

POSH POLICY
METRO BRANDS LTD

POSH POLICY

Prevention of Sexual Harassment Policy

Document Title
Prevention of Sexual Harassment at Workplace (POSH) Policy & Process

Version	Date	Author	Description of Changes
2.0	28 th July 2025	Anita Salian	Policy revised to give effect to provisions of law and make amendments to reflect changes in external environment

Validated By:

Name	Role
Udhaya Shankar	Head - HR Operations
Deepa Sood	Head - Legal & CS
Veena Crasto	External IC Member

Approved by:

Name	Role
Nandini Mehta	CHRO
Nissan Joseph	CEO
Farah Malik	MD

Prevention, Prohibition, and Redressal of Sexual Harassment at Workplace Policy and Procedures**1. Executive Summary**

Metro Brands Limited (hereinafter referred to as the Company), is an equal opportunity employer, committed to ensure a safe, secure, and congenial work environment for all employees, which will enable to render their services without fear of any prejudice, bias, and Sexual Harassment

This policy aims at –

- Ensuring the protection of Employees from Sexual Harassment at Workplace.
- Creating awareness of the Indian law in force with respect to Sexual harassment at the Workplace and Company's internal policy.
- Preventing any Sexual Harassment at Workplace.
- Putting in place the redressal mechanism for complaints raised by the Employees

2. Objective:

- a. It is the endeavours and goal of the Company to provide and promote a place of work that is free from Sexual Harassment, sexual intimidation, or sexual exploitation.
- b. The Company thus implements the Policy in letter and spirit by undertaking all necessary and reasonable steps to provide a safe and non-discriminatory work environment to ensure right to life and workplace dignity for its Employees.
- c. The Company adopts a zero-tolerance policy against any such conduct that violates the guidelines set by the law.
- d. The policy is framed bearing in mind the provisions and applicability of the Sexual Harassment of Women at Workplace (Prevention, Prohibition & Redressal) Act 2013, (herein from referred to as the Act) and the rules framed there under as well as the Company's Code of Conduct and other policies respecting diversity and equality in respect of hiring, promotions, conditions of service, etc. Thus, any conduct or behavior that amounts to Sexual Harassment shall result in disciplinary action as mandated by relevant Company policies and applicable laws.
- e. This policy shall come into effect from *1st January 2023* and shall supersede the earlier policy.

3. Guiding Principles:

- a. Respect the dignity of Employees at Workplace.
- b. Endeavour to instill and develop a transparent and equal-opportunity culture at the Workplace.
- c. Provide a safe working environment free from Sexual Harassment, intimidation, or exploitation.
- d. Prohibit any conduct which may lead to Sexual Harassment at Workplace
- e. Provide a redressal mechanism to put forward grievances of Sexual Harassment and deal with them effectively, immediately and with due regard to confidentiality.
- f. Educate and create awareness of the Policy amongst the Employees and others to whom it applies.

4. Applicability & Scope:

- a. This Policy shall be applicable to all Employees of the Company and visitors to the Workplace.
- b. HR Ops Head and Human Resource Business Partners are appointed as person (s) responsible for overall administration and implementation of this policy, along with the National Sales Head, HODs, Business Heads and Regional Managers.
- c. This Policy shall be applicable to the subsidiaries of the company & visitors to their workplace.

5. Definitions:

- a. **'Aggrieved Woman'** is a woman, who in relation to a workplace alleges to have been sexually harassed.
- b. **'Complainant'** means any person, whether employed or not, who alleges to have been subjected to any act of Sexual Harassment by the Respondent and includes contractual, temporary, visitors.
- c. **'Employee'** means a person employed at the 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 by any other such name.
- d. **'Employer'** means a person responsible for management, supervision and control of the Workplace, where management includes a person or board or committee responsible for formulation and administration of policies for such Workplace.
- e. **'IC' or 'Internal Committee'** means internal committee formed by the Employer under Section 4 of the Act (defined below) to hear and investigate Sexual Harassment complaints of women present at the Workplace whether employed or not
- f. **'Respondent'** means person(s) against whom a complaint of Sexual Harassment has been made by the Complainant.
- g. **'Sexual Harassment'** includes any one or more of the following unwelcome acts or behavior (whether directly or by implication) namely:
 - physical contact and advances.
 - demand or request for sexual favors.
 - making sexually colored remarks.
 - showing pornography.
 - any other unwelcome physical, verbal or non-verbal conduct of sexual nature.

The following circumstances, among other circumstances, if they occur or are present in relation to or connected with any act or behavior of Sexual Harassment may amount to 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 the present or future employment status;

- interference with the person's work or creating an intimidating or offensive or hostile work environment; or
- humiliating treatment is likely to affect her health or safety.

It is to be noted that the Workplace Sexual Harassment is a behavior that is-unwelcome and is sexual in nature. It is a subjective experience and often occurs in the matrix of power. It is the impact on the Complainant that matters and not the intention of the Respondent.

- h. **'Workplace'** means the head office, branch office, stores, warehouse or any other offices of the Company. It also includes any place visited by the Respondent or Complainant in connection with his/her work, during the course of and/or arising out of employment/ contract/ engagement with the Company, which includes transportation, canteen, offsites, client's office, vendor's office, events, or such other place where he/she is connected (digitally or otherwise) to his/her colleagues, clients or vendors, whether from home or any other location etc.

6. Version Control

CHRO and Head Legal & CS of Metro Brands Ltd., will be the joint custodians of this policy. Any revisions to the existing policy will require the approval of both.

7. Constitution of Internal Committee (IC)

- a. The Internal Committee is constituted in accordance with the Act and is subject to the provisions of the Act, consisting of at least the following members as nominated by the Company from time to time
- i. A Presiding Officer who shall be a woman employed at a senior level at workplace from amongst the employees;
Provided that in case a senior level woman employee is not available, the Presiding Officer shall be nominated from other offices or administrative units of the workplace referred to in sub-section (1)
Provided further that in case the other offices or administrative units of the workplace do not have a senior level employee, the Presiding Officer shall be nominated from any other workplace of the same employer or other department or organization
 - ii. not less than two members from amongst the employees preferably committed to the cause of women or who have had experience in social work or have legal knowledge
 - iii. 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. Provided that at least one-half of the total members so nominated shall be women.

iv. An External Committee Member

- b. The names of the members will be circulated as per the Act and this Policy
- c. The tenure of the IC members shall automatically cease upon completion of the term of 3 years from the date of their appointment as IC member. The vacant seat shall be expeditiously filled by the Employer in accordance with the law.
- d. The order constituting IC and penal consequences of Sexual Harassment will be displayed on notice board of offices, warehouses, stores and available as part of HR policies and guidelines.
- e. The Company may reconstitute the IC at any time as per requirement. Any addition to the committee members will be signed off by the Managing Director or CEO of the organization. A communication on such reconstitution shall be sent to all the employees.
- f. The Internal committee may frame administrative guidelines from time to time for its functioning and procedures for investigating a complaint and shall be guided by principles of natural justice and applicable law or court rulings if any.
- g. The Internal Committee will meet and inquire into complaints, as and when it receives a complaint and during such periodicity as it deems necessary to discharge its functions under policy.
- h. The quorum for any such inquiry / meeting of Internal Committee shall be at least four (4) members including the Presiding Officer
- i. The Internal Committee may seek any expert advice or assistance either internally and rely on internal teams of the Company or external consultants and experts as deemed necessary
- j. The Internal Committee will work towards creating an atmosphere for promoting equality, non-discrimination, and gender justice. It will promote and facilitate measures to ensure there is no hostile environment towards employees at workplace. It will also monitor and review the implementation and effectiveness of Sexual Harassment policy
- k. It is the responsibility of the Internal Committee member to keep the content of a complaint, the identity and addresses of the Complainant, Respondent and witness, details of the conciliation and inquiry proceedings, recommendation of the IC, or the action taken against the Respondent highly confidential. Such non-disclosure obligation shall not apply to information regarding the justice secured to any Complainant.

8. Complaint / Redressal Process:

- a. An Aggrieved Woman / complainant may file a written complaint of Sexual harassment at the workplace to the Internal Committee. Format of Complaint shall be as per **Annexure A**. The Internal Committee or the concerned HR/s of the Company shall provide reasonable assistance to the Complainant to have the Complaint lodged as per the format in Annexure A. It shall equally be the responsibility of all managers to notify a member or Presiding Officer of the Internal Committee about an incident of Sexual Harassment that he/she witnesses or is brought to his/her notice by the Employee
- b. A complaint shall be made as provided in the rules framed under this Policy, within a period of 3 (three) months from the date of incident. In case of series of incidents, the complaint shall be made within a period of three [3] months from the date of last incident.
- c. The Internal Committee, in its own discretion and for reasons to be recorded in writing, may extend the time limit not exceeding 3 (three) months, if it is satisfied that the circumstances were such which prevented the Employee from filing a complaint within the said period of 3 (three) months.
- d. Exceptions in the event a Complainant is unable to make a complaint
 - i. Where the Complainant is unable to make a complaint on account of her physical incapacity, the complaint can be filed by –
 - (a) her/his legal heir, or
 - (b) her / his relative or friend or
 - (c) her / his co-worker, or
 - (d) an officer of National Commission for Women or State Women's Commission, or
 - (e) any person who has knowledge of the incident, with written consent of the Complainant
 - ii. Where the Complainant is unable to make complaint on account of her mental incapacity, the complaint can be filed by –
 - (a) her / his legal heir, or
 - (b) her / his relative or friend or
 - (c) a special educator or
 - (d) qualified psychiatrist or psychologist or
 - (e) the guardian or authority under whose care she / he is receiving treatment or care, or
 - (f) any person who has the knowledge of the incident jointly with her /his relative or friend or special educator or qualified psychiatrist or psychologists, or the guardian or authority under whose care she / he is receiving treatment or care.
 - iii. Where the Complainant for any other reason is unable to make a complaint, a complaint can be filed by her / his legal heir or any person who has knowledge of the incident with her / his written consent.

- iv. The Complainant may send a complaint as per Annexure A by e-mail to the POSH committee at posh.complaint@metrobrands.com.
- v. The Complaint can be submitted in a hard copy document (sealed envelope) to the Presiding Officer and/or any IC members
- vi. The Complainant may seek assistance from her/his Superior, HR, or any other Employees in lodging the complaint
- vii. If the Complainant is unable to write the complaint on her/his own, her/his oral complaint shall be reduced in writing by the HR, or such other person as may be authorized by her/him and the same shall be authenticated by the Complainant under her/ his dated signature or thumb impression
- viii. Employees raising a complaint must be committed to talk about the issue truthfully. The Company will make efforts to ensure all complaints of Sexual Harassment are investigated and addressed promptly.
- ix. To the extent possible, the Complainant should keep a record of incidents (dates, times, locations, witness, detail of incidents, SMS, call record etc.) as a record can strengthen the case and helps remembering the details over time, especially when the Complaint is not filed immediately. It is not mandatory to have a record of events to file a complaint but the same would be required during enquiry process.
- x. Internal Committee will acknowledge receipt of the complaint in writing or via e-mail to the Complainant.
- xi. The complaint should include the contact details of the Complainant / victim such as name, address, contact number, department etc. In both the cases above, the written complaint/e-mail must provide the details of the incident together with the name/s of, the alleged harasser/s and the victim/s as available.
- xii. Anonymous complaints shall not be encouraged by Internal Committee for investigation
- xiii. Format of the Complaint is enclosed at Annexure A to this Policy to make the process easier and simpler for the Complainant, IC and for all the Employees.

e. Conciliation:

- i. The Internal Committee may, before initiating an enquiry at the request of the Complainant, take the step to settle the matter

between him/her and the Respondent.

- ii. If both Complainant and Respondent have agreed for a settlement, the Internal Committee shall record such settlement and forward the same to Employer to take actions specified in the recommendation.
- iii. The Internal Committee shall provide copies of settlement as recorded to the Complainant and the Respondent.
- iv. Where a settlement is arrived, no further inquiry shall be conducted by the Internal Committee.
- v. If the Complainant informs the Internal Committee that the Respondent has not complied with any term or condition of the settlement or if no settlement is reached after the conciliation process, an inquiry into the complaint shall be made by the Internal Committee.

f. Conducting of Inquiry by Internal Committee:

- i. The Complainant shall submit to the Internal Committee the complaint along with the supporting documents and the names and the addresses of the witnesses. The complaint shall contain all the relevant material and the relevant details concerning the alleged Sexual harassment including the name(s) of the Respondent as per Annexure A.
- ii. **Notice of Enquiry and communication to the Complainant and the Respondent:** Internal Committee will acknowledge receipt of the complaint in writing or via e-mail to the Complainant within three (3) working days from the date of receipt of complainant. Within a period of 7 (seven) working days from receipt of the complaint, the Internal Committee shall send one copy of the complaint to the Respondent. The Respondent shall file his reply to the complaint along with his documents, name, addresses of the witness within a period of ten (10) working days from the date of receipt of complaint, failing which a summon will be sent to him for a hearing by the Internal Committee
- iii. **Enquiry Process:** The Internal Committee will take necessary action to cause an inquiry to be made into the complaint in accordance with the principles of natural justice. An email communication shall be sent with respect to the enquiry consisting of date, location, and time of the enquiry. The venue of the enquiry should be decided taking into consideration the convenience and security of the Complainant. Both the Complainant and the Respondent will be given an equal opportunity to be heard. No Advocate / legal

practitioner shall be permitted to represent the Complainant or the Respondent. A copy of the findings of the Internal Committee shall be made available to both the parties, enabling them to make representation against the findings of Internal Committee.

- iv. **Answering Sensitive Questions:** Considering the sensitivity of the case and privacy of the Complainant and witnesses, IC shall allow the cross examination to be conducted on Q & A. Such Q & A shall be in writing and duly signed by the Complainant & Respondent.
- v. **Recording of the Proceedings:** All proceedings of the inquiry shall be recorded in writing and shall be duly signed by Complainant, Respondent, and witnesses.
- vi. The Internal Committee shall, in relation to the complaints filed by an Aggrieved Woman, have the power of a civil court as provided under the code of civil procedure, 1908 (5 of 1908) in respect of the following matters:
 - 1. Summoning and enforcing the attendance of any person and examining him/her on oath.
 - 2. Requiring the discovery and production of the documents.
 - 3. Any other matter which may be prescribed under the Act
- g. **Ex-Parte enquiry:** The IC shall have the right to conduct and /or terminate the inquiry proceedings to give an ex-Parte decision on the complaint, after giving advance notice of 15 (fifteen) days in writing, if the Complainant or Respondent fails without sufficient cause to present themselves for 3 (three) consecutive hearings convened by the Presiding Officer. The IC shall complete the inquiry within a period of 90 (ninety) days of receipt of complaint by the Internal Committee.
- h. **Interim relief during Pendency of Enquiry:** The IC during the pendency of the inquiry, on the written request of the Complainant, shall recommend to the Employer:
 - i. 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
 - iii. Restrain the Respondent from reporting on the work performance of the Complainant or writing his/her confidential report and assign the same to another officer.
 - iv. Grant such other relief to the Complainant as may be prescribed.

- i. The leave from work granted as above would be in addition to the leave sanctioned under the leave policy of the Company.
- j. HR / Location head will implement the recommendations of the Internal Committee on interim reliefs and send the report of such implementation to the Internal Committee.

9. Submission of findings of the Internal Committee (Investigation Report):

- a. On completion of an inquiry under this policy, the Internal Committee shall provide a written report of its findings to the CEO / Managing Director, within a period of ten (10) days from the date of completion of the inquiry and such report shall be made available to the complainant and respondent under acknowledgement.
- b. The inquiry report shall specify the details of the charge(s) against the Respondent, the relevant statements made, and evidence rendered by the parties and documents submitted thereto during the enquiry and based upon which the findings were arrived at by the Internal Committee.
- c. If the Internal Committee finds no merit in the complaint, it shall record its reasons for its conclusions and recommend that no action is required to be taken in the matter. In case the Internal Committee 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.
- d. If the Internal Committee finds the Respondent guilty of Sexual Harassment, it shall recommend justifiable and equitable disciplinary action /punishment against the Respondent as per applicable service rules / standing orders/ his/her appointment terms. In case the Respondent is a contract/ agency worker or vendor or consultant or such other person, the forfeiture of such contract and award of penalty, apart from any other legal remedy as applicable to the facts and circumstances of the subjected complaint.
- e. The Internal Committee shall submit their findings and recommendations to the CEO/ MD, duly signed by the PO.
- f. The CEO/MD shall review & make changes to the committee's recommendation, if any.
- g. The CEO/MD to inform HR to action the recommendation within 60 days of receipt of the report.

10. Guidelines for Disciplinary Action:

- a. The Internal Committee shall frame Inquiry Guidelines from time to time as per the Policy for conducting the Inquiry of complaints of Sexual Harassment and to give recommendations on disciplinary action/punishment in case the Respondent is found guilty.
- b. For the purposes of this policy, disciplinary action for the Sexual Harassment may result in any one or more of the following. However, the penalties listed

below are not exhaustive but indicative only -

i. Minor Punishment:

1. Written apology.
2. Warning Letter.
3. Reprimand or censure
4. Debarring from supervisory duties.
5. Undergoing counselling session

ii. Major Punishment:

1. Withholding or stoppage or delay of pay raise or increments/promotion.
2. Termination from service.
3. Transfer to any other company / business location.
4. Deduct salary/wages /adjust Full & Final Settlement of the Respondent such sum as IC may deem appropriate.
5. Determine compensation to be paid to the aggrieved woman as per Section 13(3)(ii) of the Act
6. Demotion.
7. Dismissal with forfeiture of Gratuity, etc.
8. IC can recommend support to take criminal action against the accused.
9. Any other punishment that Internal Committee may deem appropriate at that time.

11. False or Malicious Complaint and False Evidence

- a. Where the Internal Committee arrives at a conclusion that the allegation against the Respondent is malicious or the Complainant, with a malicious intent, has made the complaint knowing it to be false or the Complainant has produced any forged or misleading document, it may recommend to the CEO / Managing Director of the Company as the case may be, to take action against the Complainant in accordance with the provisions of Section 14 of the Act or the service rules as applicable to the Complainant, or if no service rules are available, in consideration of the gravity of the malicious intent. Malicious intent on part of the Complainant can be established only after an inquiry
- b. A mere inability to substantiate a complaint or provide adequate proof must not be inferred as malicious complaint and under such circumstances will not attract action against the Complainant.
- c. Where the Internal Committee arrives at a conclusion that during the inquiry any witness has given any false evidence or produced any forged or misleading document, it may recommend to the Employer of the witness, to take action in accordance with the provisions of the service rules applicable to the witness.

12. Confidentiality

- a. Special privacy safeguard will be applied to the investigation and complaints will be handled on the confidential “need to know” basis. A pseudonym may be used in place of the complainant’s name.
- b. All involved in the proceeding under this policy including the parties, witnesses, facilitators, Internal Committee member shall be under a duty to respect and maintain confidentiality. A format of Non-Disclosure is enclosed as **Annexure B** to this Policy.
- c. The Contents of the complaint made, the identity and addresses of the Employee, Respondent and witnesses, any information related to conciliation and inquiry proceedings, recommendation of the IC, and the action taken by the Employer under the provision of this Policy shall not be published, communicated, or made known to the public, press and media in any manner.
- d. However, information may be disseminated regarding the justice secured to any victim of Sexual Harassment under this policy without disclosing the name, address, identity or any other particulars calculated to lead to the identification of the Employee and witnesses.
- e. The Presiding Officer and Investigating members of the Internal Committee shall sign a Non-Disclosure Declaration during constitution of the Committee. Complainant, Respondent and witnesses shall be signing the Non-Disclosure declaration during start of the investigation process.
- f. Any person who is entrusted with the duty to handle or deal with the complaint, inquiry or recommendations or action under this Policy and contravenes the provisions of confidentiality will be liable for penalty of INR 5000 (Rupees Five Thousand only) to the Employer.

13. Victimization / Retaliation

- a. The Employer will ensure that any Employee subjected to Sexual Harassment or any Employee giving evidence in connection with an instance of Sexual Harassment is not victimized or discriminated against while dealing with complaints of Sexual Harassment and /or in his/her career in the Company.
- b. No Employee will be subjected to retaliatory action relating to his or her report of any alleged Sexual Harassment.
- c. The Employer shall forbid and take necessary steps to prevent any form of retaliation against witnesses. Even where the witness is found to be false and malicious, action shall be taken against him/her as defined in this policy.

14. Appeal

- a. The Complainant or the Respondent, if aggrieved by the findings and recommendation of the Internal Committee or non-implementation of Internal Committee recommendations, may file an appeal to a court or tribunal in accordance with the Act, within a period of ninety (90) days of the recommendations.

15. Annual Report

- a. Internal Committee shall prepare an annual report at the end of the financial year and submit such report to the Employer and to the district officer as required under the Act. The annual report will contain information of complaints received from Aggrieved Women.
- b. The Annual report shall contain the following details-
 - i. number of complaints of Sexual Harassment received in the year.
 - ii. number of complaints disposed of during the year.
 - iii. number of cases pending for more than ninety (90) days.
 - iv. number of workshop or awareness programmes against Sexual Harassment carried out; and
 - v. nature of action taken by the Employer or district officer.

16. Awareness:

- a. The Company shall conduct training sessions, workshop, awareness programs for sensitizing the employees, with the provisions of the Act and on Sexual Harassment. It is mandatory that all employees should attend these awareness programs / training sessions.
- b. The Company will provide necessary facilities to the Internal Committee established by the Company / for dealing with the complaints and conducting an inquiry.
- c. The Company will help in securing the attendance of Respondent and witnesses before the Internal Committee.
- d. The Company will make available all the necessary information required by the Internal Committee.
- e. The Company shall help to the Complainant if she chooses to file a complaint in relation to the offence under the Indian Penal Code 1860, or any other law for the time being in force.
- f. A copy of this policy on prevention of Sexual harassment at the Workplace and the rules framed under this Policy is put up on the notice board of the Company and is also available on the intranet of the Company along with other HR Policies and Guidelines. For any clarification on this Policy, an Employee can approach the HR Department.

Email ID for PoSH Complaints

posh.help@metrobrands.com

List of IC Members:

Name	Email ID	Role
ANITA SALIAN	anita.salian@metrobrands.com	Presiding Officer
DORA MASCARENHAS	dora.mascarenhas@metrobrands.com	Committee Member
SHUCHI SINGH	shuchi.singh@metrobrands.com	Committee Member
ELEZABETH SAJI	elezabeth.saji@metrobrands.com	Committee Member
IQBAL DOSSANI	iqbal.dossani@metrobrands.com	Committee Member
AZIZ FIDAI	aziz.fidai@metrobrands.com	Committee Member
SARASWAT BHATTACHARYA	saraswat.bhattacharya@metrobrands.com	Committee Member
VIPUL MAHESHWARI	vipul.maheshwari@metrobrands.com	Committee Member
VEENA CRASTO	veenacrasto@yahoo.com	External Member

ANNEXURE A

SEXUAL HARASSMENT INCIDENT REPORT/COMPLAINT FORM

Complaint Date: _____

Instructions: Complainants need to fill the form and submit to the Presiding Officer or Internal Committee. The complaint can be mailed to posh.help@metrobrands.com

[Complainant to ensure not to leave any space blank. Please mention "Not Known" wherever the information is not known to the Complainant. The information provided on this form will assist in the investigation process. Please feel free to give details of all related incidents. Employee may seek assistance of her/his Superior, HR Business Partner, Member of the POSH Internal Committee in completing this form. The investigation will be kept confidential unless required to be disclosed under the applicable law]

DETAILS OF COMPLAINANT

<i>Name</i>		<i>Designation</i>		<i>Department</i>	
<i>Location Name</i>		<i>Company</i>		<i>Date of Joining</i>	
<i>Contact #</i>		<i>Email ID</i>			
<i>Communication Address</i>					

DETAILS OF RESPONDENT

<i>Name</i>		<i>Designation</i>		<i>Department</i>	
<i>Location Name</i>		<i>Company</i>		<i>Date of Joining</i>	
<i>Contact #</i>		<i>Email ID</i>			
<i>Communication Address</i>					
<i>Relationship of the respondent to the complainant (Manager / Co-worker / Client / Agency / Customer / Others)</i>					

DETAILS OF THE INCIDENT

<i>Date of the Incident</i>		<i>Approximate Timing</i>		<i>Venue / Location</i>	
<i>Witness Name (if any)</i>		<i>Witness Contact #</i>		<i>Witness Company</i>	
<i>Details of Supporting documents of the incident shared (WA / Chats / text msgs / emails / letters / eye witness / photos / any other</i>					

**** Complainant can attach multiple sheets for capturing multiple incidents related to the complaint**

Nature of incident / harassment to be explained in detail

I certify that the above facts are true to the best of my knowledge. I will cooperate fully in the investigation process and provide relevant details.

Signature of the Complainant

ANNEXURE B
FORMAT OF NON-DISCLOSURE

To,
PO
< Company Name>
<Location & City Name>

NON-DISCLOSURE DECLARATION

I <<Name>> _____, aged about _____ years, S/o/ D/o/ W/o _____,
working at _____ do hereby state and declare as follows:

I am working in capacity of _____ in the Company.

I am aware about the complaint of Sexual Harassment at workplace lodged at _____ and I am required / summoned to participate in the inquiry being conducted by the Internal Committee of _____ (Company) in capacity of being the Complainant / Respondent / Witness/s.

I hereby undertake that I shall maintain absolute confidentiality of any and all information, materials, documents etc., disclosed to or otherwise acquired or observed by me, whether communicated in oral, written or in any form whatsoever, during my participation in the said inquiry proceedings. I shall not, under any circumstances, disclose any information to any person (including my Manager/ Supervisor/ Colleagues) whomsoever at any point of time, unless I am mandated by any law to disclose such confidential information before any Court or public authority, which has sanction of law under which such information can be disclosed.

I fully understand that in the event of any direct or indirect breach of the confidentiality, the Company has right to construe such breach as a gross violation of law and Company's Code of Conduct, the Sexual Harassment of Women at Workplace (Prevention, Prohibition, and Redressal) Act, 2013 and I shall be liable for the disciplinary action as per Company's policies and applicable laws, including termination of my services with the Company.

I hereby declare that this my name and signature and what is stated above is true.

Date:

Place:

Full Name & Signature