

KRANTI INDUSTRIES LIMITED

PREVENTION OF SEXUAL HARASSMENT OF WOMEN AT WORKPLACE (POSH) POLICY

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3. Applicability

This policy applies to:

- a. All employees (permanent, temporary, contract, part-time, or interns) working in the organization, whether in India or abroad, at any office or place of work.
- b. Any individual associated with the organization, including clients, contractors, visitors, and any other third-party vendors or stakeholders.
- c. Employees and individuals who are present at work-related events, including social events, conferences, seminars, and off-site locations, during working hours or during any event organized by the company.
- d. Any incident of sexual harassment that occurs in the organization's premises, remote locations, or other venues where the organization's business activities are conducted.

4. Definitions

In this Policy unless the context otherwise requires, the words and expressions stated hereunder shall have the following meaning: -

“Aggrieved Woman” means in relation to a workplace, a woman, of any age whether employed or not, who alleges to have been subjected to any act of sexual harassment by the respondent;

“Employee” means 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 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, apprentice or called by any other such name;

“Employer” or “Management” includes the Managing Director or board or committee responsible for formulation and administration of policies related to prevention of sexual harassment at workplace.

“Internal Complaint Committee (ICC)” means an Internal Complaints Committee constituted in accordance with the Section 4 of POSH Act.

“Respondent” means a person against whom the aggrieved woman has made a complaint under Section 9 the POSH Act.

- implied or explicit threat about the victim's present or future employment status; or
- interferes with her work or creating an intimidating or offensive or hostile work environment for her; or
- humiliating treatment likely to affect her health or safety.

“Workplace” would mean and include the following:

- a. Any premises, locations, establishments, offices, branches, or units established, owned, controlled by the Company.
- b. Any external location visited by the Employee arising out of or during employment including any mode of transportation provided by the Employer or use of public transport such as uber/ola etc. for undertaking a journey to and from the aforementioned Locations.

5. Internal Complaints Committee (ICC):

To prevent instances of sexual harassment and to receive and effectively deal with complaints pertaining to the same, an "Internal Complaints Committee" is constituted in accordance with Section 4 of POSH Act and rules thereunder. The detail of the committee is notified to all covered persons at the workplace.

The ICC shall comprise of the following, namely;

- Presiding Officer: A woman employed at a senior level in the organization or workplace.
- At least 2 members from amongst employees, committed to the cause of women or who had experience in social work or having legal knowledge.
- 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:
- At least one half of the total members so nominated shall be women.

Every member of the committee shall hold the office for the period of three years from the date of nomination.

Current nominated members of the ICC are given in **Annexure A**.

- v. Any person who has the knowledge of the incident jointly with the relative or a friend or a special educator or a qualified psychiatrist or the psychologist or the guardian or the authority under whose care she is receiving treatment or care;
- d. Where an Aggrieved Women, 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;
- e. Where the Aggrieved Women is deceased, a complaint may be filed by any person who has knowledge of the incident, with the written consent of her legal heir.
- f. This Complaint by aggrieved female employee shall be made to ICC in writing and be sent either by post or email or given in person to the ICC of the establishment or any officer authorized by ICC in writing.
- g. The form in which the complaint is required to be made is annexed as Annexure C to the Policy. However, any written complaint received in any form other than the form prescribed in Annexure C shall also be accepted. The complaint can be submitted to the ICC electronically at sheelad@krantigrp.com or at the contact details provided in the attached table or may be physically submitted to any ICC member. The ICC will not accept oral complaints under this Policy unless it is reduced in writing.

B. Inquiry:

- a. The complainant/aggrieved women shall submit 6 (Six) copies of the complaint along with supporting documents and relevant details concerning the alleged incident(s), the name and details of the Respondent and names and addresses of the witnesses.
- b. On receipt of the complaint, the ICC shall send one of the copies received from the aggrieved women to the Respondent within a period of 7 (Seven) working days.
- c. The Respondent shall file his reply to the complaint along with his list of documents, and names and addresses of witnesses, within a period not exceeding 10 (Ten) working days from the date of receipt of the documents.

- b. On the recommendation of the ICC, the employer shall implement the recommendations made and send the report of such implementation to the ICC.

