



LICHFL Asset Management Company Limited

**POLICY FOR IMPLEMENTATION OF SEXUAL
HARASSMENT OF WOMEN AT
WORKPLACE (PREVENTION, PROHIBITION AND
REDRESSAL) ACT 2013**

LICHFL ASSET MANAGEMENT COMPANY LIMITED
POLICY FOR IMPLEMENTATION OF SEXUAL HARASSMENT OF WOMEN
AT WORKPLACE (PREVENTION, PROHIBITION AND REDRESSAL) ACT 2013

(APPROVED BY THE BOARD OF DIRECTORS ON 18TH JANUARY 2023
AND AMENDMENT APPROVED BY THE BOARD OF DIRECTORS ON 29TH
JUNE 2026)

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A. BACKGROUND

1. LICHFL Asset Management Company Limited (“**Company**”) is one of the Investment Management Companies managing Venture Capital/Alternative Investment Funds in India and has a workforce comprising both male and female employees.
2. The Company believes that everyone must get equal opportunity to work, regardless of caste, creed, religion & age. The Company believes in creating a safe and conducive work environment that enables all to work without fear of prejudice, gender bias and sexual harassment. The Company always strives to foster an atmosphere wherein employer and employees respect each other’s integrity and dignity, privacy and the right to equality and opportunity in the workplace.
3. The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 along with all amendments from time to time and Rules (“**Act**”) has been enacted by the Parliament.
4. Further, to ensure proper implementation of the Act, it is proposed that the Company should have a Board Approved Policy in place, incorporating the recent amendments made in the said Act.
5. In light of the above, this policy has been formulated against sexual harassment at workplace (“**Policy**”) as per the Act. All complaints of sexual harassment made by any woman against an employee of the Company shall be henceforth dealt under the provisions of this policy. Accordingly, while the Policy covers all the key aspects of the Act, for any doubt or further clarifications, references shall always be made to the provisions of the Act including any amendments made thereto.

B. OBJECTIVE OF THE POLICY

1. To ensure implementation of provisions of Act.
2. To provide protection against sexual harassment of women at workplace, for prevention and also for redressal of complaints of sexual harassment and matter connected therewith or incidental thereto in accordance with the Act.

C. DEFINITIONS

Unless the context otherwise requires and unless otherwise stated under the Act, the terms:

1. **“Aggrieved woman”** in relation to a Workplace means a woman of any age whether employed or not, who alleges to have been subjected to any act of Sexual Harassment by the Respondent. An aggrieved woman, apart from the Employee, would also include a visitor, customer, trainee, apprentice, auditor or tele-caller etc., at the Workplace who alleges to have been subjected to any act of Sexual Harassment by the Respondent.
2. **“District Officer”** means the officer notified by the appropriate Government under Section 5 of the Act for the purposes of discharging the functions and responsibilities assigned under the Act in the relevant district.
3. **“Employee”** means a person employed by the Company 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 Company, whether for remuneration or not, or working on 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;
4. **“Employer”** in relation to the Company would mean the Chief Executive Officer of the Company. Provided that where the Chief Executive Officer is the Respondent or the Aggrieved Woman in any proceeding under this Policy, references to the Employer shall, for the purposes of such proceeding, mean the Board of Directors of the Company or its authorized delegate.
5. **“Respondent”** means a person against whom the Aggrieved Woman has made a complaint.
6. **“Service Rules”** means LICHFL AMC Employees Terms, Conduct Rules, etc. 2017 (as amended from time to time) and any other terms of the employment or engagement agreed between the person concerned and the Company.
7. **“She Box Portal”** shall mean <https://shebox.wcd.gov.in/>;
8. **“Sexual Harassment”** includes any one or more of the following unwelcome acts or behaviour (whether directly or by implication) namely:
 - a) physical contact and advances; or
 - b) a demand or request for sexual favours; or
 - c) making sexually coloured remarks; or
 - d) showing pornography; or
 - e) any other unwelcome physical, verbal or non-verbal conduct of sexual nature.

The following circumstances, among others, if they occur, or are present in relation to or connected with any act or behaviour of Sexual Harassment may amount to Sexual Harassment:

- a) Implied or explicit promise or preferential treatment in her employment; or
 - b) Implied or explicit threat of detrimental treatment in her employment; or
 - c) Implied or explicit threat about her present or future employment status; or
 - d) Interference with her work or creating an intimidating or offensive or hostile work environment for her; or
 - e) Humiliating treatment likely to affect her health or safety.
9. **“Workplace”** means any office of the Company which is established (within or outside India), owned or controlled by the Company. It will also include any place visited by the Employee arising out of or during the course of employment including transportation by the Employer for undertaking such journey. It will also include the place where all the Company-related activities are performed at any other site away from the Company office and any virtual space (including WhatsApp, Microsoft Teams, email platforms, video conferencing platforms and similar electronic communication platforms), social, business or other functions where the conduct or comments may have an adverse impact on the Workplace or Workplace relations.

D. CONSTITUTION OF INTERNAL COMMITTEE & ITS POWER

1. The Employer shall, by an order in writing, constitute a Committee to be known as the “Internal Committee” (“**Internal Committee**”) comprising of a minimum of 4 members to receive and consider complaints relating to Sexual Harassment at Workplace.
2. The Internal Committee shall consist of the following members:
 - a) The Presiding Officer who shall be a woman employed at a senior level at Workplace from amongst the Employees. In case a senior level woman employee is not available, the Presiding Officer shall be nominated from other offices or administrative units of the Company. In case the other offices or administrative units of the Workplace 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.
 - b) At least 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.
 - c) 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 or a person who has expertise on issues relating to Sexual Harassment and may include a social worker with at least 5 years’ experience in the field of social work which leads to creation of societal conditions favourable towards

empowerment of women and in particular in addressing workplace Sexual Harassment or a person who is familiar with Labour, Service, Civil or Criminal Law.

- d) At least half of the total members of the Internal Committee shall be women.
3. No inquiry proceedings shall be conducted unless a minimum of three members of the Internal Committee, including the Presiding Officer and the External Member, are present.
4. Tenure:
- a) The members of the Internal Committee shall hold office for a period not exceeding three (3) years from the date of their nomination/appointment. Any member may be re-appointed from time to time, subject to continued eligibility and compliance with the provisions of the Act.
- b) Any External/ Internal Member of Internal Committee at one place, can be nominated as a member of Internal Committee of some other office after completion of his/ her tenure in previous Internal Committee.
5. Any vacancy created in the Internal Committee due to cessation of employment, resignation, death, disability or removal as applicable, shall be filled by a fresh nomination in accordance with these guidelines and in conjunction with provision of the Act (where applicable).
6. The Internal Committee shall be formed at corporate office of the Company situated at 211-212, A Wing, The Capital, Bandra Kurla Complex, Bandra East, Mumbai - 400051 as per the guidelines mentioned above. The Internal Committee constituted by the Company may also be separately constituted for any other office, branch or administrative unit of the Company, with the same composition of members, subject to compliance with the Act and the rules made thereunder.
7. The members of the Internal Committee shall be entitled to the following allowance for holding the proceedings of the Internal Committee and, also, reimbursement of travel cost incurred in travelling by train in three tier air conditioned or by air conditioned bus or auto rickshaw or taxi, or the actual amount spent by them on travel, whichever is less.
- a) For Presiding Officer – Rs. 1000/- (Rupees One Thousand Only) per day.
- b) For members (including NGO) of Internal Committee - Rs. 750/- (Rupees Seven Hundred and Fifty Only) per day.
8. The Internal Committee for the purpose of making an enquiry 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:

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

E. PROCEDURE FOR MAKING COMPLAINT

1. The Aggrieved Woman is required to make a complaint of Sexual Harassment at Workplace in writing by email or by hand or through the She-Box Portal to the Internal Committee within a period of three (3) months from the date of incident and in case of a series of incidents, with a period of three (3) months from the date of last incident. Provided further, that the Internal Committee may, for reasons to be recorded in writing extend the time limit not exceeding three (3) months, if it is satisfied that the circumstances were such which prevented the woman from filing a complaint within the said period.
2. If the complaint cannot be made in writing by the Aggrieved Woman, then any member of the Internal Committee shall render all reasonable assistance to the Aggrieved Woman for making the complaint in writing.
3. If the Aggrieved Woman is unable to make a complaint on account of her physical incapacity a complaint may be filed, with the consent of the Aggrieved Woman, by:
 - a) Her relative or friend; or
 - b) Her co-worker; or
 - c) An officer of the National Commission for Women or State Women's Commission; or
 - d) Any person who has knowledge of the incident.
4. If the Aggrieved Woman is unable to make a complaint on account of mental incapacity, a complaint may be filed by:
 - a) Her relative or friend; or
 - b) A special educator; or
 - c) A qualified psychiatrist or psychologist; or
 - d) The guardian or authority under whose care the Aggrieved Woman is receiving treatment or care; or
 - e) Any person who has knowledge of the incident jointly with the Aggrieved Woman relative or friend or a special educator or qualified psychiatrist or psychologist, or guardian or authority under whose care the Aggrieved Woman is receiving treatment or care.

5. If the Aggrieved Woman 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.
6. If the Aggrieved Woman is dead, a complaint may be filed by any person who has knowledge of the incident, with the written consent of her legal heir.
7. Any Aggrieved Woman who is not in a position to access the Internal Committee could seek advice or file her complaint through the modes mentioned below. If any Aggrieved Woman approaches any of the legal services institutions, the personnel at those institutions would assist such an Aggrieved Woman to file the complaint either before the Internal Committee, as the case may be, and in cases where necessary, will also assist such an Aggrieved Woman to approach the local police station.
8. The three ways in which an Aggrieved Woman can approach the legal services institutions for the purpose of making a complaint or to seek advice in such matters are:
 - a) Legal services clinics and para-legal volunteers (PLVs);
 - b) Legal helpline (15100 – NALSA helpline number); and
 - c) Legal services management system, the details of which are available on National Legal Services Authority (NALSA)'s website.
9. Any of the persons referred to above, who may file a complaint on behalf of the Aggrieved Woman shall be referred to as the “Complainant.” Any reference to the term “Complainant” throughout this Policy shall mean reference to “Aggrieved Woman” and / or the “Complainant” as applicable.
10. At the time of filing the complaint, the complainant shall submit six (6) copies of the complaint along with supporting information and documents as below:
 - a) The event(s) of Sexual Harassment, matter or issue that is subject to the complaint (time/date/place etc.);
 - b) The name and details of the Respondent against whom the complaint is being filed;
 - c) Names and addresses of the witnesses (if any);
 - d) Details of documentary evidence (if any) such as digital chat records, SMS, E-mails, CCTV Footage, Audio / Video recording, etc.; and
 - e) Such other information / documents which would be necessary to substantiate the complaint.

F. MANNER OF CONCILIATION

The Internal Committee shall, before initiating an Inquiry and at the written request of the Complainant, take steps to settle the matter between the Complainant and the Respondent through conciliation. The following need to be kept in mind with respect to conciliation:

- a) It is not mandatory for Complainant to request or agree for the Conciliation.
- b) In case a settlement has been arrived at, the Internal Committee shall record it and forward it to the Employer to take action as specified in the recommendation of the Internal Committee.
- c) The Internal Committee shall also provide copies of the settlement as recorded to the Complainant and the Respondent.
- d) If conciliation has been reached, the Internal Committee shall not be required to conduct any further inquiry.
- e) Monetary settlement cannot be made as a basis of such conciliation.
- f) If Complainant feels that the terms of settlement are not being complied with by the Respondent, Complainant can make a written complaint to the Internal Committee to conduct an inquiry into the complaint.

G. MANNER OF INQUIRY INTO COMPLAINT

1. If the Complainant does not wish to go for conciliation or if the terms of settlement reached between the parties during the conciliation is not complied with, the Internal Committee shall, upon a written request from the Complainant to do so, proceed to make inquiry into the complaint according to the LICHFL AMC's Policy for Implementation of Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act 2013 (amended from time to time).
2. On receipt of the complaint, the Internal Committee shall send one of the copies received from the Aggrieved Woman to the Respondent within a period of seven (7) working days. If the complaint has been received on email, the Internal Committee member shall forward the same to the Respondent, with clear instructions that the same is not to be shared with anyone and strict confidentiality must be maintained.
3. The Respondent shall file the reply to the complaint along with the list of documents / evidence and names and addresses of the witnesses (if any) within a period not exceeding ten (10) working days from the date of receipt of the copy of complaint / documents by the Respondent. Subsequently, if the Complainant or the Respondent desires any witness/es to be called, or desires to tender any documents by way of evidence before Internal

Committee, apart from what is mentioned in complaint / reply, she / he shall communicate in writing to Internal Committee the names of witness/es to whom she/he proposes to call or she/he shall supply copies of such documents with her/his signature affixed on the respective documents to certify the authenticity.

4. The Internal Committee shall make enquiry into the complaint in accordance with the principles of natural justice.
5. The Internal Committee shall have the right to terminate the enquiry proceedings or to give an ex-parte decision on the complaint, if the Complainant or Respondent fails, without sufficient cause, to present himself for the three (3) consecutive hearings convened by the Presiding Officer. Provided that such termination or ex-parte order may not be passed without giving a notice, in writing, fifteen (15) days in advance, to the party concerned.
6. The parties shall not be allowed to bring in any legal practitioner to represent them in their case at any stage of the proceedings before the Internal Committee.
7. In conducting the enquiry, a minimum of three (3) Members of the Internal Committee including the external member and Presiding Officer shall be present.
8. The Inquiry should be completed within a period not exceeding ninety (90) days.
9. The Internal Committee shall notify, in writing, the time and dates of its meetings to the Complainant, the Respondent and witnesses.
10. The Internal Committee may conduct meetings, hearings, recording of statements, witness examinations and inquiry proceedings through virtual or electronic means, including video conferencing platforms, wherever considered appropriate.
11. No person other than the parties, witnesses and members of the Internal Committee shall ordinarily be permitted to participate in the inquiry proceedings, except where the Internal Committee determines otherwise for reasons to be recorded in writing.
12. If the Complainant is an employee of the Company the inquiry into the complaints of Sexual Harassment at Workplace should be held at the Workplace of the Complainant, where the witnesses and oral/ documentary evidence would be readily available and in other cases at the Workplace of the Company.
13. Inquiry proceedings shall be minuted / recorded in writing. They may be audio recorded as well (wherever possible). The minutes / transcribed record of the proceedings and the statement of witnesses shall be endorsed by the persons concerned and Internal Committee in token of authenticity thereof.
14. All witnesses who are part of the Internal Committee proceedings may need to sign a confidentiality declaration.

H. ACTIONS THAT CAN BE TAKEN DURING PENDENCY OF INQUIRY

1. During the pendency of an inquiry, on a written request made by the Complainant, the Internal Committee may recommend to the Employer any of the following:
 - a) To grant leave to the Complainant up to a period of three (3) months (the leave granted shall be in addition to the leave the Complainant is otherwise entitled to;
 - b) To transfer the Complainant or Respondent to any other workplace;
 - c) To restrain the Respondent from reporting on the work performance of the Complainant or writing his/her confidential report / work appraisal and assign the same to another official (if applicable);
 - d) In case the complaint has been filed by an intern or an apprentice or a trainee working under the Respondent, restrain the Respondent from supervising such activity of the Complainant and assign the same to another Official.
 - e) To direct the Respondent not to communicate with the Complainant in any manner including any mode of electronic communication such as text messages, emails, video/audio calls, on any social media platform or via any other mode of electronic communication.
 - f) In case complaint is filed by a person other than the Aggrieved Woman, the aforesaid provisions would apply mutatis mutandis, depending on facts and circumstances of each complaint.
2. The Employer reserves the right to require any of the parties to take any leave during pendency of inquiry any time after receipt of a complaint of Sexual Harassment until the Internal Committee has concluded its inquiry, if required, based on recommendation of Internal Committee. Any such decision will be communicated in writing to the party by the Employer. This is to ensure that there is no retaliation against any party. The Employer reserves the right to require parties to work from home or from an alternate location during the pendency of inquiry based on the recommendation of the Internal Committee.
3. The Employer shall implement the aforesaid recommendations of the Internal Committee and send / submit a report of such implementation to the Internal Committee.

I. INQUIRY REPORT AND FURTHER ACTIONS

1. Within a period of ten (10) days from the date of completion of the inquiry, the Internal Committee shall prepare and provide a report of its finding to the Employer and the

concerned parties. The report shall specify details of the allegations against the Respondent, the statements made and evidence presented by the Complainant, Respondent and / or witnesses, Internal Committee's findings along with a statement giving reasons for the findings arrived at by the Internal Committee.

2. If the Internal Committee arrives at the conclusion that the allegations against the Respondent have not been proved, then it shall report that no action is required to be taken in the matter.
3. If the Internal Committee arrives at the conclusion that the allegations against the Respondent have been proved, the Internal Committee shall after taking into account the gravity of the act, recommend to Employer to take any of the following actions (including combinations thereof) against the Respondent:
 - a) Proceed as if the Sexual Harassment acts of the Respondent constitute acts of misconduct as per applicable Service Rules.
 - b) Deduct from the salary or wages of the Respondent such sum as may be determined by the Internal Committee and pay the same as compensation to the Aggrieved Woman or to her legal heirs in accordance with the Act. If the Employer is unable to make deductions from the salary / wages due to Respondent's absence or cessation from employment; or if the Respondent fails to pay the said sum, then the Internal Committee may forward the order of recovery of the sum as arrear of land revenue to the concerned District Officer under the Act.
4. In case the Service Rules does not deal with the actions to be taken against the Respondent, then without prejudice to the action under Clause 3(b), the Employer shall take any of the following actions (including combinations thereof) against the Respondent:
 - a) Direct the Respondent to issue a written apology.
 - b) Issue a warning, reprimand or censure, against the Respondent.
 - c) Withhold the Respondent's promotion, pay rise or increments.
 - d) Terminate the Respondent from service.
 - e) Direct the Respondent to undergo a counselling session or carry out community service.
5. Where the Internal Committee arrives at a conclusion that the allegations against the Respondent are malicious or the Aggrieved Woman has made a false complaint or has produced a forged or misleading information/document, it may recommend taking appropriate action against the Complainant in accordance with the Service Rules. If the

Service Rules do not deal with the aforesaid scenario, then the Internal Committee may recommend to the Employer, to take action in accordance with Clause (I)(4).

6. Mere inability to substantiate a complaint or provide adequate proof need not attract action against the Complainant under this section. Where the Internal Committee arrives at the conclusion that during the enquiry any witness has given false evidence or produced any forged or misleading documents, it may recommend taking appropriate action against the concerned person(s) including such actions as stated under Clause I(3) above.
7. After receiving the recommendations of the Internal Committee, the Employer shall send a copy of such recommendations to the Aggrieved Woman and the Respondent and ask to submit their comments, if any.
8. The Employer shall act upon the recommendation given by Internal Committee within sixty (60) days of receipt of the recommendation.

J. CONFLICT OF INTEREST AND RECUSAL

Any member of the Internal Committee who has a conflict of interest, bias, personal involvement, supervisory relationship, prior involvement in the subject matter of the complaint, or any circumstance giving rise to a reasonable apprehension of bias, shall disclose the same and recuse themselves from the proceedings. The Employer shall nominate another eligible member for such proceedings, in accordance with the provisions of the Act.

K. PROCEDURE FOR APPEAL

The person aggrieved (including both the Complainant and the Respondent (s)) by the recommendation of Internal Committee or non-implementation of such recommendations by the Employer shall prefer an appeal within a period of ninety (90) days from the date of the recommendations/order/action to the appellate authority prescribed under the Service Rules. In the absence of the appellate provisions not available under the Service Rules, the person aggrieved shall prefer an appeal before the appellate authority notified under Section 2(a) of the Industrial Employment (Standing Orders) Act, 1946. Employees are encouraged to avail the grievance redressal mechanism provided under this Policy. However, nothing contained in this Policy shall restrict or prejudice the right of any person to seek remedies available under applicable law.

L. THIRD PARTY HARASSMENT

Where the Sexual Harassment occurs as a result of an act or omission by any third party or outsider, the Employer will take all steps necessary and reasonable to assist the affected person in terms of support and preventive action.

M. CONFIDENTIALITY

1. The contents of the complaint made, the identity and address of the Aggrieved Woman, the Respondent, the witnesses, any documents / information relating to conciliation and inquiry, proceedings, recommendation of Internal Committee and the action taken by the Employer shall be kept confidential by all persons concerned. Except as permitted under the Act, such information / documents will not be published, communicated or made known to the public, press and media in any manner.
2. If any person breaches confidentiality, they shall be liable for penalty as prescribed under the Service Rules. In the absence of the relevant provisions under the Service Rules, the person shall be liable Rs.5,000/- (Rupees Five Thousand Only) for disciplinary action.

N. PROTECTION TO COMPLAINANT / WITNESSES

The Company is committed to ensuring that no Aggrieved Woman who lodges a complaint of Sexual Harassment at Workplace or who forwards a harassment concern is subjected to any form of reprisal or retaliation. Any reprisal or retaliation by any Employee will be subject to disciplinary action. The Company will ensure that the Complainant 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 appropriate action.

O. MANDATORY DISCLOSURE OF COMPLIANCE

A statement has to be given in the Board's Report confirming that the Company has complied with provisions relating to the constitution of Internal Committee under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act. Such disclosures shall include, to the extent required under law, the number of complaints of sexual harassment received during the financial year, disposed of during the financial year and pending for more than ninety (90) days, along with any other information required to be disclosed from time to time. The Company shall comply with all such reporting and disclosure requirements.

P. EMPLOYER'S RESPONSIBILITIES

The Company shall:

1. Provide a safe working environment at the Workplace which shall include safety from the persons coming into contact at the Workplace.
2. Treat Sexual Harassment as misconduct and take appropriate action for the same.
3. Maintain discipline amongst those under their responsibility and discourage inappropriate behaviour.
4. Organize workshops and awareness programs at regular intervals for sensitizing Employees with the provisions of the Policy and the Act.
5. Conduct orientation programmes for the members of the Internal Committee.
6. Assist in securing the attendance of Respondent and witnesses before the Internal Committee.
7. Make available such information to the Internal Committee, as it may require having regard to the Complaint filed by the Aggrieved Woman.
8. Provide assistance to the Aggrieved Woman if she so chooses to file a complaint in relation to the offence under the Bharatiya Nyaya Sanhita (BNS), 2023 or any other law for the time being in force.
9. Cause to initiate action, under the Bharatiya Nyaya Sanhita (BNS), 2023 or any other law for the time being in force, against the perpetrator, or if the Aggrieved Woman so desires, where the perpetrator is not an Employee, in the Workplace at which the incident of Sexual Harassment took place.
10. Monitor the timely submission of reports by the Internal Committee.
11. Ensure that Order constituting the Internal Committee under sub section (1) of Section 4 is displayed at any conspicuous place in the Workplace. The details of the Internal Committee along with the penal consequences of sexual harassment will also to be displayed as per notice mentioned below:

NOTICE

Sexual Harassment at Workplace is prohibited and is punishable under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and the Company's internal policies. Any person aggrieved by an act of Sexual Harassment at Workplace may make a complaint to the Internal Committee constituted by the Company. Such acts may also result in disciplinary action, penalties, including termination of employment.

