The Company will ensure that the victim or witnesses are not victimized or discriminated against while dealing with complaints of sexual harassment. However, anyone who abuses the procedure (for example, by maliciously putting an allegation knowing it to be untrue) will be subject to disciplinary action.

8. <u>POLICY IMPLEMENTATION & REVIEW</u>

8.1. Implementation

- 8.1.1. The Policy will be implemented and reviewed by committees of the Company. The Board reserves the right to amend, abrogate, modify, and rescind/ reinstate the entire Policy or any part of it at any given time.
- 8.1.2. The Company will implement the Committee's recommendations within (Sixty) 60 days and ensure no adverse conditions for the Complainant.

8.2. Training and Awareness

- 8.2.1. The Company will organize annual training programs for employees and Committee members on the prevention of sexual harassment.
- 8.2.2. Awareness campaigns, including posters, emails, and workshops, will be conducted to sensitize employees.

9. INTERPRETATION OF THE CODE

Any question or interpretation under this Code of Ethics and Business Conduct will be handled by the committee or Board of the Company.

10. <u>AMENDMENT TO THE CODE</u>

Any amendment to the provisions of the Act shall be incorporated in this Policy with the prior approval of the Board from time to time. The Board shall have the right to withdraw and/ or amend any part of this Policy or the entire Policy, at any time, as it deems fit, or from time to time, and the decision of the Board in this respect shall be final and binding.

In case any provisions of the Policy are contrary to or inconsistent with the provisions of the Companies Act, 2013, rules framed thereunder and Listing Regulations ("Statutory Provisions"), the provisions of Statutory Provisions shall prevail.

11. <u>NON-COMPLIANCE OF THE CODE</u>

Suspected violations of this Policy may be reported to the Chairperson of the Board or the Chairperson of the Audit Committee. All reported violations should be appropriately investigated. Any waiver of this Policy must be approved by the Board of Directors.

12. <u>CONFIDENTIALITY</u>

- 12.1. Any Information relating to conciliation and inquiry proceedings, recommendations of the Committee and the action taken shall not be published, communicated or made known to the public, press/ media in any manner unless legally required.
- 12.2. Confidentiality is mandatory for all involved in the process. Any breach will attract disciplinary action, including penalties or termination.
- 12.3. Where any person is entrusted with the duty to handle or deal with the complaint, inquiry or any recommendations or action to be taken contravenes, he/ she shall be liable for action as per the Company's disciplinary Policy.

13. **DISSEMINATION OF THE POLICY**

This Policy and any amendments thereto shall be published/ posted on the website of the Company.

ANNEXURE-I

Complaint Sheet*

[Pursuant to the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and the Anti–Sexual Harassment Policy of the Company]

Particulars	Details
Name of the alleged offender(s)/ harasser(s) including	
designation and contact number	
Date(s) and location(s) of the alleged incident(s) of	
harassment	
A detailed description of the incident(s) in question as	
well as other relevant circumstances	
Name of witness(s) including designation and contact	
number	
Details of physical and/ or documentary proof, if any, that	
supports the allegation, including other potential	
Complaints, if any	

Signature	
Name	:
Address	:
Contact No.	
Designation	
Designation Department	:
Date :	

Place :

(Please sign and return this form to any member of the Internal Complaints Committee or Human Resources Department of the Company)

* Within 3 months from the date of occurrence of incident.