D. Inquiry Report and Actions:

- a. On the completion of an inquiry the ICC shall provide a written report of its findings to the Employer within a period of 10 (Ten) days from the date of completion of the inquiry and such report be made available to the concerned parties.
- b. In the event that the ICC arrives at the conclusion that the allegation against the Respondent has not been proved, it shall recommend to the Employer that no action is required to be taken in the matter.
- c. Where the ICC arrives at the conclusion that the allegation against the Respondent has been proved, it shall recommend in writing to the Employer to take action against the Respondent, which may include:
- Written formal apology from the Respondent
 - Letter of warning may be placed in the personal file of the Respondent
 - Reprimand or censure
 - Withholding of promotion
 - Withholding of pay rise or increments
 - Immediate transfer or suspension without pay
 - Termination from service
 - Withholding of pay rise or increments
 - Undergoing a counselling session
 - Carrying out community service
 - Register 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 Women or to her legal heirs.

If the employer is unable to make such deduction from the salary of the respondent due to his being absent from duty or cessation of employment, it may direct to the respondent to pay such sum to the aggrieved woman.

conciliation and inquiry proceedings, or recommendations of the Internal Complaints Committee. Any person contravening the confidentiality clauses is subject to disciplinary action as prescribed in the act.

9. Non-Retaliation:

The company will not accept, support or tolerate retaliation in any form against any employee who, acting in good faith, reports suspected misconduct, asks questions or raises concerns. Any person who engages in such retaliation directly or indirectly, or encourages others to do so, may be subject to appropriate disciplinary action.

- Retaliation will be treated as a major misconduct.
- Retaliation against those reporting sexual harassment is prohibited by this policy.
- Retaliation means and includes any hurtful employment action against an individual/s.
- Anyone suspecting or experiencing retaliation should report to the appropriate authorities.
- Retaliation cases are treated as serious as an alleged case of sexual harassment even if the original harassment complaint is not proven.

10. Employer shall ensure:

- a. That in case of complaint against any of the members of the ICC, the Employer shall reconstitute the committee after making due investigation of the complaint. In all such case the guidelines stated hereinabove would be inclusive of the time taken to reconstitute the committee.
- b. The Employer shall provide assistance to the complainant, if the Complainant chooses to file a complaint in relation to the offence under the Bhartiya Nyaya Sanhita ("BNS") (Refer Annexure B regarding Punishment for Sexual Harassment under the BNS) or any other law for the time being in force.
- c. The Employer shall also initiate action under the Bhartiya Nyaya Sanhita or under other law for the time being in force, against the respondent, where the respondent is not an employee of the establishment and there is a complaint of sexual harassment against the respondent in the workplace where the harassment took place.

ANNEXURE A**MEMBERS OF INTERNAL COMPLAINTS COMMITTEE (ICC)**

Sr. No.	Name of Employee	Designation	Designation at Committee	Contact Details
1.	Mrs. Sheela Kailas Dhawale	Chief Financial Officer	Presiding Officer	9552561015
2.	Ms. Jayamala Balage	Accounts Executive -	Committee Member	8411031019
3.	Adv. Anuja M. Terkar	Associate Advocate – DMC, Pune	NGO Member	9822190208
4.	Ms. Sampada Barsawade	Company Secretary & Compliance Officer	Committee Member	7028271015
5.	Mr. Rameshwar Kale	Team Leader	Committee Member	9850392913
6.	Mr. Pravin Patil	Team Leader	Committee Member	9011445508
7.	Mr. Dnyandev Bhuwad	Senior Officer- HR	Committee Member	9881121243

ANNEXURE C
COMPLAINT FORM**1. Details of Aggrieved Woman:**

Name	Designation	Division & Department	Contact Numbers	Office Address

2. Details of Complainant (in case the Complainant is not the Aggrieved Individual)

Name	Relationship with Aggrieved Individual	Contact Numbers	Address

3. Details of individual alleged to have engaged in Sexual harassment

Name	Designation	Division & Department	Contact Numbers	Office Address

4. Details of the incident(s)

Sr. No.	Nature / Description of incident	Date of incident	Time of incident	Place of incident	Name and contact details of witnesses if any

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

YES () NO ()

If yes, with whom?

6. Additional information and comments if any:

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Signature of
Aggrieved Woman:
Date:**Signature of**
Complainant:
Date: