POLICY ON PREVENTION OF SEXUAL HARASSMENT AT WORKPLACE

1. COMMITMENT

Our Company is committed to providing work environment that ensures every employee is treated with dignity and respect and afforded equitable treatment.

The Company is also committed to promoting a work environment that is conducive to the professional growth of its employees and encourages equality of opportunity.

The Company will not tolerate any form of sexual harassment and is committed to take all necessary steps to ensure that its employees are not subjected to any form of harassment.

2. SCOPE

This policy applies to all employees of the Company (full time, part-time, trainees, and those on contractual assignments) of the Company including all subsidiaries and affiliated companies at their workplace or at client sites. The Company will not tolerate sexual harassment, if engaged in by clients or by suppliers or any other business associates.

The workplace includes:

a) All offices or other premises where the Company's business is conducted.

b) All company-related activities performed at any other site away from the Company's premises.

c) Any social, business or other functions where the conduct or comments may have an adverse impact on the workplace or workplace relations.

3. DEFINITION OF SEXUAL HARASSMENT

Sexual harassment may be one or a series of incidents involving unsolicited and unwelcome sexual advances, requests for sexual favours, or any other verbal or physical conduct of sexual nature.
Sexual Harassment at the workplace includes:

a. unwelcome sexual advances (verbal, written or physical),
b. demand or request for sexual favours,
c. any other type of sexually-oriented conduct,
d. verbal abuse or 'joking' that is sex-oriented,
e. any conduct that has the purpose or the effect of interfering with an individual's work performance or creating an intimidating, hostile or offensive work environment and/or submission to such conduct is either an explicit or implicit term or condition of employment and /or submission or rejection of the conduct is used as a basis for making employment decisions.

Inappropriate conduct could also be a joke, a prank or even a compliment. These gestures also lead to harassment although the intention of the individual might not be to offend the other person.

4. RESPONSIBILITIES REGARDING SEXUAL HARASSMENT

All employees of the Company have a personal responsibility to ensure that their behaviour is not contrary to this policy.
All employees are encouraged to reinforce the maintenance of a work environment free from sexual harassment.

5. COMPLAINT MECHANISM

An appropriate complaint mechanism in the form of "Internal Complaint Committee" has been created in the Company for time-bound redressal of the complaint made by the victim.

6. INTERNAL COMPLAINT COMMITTEE

The Company has instituted an Internal Complaint Committee for redressal of sexual harassment complaint (made by the victim) and for ensuring time bound treatment of such complaints.

Initially and till further notice the Internal Complaint Committee will comprise of the following members:

Sl. No.	Name	Designation	Position
1.	Ms. Ramyani Chatterjee	Company Secretary	Presiding Officer
2.	Mr. Mithun Dutta	Assistant General Manager	Member
3.	Mr. Subrata Das	Senior Manager- Operation	Member
4.	Mrs. Arthalata Mitra	HR	Member
5.	Mrs. Pradipta Kanungo	Principal, Bloomingdales School	Member, NGO

The Presiding Officer reserves the right to nominate more members of appropriate seniority and rank in the Committee to conduct such enquiries to ensure equal representation of the gender as that of the complainant or for any other valid reason.

The Internal Complaint Committee is responsible for:

a) Investigating every formal written complaint of sexual harassment.
b) Taking appropriate remedial measures to respond to any substantiated allegations of sexual harassment.
c) Discouraging and preventing employment related sexual harassment.

7. PROCEDURES FOR RESOLUTION, SETTLEMENT OR PROSECUTION OF ACTS OF SEXUAL HARASSMENT

The Company is committed to providing a supportive environment to resolve concerns of sexual harassment as under:

A. Manner of Complaint of Sexual Harassment

i. Any aggrieved woman may make, in writing, a complaint of sexual harassment at workplace to the Internal Complaint Committee ('Committee') within a period of three months from the date of incident and in case of a series of incidents, within a period of three months from the date of last incident. Provided that where such complaint cannot be made in writing, the Chairperson or any Member of the Committee, as the case may be, shall render all reasonable assistance to the woman for making the complaint in writing. Provided further that the Committee for the reasons to be recorded in writing extend the time limit not exceeding three months, if it is satisfied that the circumstances were such which prevented the woman from filing a complaint within the said period.

ii. Where the aggrieved woman is unable to make a complaint on account of her physical or mental in capacity or death or otherwise, her legal heir or such other person as may be prescribed may make a complaint under this section.

B. Conciliation

i. The Committee may, before initiating any inquiry and at the request of the aggrieved woman take steps to settle the matter between her and the respondent through conciliation. Provided that no monetary settlement shall be made as a basis of conciliation.

ii. Where a settlement has been arrived at, the Committee shall record the settlement so arrived and forward the same to the Board of Directors to take necessary action in this regard.

iii. The Committee shall provide the copies of the settlement as recorded to the aggrieved woman and the respondent.

iv. Where a settlement is arrived at, no further inquiry shall be conducted by the Committee. Provided that where the aggrieved woman informs the Committee, as the case may be, that any term or condition of the settlement arrived at has not been complied with by the respondent, the Committee shall proceed to make an inquiry into the complaint or, as the case may be, forward the complaint to the police.

C. Inquiry into Complaint

i. The Chairperson of the Committee will proceed to determine whether the allegations (assuming them to be true only for the purpose of this determination) made in the complaint fall under the purview of Sexual Harassment, preferably within 30 days from receipt of the complaint. In the event, the allegation does not fall under the purview of Sexual Harassment or the allegation does not constitute an offence of Sexual Harassment, s/he will record this finding with reasons and communicate the same to the complainant.

ii. If the Chairperson of the Committee determines that the allegations constitute an act of sexual harassment, s/he will proceed to investigate the allegation with the assistance of the Committee members.

iii. Where both the parties are employees, the parties shall, during the course of inquiry, be given an opportunity of being heard and a copy of the findings shall be made available to both the parties enabling them to make representation against the findings before the Committee.

iv. Where such conduct on the part of the accused amounts to a specific offence under the law, the Company shall initiate appropriate action in accordance with law by making a complaint with the appropriate authority.

v. The Internal Complaint Committee shall conduct such investigations in a timely manner and shall submit a written report containing the findings and recommendations to the Board of Directors.

vi. For the purpose of making an inquiry as mentioned above, the Committee shall have the same powers as are vested in a civil court under the Code of Civil Procedure, 1908 when trying a suit in respect of the following matters, namely :-

(a) Summoning and enforcing the attendance of any person and examining him on oath;
(b) Requiring the discovery and production of documents; and
(c) Any other matter which may be prescribed.

vii. The aforesaid inquiry shall be completed within a period of ninety days.

D. Action that may be taken by the Committee during pendency of the Inquiry

i. During the pendency of an inquiry, on a written request made by the aggrieved woman, the Committee may take the following actions :-
(a) Transfer the aggrieved woman or the respondent to any other workplace; or
(b) Grant leave to the aggrieved woman up to a period of three months; or
(c) Grant such other relief to the aggrieved woman as may be prescribed.

ii. The leave granted to the aggrieved woman shall be in addition to the leave she would be otherwise entitled.

E. Inquiry Report and Action

i. On the completion of an inquiry, the Committee shall provide a report of its findings to the Board of Directors within a period of ten days from the date of completion of the inquiry and such report be made available to the concerned parties.

ii. Where the Committee arrives at the conclusion that the allegation against the respondent has not been proved, then no action is required to be taken in the matter.

iii. Where the Committee and Board of Directors together arrives at the conclusion that the allegation against the respondent has been proved, it may take the following actions depending upon the circumstances :

   a. Formal apology
   b. Counselling
   c. Written warning to the Respondent and a copy of it maintained in the employee's file.
   d. Change of work assignment / transfer for either the Respondent or the Complainant.
   e. Suspension or termination of services of the employee found guilty of the offence
   f. Granting of compensation or damages to the Complainant.

F. False or Malicious Complaint

i. Where the Committee arrives at a conclusion that the allegation against the respondent is malicious or the aggrieved woman or any other person making the complaint has made the complaint knowing it to be false or the aggrieved or any other person making the complaint has produced any forged or misleading document, the Complainant shall, be liable for appropriate disciplinary action by the Board of Directors. Provided that a mere inability to substantiate a complaint or provide adequate proof need not attract action against the

complainant. Provided further that the malicious intent on part of the complainant shall be established after an inquiry in accordance with the procedure prescribed, before any action is recommended.

ii. Where the Committee arrives at a conclusion that during the inquiry any witness has given false evidence or produced any forged or misleading document, it may recommend to the Board of Directors to take necessary actions in this regard.

G. Compensation

For the purpose of determining the sums, if any to be paid to the aggrieved woman, the Committee shall consider the following while arriving at the compensation:

i. the mental trauma, pain, suffering and emotional distress caused to the aggrieved woman;
ii. the loss in the career opportunity due to the incident of sexual harassment;
iii. medical expenses incurred by the victim for physical or psychiatric treatment;

8. CONFIDENTIALITY

The Company understands that it is difficult for the victim to come forward with a complaint of sexual harassment and recognizes the victim's interest in keeping the matter confidential.
To protect the interests of the victim, the accused person and others who may report incidents of sexual harassment, confidentiality will be maintained throughout the investigatory process to the extent practicable and approporiate under the circumstances.

9. 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 or other remedial processes.

10. PROTECTION TO COMPLAINANT / VICTIM

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.

11. CONCLUSION

The Company reiterates its commitment to providing its employees, a workplace free from harassment / discrimination and where every employee is treated with dignity and respect.

Approved by the Board on 12.08.2024

Signed on 12.08.2024 by Debajit Choudhury, Managing Director