

Policy on Prevention and Redressal of Sexual Harassment at the Workplace

1. Background and Foundation

Sarvagaram Fincare Private Limited (“**Company**”) is committed to creating a conducive work environment in which its Employees (*as defined below*) feel safe and secure from any form of harassment and where all Employees are treated with dignity and respect. The Company has zero tolerance for any form of harassment including harassment based on race, religion, creed, nationality, ethnic origin, gender, sexual orientation and particularly Sexual Harassment (*as defined below*). Sexual Harassment at the Workplace (*as defined below*) or any other place if involving the Employees is a grave offence and is, therefore, punishable. The Company views Sexual Harassment in any form as an extremely serious offence and it may result in disciplinary actions including and up to termination of employment of the Employee against whom such Complaint of Sexual Harassment has been made.

This Policy (*as defined below*) takes complete cognizance of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, and shall be revised to adhere with any modifications to the same, that may be introduced from time to time.

The Company shall adopt certain procedures and guidelines to govern cases against Sexual Harassment. The procedure has been provided below. All allegations of Sexual Harassment shall be taken seriously by the Company and shall be governed by this Policy. This Policy extends to all Employees of the Company and is deemed to be incorporated in the service conditions of all Employees and comes into effect immediately.

All Employees are required to read and familiarize themselves with their rights and responsibilities under this Policy.

2. Objectives

- 2.1 The objective of this Policy is to clearly promote that the Company is committed to create a Workplace that is free from all forms of sexual harassment, intimidation and exploitation and to lay guidelines in case of occurrence of any such activity in the Workplace or other settings.
- 2.2 To lay down expectations of conduct at the Workplace with respect to prevention of Sexual Harassment and to establish the procedure of inquiry and redressal of complaint if the expectations are not met or guidelines are violated.
- 2.3 To specify a practical definition of Sexual Harassment in the Workplace keeping in mind the letter and spirit of the POSH Act (*as defined below*) and also describe the complain process in case of a case that falls within the ambit of the definition of Sexual Harassment.
- 2.4 To identify the obligations, responsibilities and rights of the stakeholders who are a part of the process.

- 2.5 While this Policy sets forth the Company's goals of promoting a Workplace that is free of Sexual Harassment, the Policy is not designed or intended to limit the Company's authority to discipline or take remedial action for Workplace conduct which the Company deems unacceptable, regardless of whether such conduct satisfies the definition of Sexual Harassment.

3. Application

- 3.1 This Policy is applicable to all regular and non-regular personnel including Employees regardless of the position, gender, sexual orientation, level, function, seniority, status or other protected characteristics and includes those personnel who are on contract with the Company.
- 3.2 The Policy will also cover temporary employees, trainees, interns, consultants, contractors, vendors, outsourced staff and customers of the Company.
- 3.3 The Policy will remain applicable wherever such persons have occasion to interact with each other (including for example, in vehicles, third party premises, off site meetings and public venues while at the Workplace or while conducting business with the Company, as the case may be).
- 3.4 It covers Sexual Harassment of women by men, of men by women and Sexual Harassment between persons of the same gender and Sexual Harassment of persons of neutral gender. Sexual Harassment of an individual is unlawful irrespective of who is involved in such behavior.

4. Definitions

- 4.1 "**Accused**" is the individual (regular employee, vendor, contractor, temporary employee, trainee, intern and/or customer) who is alleged to have committed an act of sexual harassment.
- 4.2 "**Aggrieved Party/ Complainant**" means any person whether employed by the Company or not, who alleges to have been subjected to an act of sexual harassment by the Accused. This would include visitors or guests at Workplace.
- 4.3 "**Appellate Authority**" shall mean the appellate authority notified under clause (a) of Section 2 of the Industrial Employment (Standing Orders) Act, 1946.
- 4.4 "**Complaint**" shall mean a complaint filed by a Complainant (or such Complaint being filed by any other person on behalf of a Complainant) on account of Sexual Harassment of the Complainant.
- 4.5 "**Complainant**" is an individual (regular employee, vendor, contractor, temporary employee, trainee, intern and/or customer) who raises an allegation of Sexual Harassment having been committed against the individual by another individual.

- 4.6 “**Employee**” shall mean any person employed at a workplace for any work on regular, temporary, ad hoc 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 any other person, called by any other such name.
- 4.7 “**Internal Complaints Committee/ ICC**” shall mean the committee constituted under Clause 4 of this Policy by the Company to inquire into the allegations of sexual harassment made by a Complainant at the Workplace.
- 4.8 “**Policy**” shall mean this policy notified by the management of the Company as the Company’s Policy on Prevention and Redressal of Sexual Harassment at the Workplace.
- 4.9 “**POSH 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.
- 4.10 “**Presiding Officer**” shall be a senior level woman employee who is the chairperson of the Internal Complaints Committee.
- 4.11 “**Sexual Harassment**” includes any one or more of the following un-welcome acts (whether directly, indirectly or by implication):
- 4.11.1 Any unwelcome sexually determined behavior, or pattern of conduct, that would cause discomfort and/or humiliate a person at whom the behavior or conduct was directed namely:
- a) Physical contact or advance, of a sexual nature or otherwise, including (but not limited to) touching, stalking, sounds which have explicit and/ or implicit sexual connotation/overtone, molestation;
 - b) A demand or request for sexual favours;
 - c) Advances involving verbal, non-verbal, or physical conduct such as sexually coloured remarks, letters, phone calls, e-mail, gestures, lurid stares, physical contact or molestation, stalking, indecent exposure, physical contact, sounds, display of pictures, intrusive questions about a person’s private life or body, signs, insults or taunts based on sex, obscene communication, verbal or non-verbal communication which offends the individual’s sensibilities and affect her/ his performance;
 - d) Showing, displaying or circulating pornography, making or posting vulgar / indecent / sexual pranks, teasing, jokes, demeaning or offensive pictures,

cartoons or other materials through email, SMS, MMS, gestures etc.;

- e) Display of pictures, signs etc. with sexual nature/ connotation/ overtones in the work area and work-related areas;
- f) Repeatedly asking to socialize during off-duty hours or continued expressions of sexual interest against a person's wishes;
- g) Giving gifts or leaving objects that are sexually suggestive;
- h) Eve teasing, innuendos and taunts, physical confinement against one's will or any such act likely to intrude upon one's privacy, persistent watching, following, contacting of a person;
- i) Any other un-welcome physical, verbal or non-verbal conduct of a sexual nature.
- j) Indulging in any act of omission or commission as provided herein above, shall be deemed to be "Misconduct" under the service rules of the Company.

4.11.2 The following circumstances if they occur or are present in relation to any sexually determined act or behaviour would amount to Sexual Harassment:

- a) implied or explicit promise of preferential treatment in his/ her employment;
- b) implied or explicit threat of detrimental treatment in his/ her employment;
- c) implied or explicit threat about his/ her present or future employment status;
- d) interference with his/ her work or creating an intimidating or offensive or hostile work environment for him/ her;
- e) humiliating treatment likely to affect his/ her health or safety.

4.11.3 Sexual Harassment includes unwelcome/ unwanted physical, verbal or non-verbal conduct and/ or behavior, illustrated but not limited to the examples listed as follows:

- a) Physical conduct of a sexual nature, which includes all unwanted physical contact, ranging from touching to sexual assault and rape.
- b) Verbal forms of sexual harassment include unwarranted innuendoes, suggestions and hints, sexual advances, comments with sexual overtones, sex-related jokes or insults or unwelcome graphic comments about a person's body made in their presence or directed toward them, unwelcome and inappropriate enquiries about a person's sex life, and unwelcome whistling directed at a person or group of persons.

- c) Non-verbal forms of sexual harassment include unwelcome gestures, indecent exposure, and the unwelcome display of sexually explicit pictures and objects.
- d) Quid pro quo harassment occurs where an owner, employer, supervisor, member of management or co-employee undertakes or attempts to influence the process of employment, promotion, training, discipline, dismissal, salary increment or other benefit of an employee or job applicant, in exchange for sexual favors.
- e) Sexual favoritism exists where a person who is in a position of authority rewards only those who respond to his/ her sexual advances, whilst other deserving employees who do not submit themselves to any sexual advances are denied appropriate promotions, merit rating or salary increases.

4.12 “**Workplace**” shall mean all office premises of the Company, including all branches or units established, owned, controlled by the Company and also covers places visited by Employees during the course of employment or for reasons arising out of employment including off-site team meetings/events and transportation provided by the Company for the purpose of commuting to and from the place of employment.

5. Constitution of Internal Complaints Committee

- 5.1 An Internal Complaints Committee shall be constituted at each location/ state, where the Company has its presence, to prevent instances of Sexual Harassment and to receive and effectively deal with complaints pertaining to the same. Every Complaint received shall be forwarded to the Internal Complaints Committee formed under this Policy for redressal. The investigation shall be carried out by the Internal Complaints Committee constituted for this purpose.
- 5.2 The Internal Complaints Committee at each location/ state shall be constituted of the following members as nominated by the Company:
- a) A woman employee employed at a senior level amongst the employees shall act as Presiding Officer of the Internal Complaints Committee. In the event that a senior level woman employee is not available at a particular location, the Presiding Officer shall be nominated from other locations/ offices of the Company;
 - b) Not less than 2 (two) members from amongst employees preferably committed to the cause of women **or** who have had experience in social work **or** have legal knowledge;
 - c) 1 (one) member shall be from amongst non-governmental organizations **or** associations committed to the cause of women **or** a person familiar with the issues relating to sexual harassment.

Atleast 50% of the representatives of the Internal Complaints Committee shall be women. A minimum quorum of 3 (three) members is required to be present for the proceedings to take place and a majority of them shall be ladies. The Internal Complaints Committee shall have a chairperson for the proceedings.

- 5.3 The names and contact details of the members of the Internal Complaints Committee is as per **Annexure 1** of this Policy and any change in such composition shall be effected in the Policy.
- 5.4 At least half the total members of the Internal Complaints Committee have to be women. The Presiding Officer and every member of the Internal Complaints Committee shall hold office for such period, not exceeding 3 (three) years, from the date of their nomination as may be specified by the Company.

6. Redressal Procedure

- 6.1 All matters of harassment will be treated with sensitivity and discussed only with parties that have a legitimate business need-to-know. Confidentiality is very important and will be maintained to the extent permitted by the circumstances. Complaints will be promptly investigated and appropriate action will result. Steps will be taken to ensure that the Complainant does not face retaliation as a result of bringing the Complaint to the attention of management or the human resources department of the Company.

6.2 Complaint

- 6.2.1 Any Complainant may lodge a written Complaint against an Accused to/ through any of the following channels within 3 (three) months from the date of the incident (or the date of the last incident, in case of a series of incidents). The Internal Complaints Committee may, for reasons to be recorded in writing, extend the time limit for filing of Complaint for a further period of 3 (three) months if it is satisfied that circumstances existed which prevented the victim from filing the Complaint with the prescribed time period.

6.2.1.1 To the email ID:

- Guj.posh@sarvagram.com
- Mh.posh@sarvagram.com
- Kar.posh@sarvagram.com
- Tel.posh@sarvagram.com
- Raj.posh@sarvagram.com

6.2.1.2 Supervisor or human resources manager;

6.2.1.3 Presiding Officer; or

6.2.1.4 To any member of the Internal Complaints Committee.

At the time of filing the Complaint, the Complainant shall submit to the Internal Complaints Committee, 6 (six) copies of the Complaint along with supporting documents and names and addresses of witnesses.

If the initial Complaint is made to a person other than a member of the Internal Complaints Committee, upon receiving such a Complaint, it will be the responsibility of the complaint receiver to report the same to the Internal Complaints Committee immediately.

- 6.2.2 If the Complainant is unable to make the Complaint in writing, the Presiding Officer or any member of the Internal Complaints Committee shall render all reasonable assistance to the Complainant for making the Complaint in writing.
- 6.2.3 Where the Complainant is unable to lodge a Complaint on account of his/ her physical incapacity, a Complaint may be filed by:
- a) His/ her relative or friend; or
 - b) His/ 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, with the written consent of the Complainant.
- 6.2.4 Where the Complainant is unable to make a Complaint on account of his/ her mental capacity, a Complaint may be filed by:
- a) His/ 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 he/ she is receiving treatment or care; or
 - e) Any person who has knowledge of the incident jointly with the Complainant's relative or friend or a special educator or qualified psychiatrist or psychologist, or guardian or authority under whose care he/ she is receiving treatment or care.
- 6.2.5 Where the Complainant 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 his/

her written consent.

