



POLICY ON PREVENTION OF SEXUAL HARASSMENT OF EMPLOYEES IN WORKPLACES TAM MEDIA RESEARCH PVT LTD.



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POLICY ON PREVENTION OF SEXUAL HARASSMENT AT WORKPLACE

1. Purpose

It is the policy of TAM Media Research Pvt. Ltd to provide an environment free from harassment for any reason, whether because of age, race, color, religion, gender, creed, national origin, disability, or any other factor, especially sex. Sexual harassment violates an individual's fundamental rights and personal dignity, is unlawful, and shall not be tolerated by TAM Media Research Pvt. Ltd. TAM Media Research Pvt. Ltd considers sexual harassment in all its forms to be a serious offense.

2. Objective :

To provide a work space in which all individuals are treated with respect and dignity where each individual has the chance to work in professional environment that provides equal employment opportunity and prohibits discriminatory practices including harassment.

The Company maintains a zero-tolerance approach towards sexual harassment and is committed to fostering a safe, respectful, and inclusive work environment where all employees are treated with dignity.

Harassment is unacceptable regardless of whether it occurs in the work space or in settings outside the work space such as in Vehicle, third party office, business trip, company events or office sponsored social or business functions.

To promote an environment that will raise awareness about and deter acts of sexual harassment of employees of the Company to uphold the commitment of the Company to provide an environment that is free from discrimination and violence against women.

This Policy aims to protect women from sexual harassment at the workplace and to ensure prevention, prohibition, and redressal of complaints in accordance with The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 ("the Act") with the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Rules, 2013.

The Company strictly prohibits sexual harassment in any form. Such conduct is unlawful under the Act and constitutes a violation of employment terms. Any instance of sexual harassment will invite strict disciplinary action as per applicable laws.

The Company also ensures a fair and impartial process for addressing complaints and will take strict action against any form of retaliation or victimization of the complainant or the respondent.

3. Coverage :

It covers all full-time employees of the Company, contractors, outsourced employees, part-time employees and third party vendors, customers, visitors and people seeking recruitment with TAM Media Research Pvt. Ltd. in both on and off site locations setting when involved in employment or other activities.

The Policy is with respect to Prevention, Prohibition & Redressal of Sexual Harassment which may arise in places not only limited to geographical location viz. Company's offices / branches but includes all such places or locations where acts are conducted in context of working relationships or whilst fulfilling professional duties or which may be visited by an employee during the course of employment including transportation provided by the company for undertaking such visit.

4. Definitions:

- i. **"Employee"** - For the purpose of this policy, the term "employee" means any person on the rolls of TAM Media Research Pvt. Ltd ; and this would also include persons who are temporary or part time or freelancers or honorary employees, by whatever name called and would include persons engaged on a casual basis or for project based assignments and/or persons who are engaged through any third-party service providers. This broad definition of 'Employee' used for the purpose of this policy cannot be used to claim rights of an employee conferred by any other law of the land.
- ii. **Aggrieved woman:** In relation to a workplace, a woman, of any age, whether directly employed or not, who alleges to have been subjected to any act of sexual harassment by the respondent and includes contractual, temporary, visitors.
- iii. **Respondent:** A person against whom a complaint of sexual harassment has been made by the aggrieved woman.
- iv. **"Workplace"** includes the Company's offices, branches, client locations, vendor premises, training venues, conference facilities, business travel, transportation provided by the Company, and any place visited by an employee arising out of or during the course of employment.

For the purpose of this Policy, "Workplace" shall also include Work From Home (WFH), remote working arrangements, hybrid working arrangements, virtual workplaces, and any location from which an employee performs official duties or participates in work-related activities.

The term further includes all virtual and digital work environments, including but not limited to:

- Video conferencing platforms (such as Microsoft Teams, Zoom, Google Meet, Webex, etc.);
- Official emails and electronic communications;
- Messaging and collaboration platforms (such as WhatsApp, Slack, Teams Chat, etc.);
- Company intranet, portals and work-related social media interactions;

- Telephone calls, text messages, and other electronic communications undertaken in connection with employment; and
- Any other digital, electronic, or online medium through which employees interact for work-related purposes.

Any act of sexual harassment occurring through such physical, virtual, remote, hybrid, or digital work environments shall be deemed to have occurred at the workplace and shall be subject to the provisions of this Policy.

The Company shall endeavour to provide a safe working environment in both physical and digital workplaces, including virtual meetings, remote work arrangements, electronic communications, collaboration platforms, and other technology-enabled work environments.

- v. **“Act”** shall mean the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 read with the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Rules, 2013, including any statutory amendment or re-enactment thereof.
- vi. **“Complaint”** shall mean a complaint filed by a Complainant on account of Sexual Harassment. Notwithstanding anything contained elsewhere in this Policy, it is clarified that the above definition of the term “Complaint” will not include anonymous complaints of Sexual Harassment i.e. wherein the identity of the Complainant is not mentioned.
- vii. **“Enquiry”** shall mean the enquiry instituted by the Internal Complaints Committee to investigate a Complaint of Sexual Harassment.
- viii. **“Internal Committee”** shall mean the committee constituted in accordance with Section 4 of the Act. The details about the composition of the Committee is stated in hereinbelow in Annexure.
- ix. **“Policy”** shall mean this Prevention of Sexual Harassment Policy (POSH Policy) of the company.
- x. **“Sexual Harassment”** – The definition of “Sexual Harassment” shall include but not be restricted to the following.
Sexual Harassment is such unwelcome sexually motivated behaviour (whether directly or by implication which includes virtual conduct as well) as:
 - Physical contact and advances
 - A demand or request for sexual favors
 - Sexually colored remarks or remarks of a sexual nature about a person's clothing or body.
 - Showing pornography, making or posting sexual pranks, sexual teasing, sexual jokes, sexually demeaning or offensive pictures, cartoons or other materials through email, SMS, MMS etc.
 - Digital stalking (stalking in all forms of social media)
 - Showing pornography, writing sexually loaded letters/emails/SMS.
 - Visual forms of harassment such as graphic, inappropriate material, posters, cartoons or drawings.
 - Eve-teasing, innuendos and taunts, physical confinement against one’s will.

- Repeatedly asking to socialize during off-duty hours or continued expressions of sexual interest against a person's wishes;
- Giving gifts or leaving objects that are sexually suggestive.
- Persistent watching, following, contacting of a person
- And/or any other unwelcome physical, verbal or non-verbal conduct of sexual nature

Virtual conduct:

- Sending personal and inappropriate messages
- Sexual jokes/forwards/videos/drawings/pictures
- Sexual descriptions over telephone or video conferencing
- Continuous idle chatter over phone which is of sexual nature
- Unwelcome remarks while communicating
- Digital stalking (stalking in all forms of social media)
- Lewd gossips on colleagues about sexual affairs/sexual orientation/preferences/virginity
- Vulgar humor or language while communicating
- Relentless proposals for physical intimacy
- Encroaching personal space by asking inappropriate questions
- Passing Sexual comments on weight, body shape, size, or figure

Following circumstances amongst other circumstances mentioned above may constitute sexual harassment if it occurs or is present in relation or connected with any act or behavior of sexual harassment:

- i. implied or explicit promise of preferential treatment in their employment;
- ii. implied or explicit threat of detrimental treatment in their employment
- iii. implied or explicit threat about their present or future employment status;
- iv. Interfering with their work or creating an intimidating or offensive or hostile work environment;
- v. Humiliating treatment likely to affect the health and safety of the aggrieved woman.

In addition to the instances mentioned hereinabove, any other acts or behavior, which outrages the modesty of a female employee, will be considered as sexual harassment.

xiv. **“Management Team”**: A Management team refers to the person/s vested with the powers to take appropriate disciplinary action, as recommended by IC after holding the POSH enquiry.

5. Complaint Mechanism :

The aggrieved woman should attempt to indicate to the person indulging in the sexually offensive behaviour that the behaviour is unwelcomed, and specifically requesting the respondent to stop the behaviour. Where the aggrieved woman feels that they cannot ask the respondent to stop offensive behaviour, or inspite of having done the same, behaviour continues, they may ask for the behaviour to be dealt with under the grievance procedure.

It is important that the aggrieved woman keeps a written record of dates, times, details of the conduct and witnesses, if any. Each complaint should at the minimum be specific as to:

- Nature of sexual harassment
- Identity of the person/s who is/are involved in the act/s of sexual harassment
- Facts and circumstances in support of the complaint

The aggrieved woman can inform and approach any member of the IC with a written complaint, supporting documents and list of witnesses to poshicum@tamindia.com within period of 90 days from the date of the incident/s. In case the aggrieved woman is not able to register complaint due to any physical incapacity, complaint can be registered with written consent from the aggrieved woman either by a relative, friend, colleague or any person who has knowledge of the incident.

In case the aggrieved woman is not able to register a complaint due to mental incapacity, complaint can be registered with written consent from either of the aggrieved woman's relative, friend, colleague, special educator, a qualified psychiatrist or psychologist, guardian or authority under whose care the aggrieved woman is receiving treatment or care, any person who has knowledge of the incident jointly with the aggrieved woman's relative, friend, colleague, special educator, a qualified psychiatrist or psychologist, guardian or authority under whose care the aggrieved woman is receiving treatment or care. Where the aggrieved woman is dead, complaint can be filed by any person who has knowledge of the incident with written consent of the legal heir of the aggrieved woman.

The IC may extend the time limit not exceeding 3 months by recording the reasons in writing if it is satisfied that the circumstances were such that prevented the aggrieved woman from filing the complaint during the period. When the Complaint is received, it will be promptly investigated in a fair and expeditious manner by the IC.

Irrespective of whether the aggrieved woman opts to initiate criminal proceedings under the IPC, the IC shall be bound to initiate and conduct proceedings as laid out under this Policy. The IC will maintain a register / record to endorse the complaint received by it. The contents of the register shall be kept confidential and shared only for related purposes. Any employee may lodge a complaint of sexual harassment against any other employee to the Presiding Officer or to any member of the relevant internal committee.

Complaints may be submitted through written application, official email (poshicum@tamindia.com), or through the Government of India's SHe-Box portal, as applicable.

5A. SHe-Box (Sexual Harassment Electronic Box)

In addition to the Internal Committee (IC) mechanism provided under this Policy, an Aggrieved Woman may also avail the facility of the **Sexual Harassment Electronic Box (SHe-Box)**, an online complaint management system launched by the **Ministry of Women and Child Development, Government of India**, for reporting complaints of sexual harassment at the workplace.

SHe-Box provides a single-window platform for women working in the organized or unorganized sector, whether in the public or private sector, to register complaints relating to sexual harassment at the workplace.

SHe-Box Portal:

<https://shebox.wcd.gov.in>

Process for Filing a Complaint through SHe-Box

1. Visit the SHe-Box portal at <https://shebox.wcd.gov.in>.
2. Click on "**Register Your Complaint**".
3. Complete the online complaint form by providing the required details, including:
 - Name and contact details of the complainant;
 - Name and details of the organization/employer;
 - Details of the respondent;
 - Description of the incident(s) of sexual harassment;
 - Date(s) and location(s) of occurrence.
4. Upload supporting documents, evidence, or witness details, if available.
5. Submit the complaint electronically through the portal.
6. Upon submission, the complaint shall be forwarded by the concerned Government authority to the appropriate Internal Committee (IC) or Local Committee (LC), as applicable, for necessary action under the provisions of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013.
7. The complainant may track the status of the complaint through the SHe-Box portal using the credentials generated at the time of registration.

The availability of the SHe-Box mechanism shall not restrict or prejudice the right of an Aggrieved Woman to file a complaint directly with the Company's Internal Committee in accordance with this Policy.

SHe-Box Nodal Officer

The Company may designate a Nodal Officer for coordination of complaints received through the SHe-Box portal and for ensuring that the details of the Internal Committee, branch offices, and statutory reports are updated on the SHe-Box platform, wherever applicable under law.

6. Manner of inquiry into complaint:

Mode of filing and Number of copies of the Complaint to be submitted:

- a. Physical mode: At the time of filing the complainant, the Complainant shall submit six copies of the Complaint along with supporting documents and names and address of witness to the Committee.
- b. Electronic Mode: Complainant may address an email with the Complaint copy and all necessary documents attached therewith to the Committee.

Upon receipt of a complaint, the Internal Committee shall acknowledge the complaint and initiate action in accordance with the timelines prescribed under the Act and Rules.

The IC shall hand over a copy of the complaint to the person against whom complaint is made within 7 working days and give him / her opportunity to submit a written explanation if he / she so desires along with list of documents and list of witnesses within 10 days of receipt of the same.

IC shall have right to terminate inquiry proceedings or issue ex-parte decision in the complaint if the aggrieved woman and / or respondent without sufficient cause, fails to present themselves before the IC for three consecutive hearings convened by the IC. Such decision can be taken by the IC by giving notice of 15 days in advance to the party concerned.

i. Information necessarily included in a Complaint: A Complaint must comprise of the details:

- a. Date of the incident
- b. Time of the incident
- c. Location of the incident
- d. Details of the incident
- e. Name of Respondent
- f. Relationship between the Complainant and Accused
- g. Necessary supporting documents, including any documentary evidences
- h. List of witnesses

7. Inquiry Steps

- The IC will organise a meeting with the aggrieved woman to enquire into the matter and intimate date, time, and place of enquiry to all relevant persons.
- At the commencement of the inquiry the IC members shall explain to both the aggrieved woman and the respondent the procedure which will be followed in the Inquiry. The enquiry shall be conducted in accordance with the principles of natural justice.
- At the first meeting, the IC members shall hear the aggrieved woman and record the complaint. The aggrieved woman can also submit any corroborative material with a documentary proof, oral or written material, etc., to substantiate the complaint.
- Thereafter, the respondent shall be called for a deposition before the Committee and an opportunity will be given to him / her to give an explanation. It shall be recorded by the Committee.

- The aggrieved woman shall be provided with a copy of the written explanation submitted by the respondent.
- If the aggrieved woman or the respondent 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 Committee shall call upon witnesses mentioned by both the parties after ascertaining their relevance to the case.
- If the aggrieved woman and respondent desire to tender any documents by way of evidence before the IC, they shall supply original scanned/photocopy copies of such documents. Both shall affix their signature on the respective documents to certify these to be original copies.
- The IC depending upon the situation and circumstances shall provide every reasonable opportunity to the complainant and to the respondent, for putting forward and defending their respective case in the best possible way via examination of witnesses and cross examination.
- The IC is free to obtain / summon / enforce through the HR department and / or from the concerned department such information in the form of written communication, witnesses, previous records, and data of the concerned / relevant employees which may be helpful for the investigation. All employees and the organisation would cooperate in this regard. The committee can request external persons significant to the complaint to appear before it. The committee will have the right to ask any of the employees, vendors, contractors, agents, suppliers, consultants, retainers, probationers, trainees, apprentices or any such persons to appear before it.
- Respect of all the persons involved and confidentiality would be maintained throughout the investigation process. Likewise the complainant as well as the persons going through the process of an inquiry must maintain confidentiality of the matter.
- The venue of the inquiry should as far as practicable and be as per the convenience of the aggrieved woman.
- The enquiry shall be conducted in the language understood by the aggrieved woman and the respondent but the same would be recorded in the official language i.e. English.
- All proceedings of the IC will be recorded in writing. IC and individuals shall endorse their respective statements as token of authenticity. In case of refusal to endorse the same by either party the endorsement shall be made by the presiding officer with appropriate remarks.
- At any stage of the inquiry legal practitioners shall not be allowed to represent any of the parties before the IC.
- The inquiry will be completed within 90 days.

8. Interim Recommendations by the IC: (Relief to the Complainant)

During the course of the inquiry the IC for that period may recommend to the Management on the written request of the aggrieved woman to-

- (i) Transfer either the aggrieved woman or the respondent to any other workplace,
- (ii) Grant leave to the aggrieved woman up to 3 months (this leave would be in addition to the one ~~is~~ they are already entitled),
- (iii) Restrain the respondent from reporting on the work performance or confidential report of the aggrieved woman and assign the same to another officer,

(iv) Restrain the transfer of the aggrieved woman to any other place if she does not opt for such transfer,
(v) Issue a restraint order to warn the respondent that any attempt on his part, or by person(s) acting on his behalf, to contact or influence, or intimidate, or exert pressure on the complainant or witnesses may prove prejudicial to his case.

(vi) Person charged with sexual harassment to be kept away from work/ or sent on transfer till the time such enquiry is completed to avoid tampering of documents, pressure on the witnesses and the aggrieved woman.

The management shall implement the recommendation of the internal committee as stated hereinabove and send the report of such implementation to the internal committee.

9. Submission of Report:

- On completion of an inquiry a report of the findings would be submitted by the IC to the Management for further action within 10 days.
- Mention facts and finding in details, information and recommendations.
- The IC shall share a copy of the findings of the inquiry with the aggrieved woman and the respondent.
- The report of the IC shall be treated as an inquiry report and the management shall act upon the recommendations made by the IC in the report.
- The employer or district officer is obliged to act on the recommendations within 60 days of its receipt by him.

9A. Report / Recommendation by IC

When IC Committee arrives at the conclusion that the allegation against the respondent has been proved, it shall recommend to the employer to take appropriate disciplinary action as per the provision of the POSH Act and company's disciplinary policy which includes but not limited to the below mentioned disciplinary actions.

- Counselling
- Warning
- Written apology
- Bond of good behavior
- Stopping or withholding of increments/promotion
- Demotion
- Suspension
- Termination of the respondent.

The POSH Act also envisages payment of compensation to the aggrieved woman. The compensation payable shall be determined based on:

1. The mental trauma, pain, suffering and emotional distress caused to the aggrieved employee;
2. The loss in career opportunity due to the incident of sexual harassment;
3. Medical expenses incurred by the victim for physical/ psychiatric treatment;

4. The income and status of the alleged perpetrator; and Feasibility of such payment in lump sum or in installments.

In the event that the respondent fails to pay the aforesaid sum, IC may forward the order for recovery of the sum as an arrear of land revenue to the concerned District Officer

IC will recommend the above mentioned after considering and determining the totality of the circumstances.

The following should be practiced after a decision is taken;

1. IC shall keep complete and accurate documentation of the complaint, its inquiry and the decision thereof. The incident would be documented in both the aggrieved woman and the respondent's files with the full report of the IC.
2. In the event, the complaint does not fall under the purview of sexual harassment; the same would be dropped by the IC after recording the reasons thereof.

10. Appeal

Any party not satisfied or further aggrieved by the implementation or non-implementation of recommendations made, may appeal to the appellate authority in accordance with the Act and rules, within 90 days of the recommendations being communicated.

11. Malicious Allegations

Where the committee arrives at the 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 woman or any other person making the complaint has produced any forged or misleading document, it may recommend to the employer to take action against the woman or the person making the complaint.

12. Internal Committee :

The Complaints Committee also known as Internal Committee (IC) shall consist of a Presiding Officer (Senior level Woman employee) + members including external member as the core committee. Who shall investigate complaints of alleged sexual harassment and make recommendations to the appropriate Management Team.

A Quorum of three members is required to be present for the proceedings to be conducted in the Committee. The Quorum shall include the Presiding Officer and at least two members, out of which one Member shall be a woman.

No person who is a complainant, witness or defendant in the complaint of sexual harassment shall be a member of a Committee

Any internal Committee member charged with sexual harassment in a written complaint must step down as a member during the enquiry into that complaint.

In the Committee, not less than half of the number of members shall be women.

The Committee shall also have one person who is a nominee from a Non-Governmental Organization or any such person who is familiar with the subject of Sexual Harassment, as a third party Member.

13. Conciliation:

The purpose of the IC is to resolve/redress the complaint of the aggrieved woman. Hence, the first step by the IC before initiating an inquiry and at the request of the aggrieved woman, will be to make an attempt to resolve the raised issue through mutual discussion between the aggrieved woman and the respondent.

On the request of the aggrieved woman, the IC after making sure that the aggrieved woman is not opting for conciliation under any force / threat will take steps towards settling the matter between the aggrieved woman and the respondent. This will be done through the process of separate and joint meetings.- During the process of conciliation the IC will endeavour to resolve the matter and reach amicable resolution by means of meetings and discussions. No monetary settlement shall be made basis of the conciliation.

The IC will record the terms of settlement acceptable to the aggrieved woman and the respondent and shall provide copies of the settlement to the management team to take further action as per the recommendations recorded in the settlement. Copies of the settlement shall be provided to the aggrieved woman and the respondent. All persons involved in the conciliation will maintain the dignity and confidentiality of the persons involved. The aggrieved woman will have the right to withdraw from the conciliation process by stating the reasons for withdrawal to the IC.

Post the conciliation process, after the settlement is arrived, the IC will not do further enquiry in the complaint. If the conciliation does not stop the behaviour and / or if any of the terms mentioned in the settlement are not complied with, the IC shall proceed to make an enquiry into the complaint.

14. Confidentiality:

In accordance with Section 16 of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, strict confidentiality shall be maintained throughout the complaint, conciliation, inquiry and redressal process.

No person, including the Complainant, Respondent, witnesses, members of the Internal Committee, management personnel, employees, consultants, advisors, or any other person associated with the proceedings, shall publish, communicate, disclose, make known, circulate, or cause to be published any information relating to:

- a. The contents of the complaint of sexual harassment;
- b. The identity, name, address, designation, department, photograph, or any other particulars that may lead to the identification of the Aggrieved Woman, Respondent, witnesses, or Internal Committee members;
- c. Information relating to conciliation proceedings, inquiry proceedings, statements, evidence, documents, records, recommendations, findings, or deliberations of the Internal Committee;
- d. The recommendations of the Internal Committee;
- e. The action taken by the Employer pursuant to the recommendations of the Internal Committee.

Disclosure of the information referred to above shall be permitted only where:

- Such disclosure is required under any applicable law, court order, or direction of a competent authority;
- It is necessary for the implementation of the recommendations of the Internal Committee;
- It is made for the purpose of reporting statistical information without disclosing the identity of any person involved.

Any person found to have breached the confidentiality obligations under this Policy or Section 16 of the Act shall be liable for appropriate disciplinary action in accordance with the Company's policies, service rules, and applicable law.

The Company shall take all reasonable measures to ensure that records relating to complaints, inquiry proceedings, findings, recommendations, and actions taken are maintained securely and accessed only by authorized persons on a need-to-know basis

16. Miscellaneous:

I. PROTECTION AGAINST RETALIATION

Regardless of the outcome of the Complaint made in good faith, Employee lodging the Complaint and any person providing information as a witness will be protected from any form of retaliation. While dealing with Complaints of Sexual Harassment, the Committee shall ensure that the Complainant or the witness(es) are not victimized or discriminated against by the Accused. Any unwarranted pressures, retaliatory or any other type of unethical behavior from the Accused against the Complainant while the investigation is in progress should be reported by the Complainant to the Committee as soon as possible. Disciplinary action will be taken by the management against any such person who indulge in any such violation.

II. DOCUMENTATION

The Committee shall keep complete and accurate documentation of the complaint, its investigation and the resolution thereof. The incident would be documented in the files of Complainant and the Accused's along with the full report of the Committee.

III. OBLIGATION OF EMPLOYER/MANAGEMENT

The Group shall provide all necessary assistance for the purpose of ensuring full, effective and speedy implementation of the policy, constitution of Committee in accordance with the Policy and implementation of the recommendations made by Committee in an expeditious manner.

The Company shall conduct periodic POSH awareness and sensitization programmes for all employees, including contractual employees, trainees, interns and consultants. Orientation and capacity-building programmes shall also be conducted for Internal Committee members at regular intervals to ensure effective handling of complaints under the Act.

The Company shall prominently display at conspicuous places and on its internal communication platforms:

- I. POSH Policy;
- II. Names and contact details of Internal Committee members;
- III. Complaint filing mechanisms;
- IV. SHe-Box details and portal link;
- V. Consequences of sexual harassment under applicable law.

IV. IMPLEMENTATION OF THIS POLICY

The company will ensure that the Policy is widely disseminated to all employees, part time employees, interns, etc associated with the company. The Policy will be published on its policy website and displayed in a conspicuous place in the Workplace. It will also be included in the staff handbook. All new Employees must be trained on the content of the Policy as part of their induction into the organization. Every year employees will require to attend a refresher training on the content of this Policy.

V. OVERRIDING EFFECT

Notwithstanding anything stated elsewhere in this Policy, this Policy shall be subject to the provisions of the Act and rules made thereunder (including any amendments or re-enactments thereof).

Internal Committee Members at Mumbai Branch

Sr. No.	Name	Designation	Contact
1	Neha Gaurav Chamria	Company Secretary	neha.chamria@tamindia.com
2	Amita Naik	Assistant Manager HR	amita.naik@tamindia.com
3	Pranjali Banawalikar	Executive Assistant (Corporate)	pranjali@tamindia.com
4	Siddhi Chavan	Associate Manager S Group	siddhi.chavan@tamindia.com
5	Tejshree Surve	Executive	tejshree.surve@tamindia.com
6	Arjun Kalkar	Associate Director (S Group)	arjun.kelkar@tamindia.com
7	Ravindra Ratanjankar	COO, Head Of Vigilance, Procurement & Operations	ravi.ratanjankar@tamindia.com
8	Prasad Walawalkar	Sr. Vice President HR	prasad.walawalkar@tamindia.com
9	Lalitikumar Patil	TAM Legal	lalitikumar.patil@tamindia.com
10	Advocate Jyotsna Datar	External Member & POSH Trainer	jyotsna@demeterconsultants.in

Presiding Officer: **Neha Gaurav Chamria** (Company Secretary)

External Member: **Advocate Jyotsna Datar** (Posh Trainer and legal professional)

Internal Committee Members at Baroda Branch

Sr. No.	Name	Designation	Contact
1	Manisha Yadav	Executive - HR	manisha.yadav@tamindia.com
2	Khanjan Panicker	Associate General Manager – Operations	khanjan.panicker@tamindia.com
3	Sanchita Das	Asst. Manager – Operations	sanchita.das@tamindia.com
4	Hetal Solanki	Asst. Manager – Operations	hetal.solanki@tamindia.com
5	Dhanashree Padhye	Asst. Manager – Operations	dhanashree.padhye@tamindia.com
6	Ravi Ratanjankar	COO, Head Of Vigilance, Procurement & Operations	ravi.ratanjankar@tamindia.com
7	Prasad Walawalkar	Sr. Vice President - HR	prasad.walawalkar@tamindia.com
8	Saju Sugathan	Associate Director - HR	saju.sugathan@tamindia.com
9	Adv. Shital Upadhyay	Consultant - Legal	adv.shitalupadhyay@gmail.com

Khanjan Panicker is the Presiding Officer of this committee

Independent NGO representative is Adv. Shital Upadhyay, email id: adv.shitalupdhyay@gmail.com