Company Name:	LICHFL Asset Management Company Limited
Company's Corporate Address:	{{Registered Address of the Company}}
Company's Contact Number and E-mail ID:	{{Contact Number}}, {{Company's Official E-mail ID}}
Contact Person Name and E-mail ID:	{{Name of Authority-in Charge}} {{E-mail of the Authority-in Charge}}

Sr. No.	Post of Committee Members	Name	Designation	Contact Information
1.	Presiding Officer	{{Name of the Presiding Officer}}	{{Designation of the Presiding Officer}}	{{E-mail Id of the Presiding Officer}} {{Contact Number of the Presiding Officer}}
2.	Member	{{Name of the Member 1}}	{{Designation of the Member 1}}	{{E-mail Id of Member 1}} {{Contact Number of Member 1}}
3.	Member	{{Name of the Member 2}}	{{Designation of the Member 2}}	{{E-mail Id of Member 2}} {{Contact Number of Member 2}}
4.	Member	{{Name of the Member 3}}	{{Designation of the Member 3}}	{{E-mail Id of Member 3}} {{Contact Number of Member 3}}
5.	External Member	{{Name of the External Member}}	{{Designation of the External Member}}	{{E-mail Id of External Member}} {{Contact Number of External Member}}

By Order
For LICHFL Asset Management Company Limited

Q. EMPLOYEES' RESPONSIBILITIES

Every Employee shall:

1. Be mindful of professional and personal boundaries while performing the duties for the Company and while representing the Company.
2. Note that if someone does not object or decline to Sexual Harassment behaviour in the Workplace at the time, the same shall not mean that they are consenting to the behaviour or that the conduct is welcome.
3. Support and fully cooperate during any inquiry of a complaint, including testifying as witness and giving full and truthful disclosure of all factual information when asked by the Internal Committee, while ensuring that complete confidentiality is maintained throughout, about any complaint of sexual harassment within Company.
4. With respect to virtual working and/or using the internet:
 - a) Ensure that video/audio calls are scheduled during working hours as much as possible, a professional dress code to be followed and the background used during video calls should not contain inappropriate or offensive content.
 - b) Seek consent of the concerned Employee before requesting for a video call for one on one conversation.
 - c) Remember that while on video /audio calls, to be mindful of the professional boundaries, and not to initiate conversations/jokes that could make others uncomfortable.

R. INTERNAL COMMITTEE'S RESPONSIBILITIES

The Internal Committee shall:

1. Ensure that Inquiry is completed in a time bound manner and in accordance with the Act. Prepare and submit an annual report to Employer and to the concerned District Officer with the following details:
 - a) Number of complaints of Sexual Harassment received in the year.
 - b) Number of the complaints disposed of during the year.
 - c) Number of the cases pending for more than ninety days.
 - d) Number of Workshops or awareness programme against sexual harassment carried out.
 - e) Nature of action taken by the Employer.

2. Ensure that a cost register shall be maintained at the corporate office of the Company for accounting expense incurred/remuneration paid while holding Internal Committee Meetings for disposal of any case.
3. Ensure that the annual report shall also be uploaded in the She Box Portal as required under law.

S. MAINTENANCE OF RECORDS

The Company shall maintain records relating to complaints, inquiry proceedings, recommendations, actions taken and annual reports in accordance with applicable law and internal document retention policies, while ensuring confidentiality obligations under the Act.

T. CRIMINAL PROCEEDINGS

The proceedings under this Policy are independent of any criminal proceedings and may continue notwithstanding any police complaint, criminal case or parallel legal proceedings arising out of the same facts.

U. DATA PRIVACY

All personal data collected during proceedings shall be processed and protected in accordance with applicable data protection and privacy laws and internal information security policies.

V. GENDER NEUTRALITY

While the provisions of the Act are applicable only to complaints made by women as defined under the Act, the Company may, at its discretion, refer complaints of inappropriate conduct or harassment made by persons of any gender to the Internal Committee or any other committee constituted by the Company, and such complaints may be dealt with in accordance with principles contained in this Policy, the Company's code of conduct and applicable employment policies.

W.AMENDMENTS

The Company reserves the right to amend the Policy from time to time in order to comply with any laws / rules / regulations that come into effect from time to time, related to Sexual Harassment at workplace. This Policy shall be reviewed as and when key issues get raised to incorporate amendments. In case of any dispute with the law and the Policy, the law shall prevail.

All concerned persons are required to comply with this Policy and the provisions contained herein.

**_*_*_*_

Director & Chief Executive Officer