- 6.2.6 Where the Complainant is deceased, a Complaint may be filed by any person who has knowledge of the incident, with the written consent of his/ her legal heir.
- 6.2.7 The Internal Complaints Committee will also investigate Complaints arising out of activities in social media, e.g., Facebook, Twitter, etc.
- 6.2.8 Where the Complainant is not a full time employee of the company, the Complainant may also need to report the issue to their employer, and any investigation will be collaboratively conducted between the company and such employer.

6.3 Conciliation and Investigation Process

- 6.3.1 On receipt of a Complaint, the Internal Complaints Committee shall send a copy of the Complaint to the Accused within a period of 7 (seven) working days. The Accused shall thereafter file his reply to the Complaint along with his list of documents, and names and addresses of witnesses, within a period of 10 (ten) working days from the date of receipt of the documents.
- 6.3.2 Upon receipt of a Complaint, before initiating the inquiry, the Internal Complaints Committee may take steps to settle the matter between the Complainant and the Accused through conciliation. This will be done only if so requested by the Complainant.
- 6.3.3 No monetary settlement can be made as a basis of conciliation.
- 6.3.4 In the event that a settlement is arrived at basis the conciliation, the Internal Complaints Committee shall record and report the same to the Company for taking appropriate action. Resolution through conciliation is to happen with 2 (two) weeks of receipt of Complaint.
- 6.3.5 The Internal Complaints Committee shall provide copies of the settlement to the Complainant and the Accused. Where a settlement has been arrived at, no further inquiry will be conducted by the Internal Complaints Committee.
- 6.3.6 Where the Complainant does not request conciliation of the matter **or** when the settlement is not arrived at **or** the Complainant informs the Internal Complaints Committee that any term or condition of the settlement arrived at through conciliation has not been complied with by the Accused:
 - 6.3.6.1 The Internal Complaints Committee shall proceed to make an inquiry into the Complaint. All proceedings of the inquiry shall be documented.
 - 6.3.6.2 Where both the Complainant and the Accused are Employees, both shall be

given an opportunity to present their case in accordance with the principal of natural justice and a copy of the findings shall be made available to both the parties enabling them to make representation against the findings before the Internal Complaints Committee.

6.3.6.3 If the Complainant or the Accused wishes to cross examine any witnesses, the Internal Complaints Committee will facilitate the same and record the statements.

6.3.6.4 In the event that the Complainant or the Accused seeks to ask questions to the other party, they may give them to the Internal Complaints Committee which asks them and records the statement of the other party.

6.3.6.5 The inquiry report, on completion of the inquiry, shall be provided to the Company, with copies to the Complainant and Accused.

6.3.6.6 The Internal Complaints Committee shall have the right to terminate the inquiry proceedings or give an ex-parte decision on the Complaint, if the Complainant or Accused fails, without sufficient cause, to present himself or herself for 3 (three) consecutive hearings.

6.3.6.7 No legal practitioner can represent any party at any stage of the inquiry procedure.

6.3.6.8 The inquiry shall be completed within a period of 90 (ninety) days.

6.3.6.9 Where the allegation of Sexual Harassment has not been proved as per the inquiry report, the ICC shall recommend to the Company that no action is required to be taken in the matter. The ICC shall ensure that both parties understand that the matter has been fully investigated and is now concluded, and neither will be disadvantaged within the Company.

6.3.6.10 Where the allegation of sexual harassment has been proved as per the inquiry report, the Internal Complaints Committee shall recommend that the Company:

a) Take action against the Accused for sexual harassment as misconduct in accordance with the applicable service rules and policies and this may include:

- Formal Apology to be tendered by the Accused;
- Counselling;
- Written warning;
- Community service;
- Censure or reprimand;

- Withholding promotion and/ or increments;
- Change of work assignment or transfer of the Accused;
- Suspension;
- Termination;
- Any other action that the Company may deem fit.

6.3.6.11 The Company is required to act upon the recommendations within 60 (sixty) days and confirm to the Internal Complaints Committee. Post implementation of the actions, follow up with the Complainant should also occur to ascertain whether the behavior has in fact stopped, the solution is working satisfactorily and if no victimization of either party is occurring.

6.4 Interim Relief Measures

6.4.1 During the pendency of the inquiry, the ICC may, at the written request of the Complainant, make interim recommendations to the Company towards ensuring well-being of the Complainant, safe work space for the Complainant and that no act of retaliation takes place by:

- a) transferring the Complainant or the Accused to any other Workplace of the Company; or
- b) granting leave to the Complainant up to a period of 3 (three) months; or
- c) grant such other relief to the Complainant as may be prescribed under applicable law; or
- d) any other relief that the ICC deems fit to ensure that the Complainant is no longer subject to the behavior complained of.

6.5 Powers of the Internal Complaints Committee

6.5.1 The powers and duties of the ICC shall be as follows, namely:

6.5.1.1 To process Complaints of Sexual Harassment and to take suitable action in the manner and mode particularly provided hereafter.

6.5.1.2 To do all such acts and things as may be necessary to carry out the objects of the Policy and comply with provisions of the POSH Act.

6.5.2 The Internal Complaints Committee shall have the powers of a civil court, which include the following:

6.5.2.1 summoning and enforcing the attendance of any person and examining him/her on oath;

6.5.2.2 requiring the discovery and production of documents; and

6.5.2.3 any other matter which may be prescribed by law.

6.6 Appeal Process

Any party (Complainant or Accused) not satisfied or further aggrieved by the implementation or non-implementation of recommendations made, may appeal to the Appellate Authority within 90 (ninety) days of the recommendations being communicated.

6.7 No Retaliation

6.7.1 There shall be no retaliation against a Complainant or any other participant in the redressal process. Should any participant in the redressal process face any retaliation, such person is requested to bring it immediately to the notice of the Internal Complaints Committee so that appropriate action can be taken.

6.7.2 Examples of retaliation include:

6.7.2.1 Not including the person in meetings or discussions relevant to their work, due to their participation in the redressal process; marginalizing the person;

6.7.2.2 Overworking the person because of their participation in the redressal process;

6.7.2.3 Intimidating the person physically, psychologically, emotionally or someone close to or related to the Complainant;

6.7.2.4 Making comments about the person involving the redressal process. For example: “*don’t speak to him/her, he/she will file a POSH complaint against you*”;

6.7.2.5 Denying opportunities to such person, including that of promotion and/ or giving false remarks regarding the poor performance of a person because of the reason of their participation in the redressal process;

6.8 False complaint or evidence

6.8.1 Where the Internal Complaints Committee, after an inquiry, establishes that:

6.8.1.1 The Complaint against the Accused is false or malicious or is based on false evidence or the Complainant has produced a forged or misleading document or the Complainant has made the Complaint knowing it to be false; or

6.8.1.2 Any witness has given false evidence or has produced a forged or misleading document during the inquiry;

it may recommend to the Company to take action against the Complainant or witness (as the case may be). The action recommended should be similar to the ones proposed for the Accused in case of substantiated Complaints under Clause 5.3.6.10 hereinabove.

6.8.2 A mere inability to substantiate a Complaint or provide adequate proof need not attract action against the Complainant.

6.9 Any Employee of the Company who violates this Policy will suffer appropriate disciplinary action as per the findings of the investigation. If the investigation reveals that the Sexual Harassment has indeed occurred, the Accused shall be suitably disciplined.

6.10 Conversely, anyone making a false or frivolous claim of Sexual Harassment shall also be subject to disciplinary action in accordance with the provisions of the POSH Act.

7. Informal Resolution:

7.1 If the matter is not serious enough to require a formal resolution; it may be brought to an informal resolution.

7.2 The decision of the extent of seriousness is subjective and will be taken through a joint consensus of the ICC members and the Complainant.

7.3 Informal resolution of Complaints is aimed at stopping the discriminatory act(s) in a mutually agreed manner. It is more educational than legal in intent, for both the Accused and the Complainant.

7.4 The Accused may agree to actions such as apologies, reprimands or voluntary resignations, without going through the formal disciplinary procedures.

7.5 In case the Complainant and the accused have arrived at a resolution, the ICC members shall prepare the report of such informal resolution.

7.6 The report shall be signed by the Chairperson of ICC and External Member of ICC, the Complainant and the Accused.

7.7 The report shall be submitted to the Board in the next meeting of the Board convened post such settlement.

8. Duties of the Company

The Company shall:

- a) provide a safe working environment at the Workplace which shall include safety from the persons coming into contact at the Workplace;
- b) display at any conspicuous place in the Workplace, the penal consequences of Sexual Harassment;
- c) organize workshops and awareness programmes at regular intervals for sensitizing the Employees with the provisions of the POSH Act and orientation programmes for the members of the ICC;
- d) provide necessary facilities to the ICC for dealing with the Complaint and conducting an inquiry;
- e) assist in securing the attendance of the Accused and witnesses before the ICC;
- f) Make available such information to the ICC as it may require having regard to the Complaint;
- g) Provide assistance to the Complainant if he/ she chooses to file a Complaint against the Accused in relation to the offence under the Indian Penal Code (45 of 1860) or any other law for the time being in force;
- h) Cause to initiate action, under the Indian Penal Code (45 of 1860) or any other law for the time being in force, against the perpetrator, or if the Complainant so desires, where the perpetrator is not an Employee, in the Workplace at which the incident of Sexual Harassment took place;
- i) Treat Sexual Harassment as a misconduct under the services rules of the Company and initiate action for such misconduct;
- j) Monitor the timely submission of reports by the ICC.

9. Confidentiality

The identity and addresses of the Complainant, Accused, witnesses, any information related to statements and other evidence obtained in the course of inquiry process, recommendations of the ICC, action taken by the Company is considered as confidential materials, and shall not be published, communicated or made known to public, press or media.

Any person contravening the confidentiality clause is subject to disciplinary action as prescribed in the POSH Act.

10. Awareness

- 10.1 All the Employees, agents, customers, vendors, partners, and visitors shall have access to this Policy at any given point of time and clarification related to this Policy shall be addressed by the human resources department of the Company.

- 10.2 A brief shall be given to all existing Employees regarding the features of this Policy immediately on formulation of the Policy and to new employees during their initial induction.
- 10.3 The Company shall carry out orientation programmes and seminars for the members of the ICC.
- 10.4 The Company shall conduct capacity building and skill building programmes for the members of the ICC.
- 10.5 The Company shall use modules developed by the State Government to conduct workshops and awareness programmes for sensitizing the Employees with the provisions of the POSH Act.
- 10.6 The Company shall display the notice showing the names of the ICC members at its every establishment at a conspicuous place.

11. Miscellaneous

- 11.1 The Company may make any alteration/ amendment or rescind any of the clauses of this Policy as and when it finds it necessary to do so as long as it complies with the POSH Act. Any such alterations or amendment or rescinding will be intimated to the Employees.
- 11.2 Wherever possible, the Company shall ensure that all Complaints are dealt with speedily and discreetly.
- 11.3 Nothing contained in this Policy shall operate in derogation of any law for the time being in force or to the prejudice of any right of any Employee under any other rules or law.
- 11.4 The ICC shall, in each calendar year, prepare an annual report with the following details and shall submit the same to the Company: (a) number of complaints of sexual harassment received during the year; (b) number of complaints disposed off during the year; (c) number of cases pending for more than 90 (ninety) days; (d) number of workshops or awareness programs against sexual harassment carried out; and (e) nature of action taken by the Company.

12. Conclusion

Complaints relating to Sexual Harassment shall be handled and investigations will be conducted under the principles of natural justice, basis of fundamental fairness, in an impartial and confidential manner so as to protect the identity of all viz., the Complainant, potential witnesses, and the Accused. Also, all efforts shall be taken to ensure objectivity and thoroughness throughout the process of investigation. The identities and addresses of the Complainant, Accused and witnesses must not be published or disclosed to the public or media. The decision of Company shall be final and binding on all. However, the same is without prejudice to any recourse that the Company or the individual

concerned may have against the Accused and it shall not limit or restrict the rights of the Complainant and/or Company to pursue, nor shall they be precluded from pursuing, such further and other legal actions as may be available.

ANNEXURE 1

Pursuant to the provisions of the POSH Act, an Internal Complaints Committee has been constituted to prevent sexual harassment and to receive and effectively deal with complaints pertaining to the same. Below is the list of members of the Internal Complaints Committee constituted by the Company for each location/ state, where the Company has its presence:

Sr. No.	Name	Designation/ Position	Email address
1.	Ms. Anjali Mahajan	Presiding Officer	anjali@sarvagaram.com
2.	Mr. Pramod Shah	Member	pramod.shah@sarvagaram.com
3.	Mr. Ankit Agarwal	Member	ankit.agarwal@sarvagaram.com
4.	Dr. Svetlana Tatuskar	External Member	tatuskarsvetlana@gmail.com

Each location/ state, where the Company has its presence has a duly constituted Internal Complaints Committee, details of which can be obtained by a written request to any of the above members.