

Prepared by	Virginia Dsouza
Checked by	Shital Salunkhe
Approved by	Nehal Mehta 

POLICY ON PREVENTION OF SEXUAL HARASSMENT AT WORKPLACE

**ANJ TURNKEY PROJECTS PRIVATE
LIMITED**

2025-26

TABLE OF CONTENTS

Sr. No.	Description	Page Nos.
1.	Policy Statement	3
2.	Applicability & Scope	3
3.	Definitions	3
4.	Definition of Sexual Harassment	4
5.	Responsibilities regarding Sexual Harassment	5
6.	Complaint Mechanism	5
7.	Internal Complaints Committee	5
8.	Redressal Mechanism	5
9.	Confidentiality	8
10.	Access to reports and documents	8
11.	Protection to Complainant/ victim	8
12.	Policy Implementation and Review	9
13.	ANNEXURE A	10

I. POLICY STATEMENT

ANJ Turnkey Projects Private Limited (“**Company**”, “**We**”) is committed to providing work environment that ensures every employee is treated with dignity and respect and afforded equitable treatment. The Company is also committed to promoting a work environment that is conducive to the professional growth of its employees and encourages equality of opportunity.

We are dedicated to ensuring that the work environment at all locations is conducive to fair, safe and harmonious relations based on mutual trust and respect, between all employees of the Company. We also strive to guarantee a safe and welcoming environment to all those who visit any of our locations, in any capacity, such as customers, vendors etc.

The Company aims to provide a safe working environment and prohibits any form of sexual harassment. Hence, any act of sexual harassment or related retaliation against or by any employee is unacceptable. This Policy of the Company on Prevention of Sexual Harassment at Workplace (“**Policy**”) intends to prohibit such occurrences and also details the procedure which is to be followed when an employee believes that a violation of the Policy has occurred within the ambit of all applicable regulations regarding sexual harassment. Making a false complaint of sexual harassment or providing false information regarding a complaint will also be treated as a violation of the Policy. Any such violation of the Policy shall attract strict disciplinary action including termination as stated under Section VIII of this Policy.

The Company will not tolerate any form of sexual harassment and is committed to take all necessary steps to ensure that its employees are not subjected to any form of harassment.

II. APPLICABILITY & SCOPE

This Policy applies to all categories of employees of the Company, including permanent management and workmen, temporaries, trainees and employees on contractual basis at their workplace or at client sites. The Policy extends to those who are not employees of the Company such as customers, visitors etc. who are subjected to Sexual Harassment at the Workplace (defined hereinafter) of the Company.

The Company will not tolerate sexual harassment, if engaged in by clients or by suppliers on the employee.

The scope of the Policy is restricted to the following for all employees:

1. All offices or other premises where the Company’s business is conducted;
2. All company-related activities performed at any other site away from the Company’s premises;
3. Any social, business or other functions where the conduct or comments may have an adverse impact on the workplace or workplace relations.

III. DEFINITIONS

1. Aggrieved Individual

An Aggrieved Individual, in relation to a workplace, is a person, of any age, whether an Employee or not, who alleges to have been subjected to any act of Sexual Harassment.

2. Complainant

A Complainant is any Aggrieved Individual (if the Aggrieved Individual is unable to make a complaint on account of his/ her physical or mental incapacity or death or otherwise) who makes a complaint alleging Sexual Harassment under this Policy.

3. Employee

An Employee means a person employed with the Company for any work on permanent, deputation, temporary consultants, agents, independent auditors, promoters, merchandisers or product consultant(s), engaged on part time, ad hoc or daily wage basis, either directly or through an agent, including a contractor, with or without the knowledge of the principal employer, whether for remuneration or not, or working on a voluntary basis or otherwise, whether the terms of employment are express or implied and includes a co-worker, a contract worker, probationer, trainee, apprentice, or called by any such similar name.

4. Respondent

A Respondent means the person against whom the Complainant has made a complaint.

5. Workplace

- a. Premises, locations, stores, establishments, enterprises, institutions, offices, branches, units established, owned, controlled by the Company;
- b. Places visited by the Employee arising out of or during the course of employment including official event, transportation, and accommodation provided by the employee for undertaking such journey.

IV. DEFINITION OF SEXUAL HARASSMENT

Sexual harassment may be one or a series of incidents involving unsolicited and unwelcome sexual advances, requests for sexual favours, or any other verbal or physical conduct of sexual nature.

“Sexual Harassment” includes any one or more of the following unwelcome acts or behavior (whether directly or by implication):

- i. 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:
 - i. Physical contact and advances;
 - ii. Demand or request for sexual favors;
 - iii. Sexually colored remarks or remarks of a sexual nature about a person's clothing or body;
 - iv. 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.;

- v. Repeatedly asking to socialize during off-duty hours or continued expressions of sexual interest against a person's wishes;
- vi. Giving gifts or leaving objects that are sexually suggestive;
- vii. Eve teasing, innuendos and taunts, physical confinement against one's will or any such act likely to intrude upon one's privacy;
- viii. Persistent watching, following, contacting of a person; and
- ix. Body Shaming;
- x. Any other unwelcome physical, verbal or non-verbal conduct of sexual nature
- xi. any conduct that has the purpose or the effect of interfering with an individual's work performance or creating an intimidating, hostile or offensive work environment and/or submission to such conduct is either an explicit or implicit term or condition of employment and /or submission or rejection of the conduct is used as a basis for making employment decisions;

The following circumstances if it occurs or is present in relation to any sexually determined act or behavior amount to sexual harassment:

- i. Implied or explicit promise of preferential treatment in employment;
- ii. Implied or explicit threat of detrimental treatment in employment;
- iii. Implied or explicit threat about the present or future employment status;
- iv. Interference with the person's work or creating an intimidating or offensive or hostile work environment; or
- v. Humiliating treatment likely to affect health or safety.

"Sexual Harassment" would also mean:

- **Quid pro quo sexual harassment**, which means something in return of an exchange of one thing or an exchange of one thing for another:
 - a) In the workplace, quid pro quo sexual harassment takes place if sexual favours are asked in exchange for any kind of special treatment on the job. Threatening an employee if he/she does not consent to such sexual advances or favours also amount to sexual harassment. The act of 'asking' may either be verbal or implied and the 'sexual conduct' may be verbal or physical. But, in either case, it must be unwelcome.
 - b) Direct or implied requests or offers by an employee for sexual favours in exchange for actual or promised job benefits such as favourable reviews, salary, increased benefits, or continued employment constitutes sexual harassment.
- **Hostile Work environment** includes:
 - a) Hostile environment sexual harassment occurs when either speech or conduct of a sexual nature takes place, and is seen or perceived as offensive and interferes with the work performance of the recipient, or any one or more employees.
 - b) Hostile environment sexual harassment may also include intimidating or harassing conduct that is directed at an individual, or a group of individuals.

- c) It will also mean related retaliation which includes marginalizing someone in the workplace with regards to his/her roles and responsibilities, socially ostracizing, intimidating someone physically, psychologically, and emotionally or someone close to or related to the victim.
- d) This is only an indicative list of the possible acts which could be traced as sexual harassment and is in no way intended to be construed as an exhaustive list. An alleged act of sexual harassment committed during or outside of office hours falls under the purview of this policy. Further, it is important to note that whether harassment has occurred or not does not depend on the intention of the people but on the experience of the aggrieved woman.

V. RESPONSIBILITIES REGARDING SEXUAL HARASSMENT

All employees of the Company have a personal responsibility to ensure that their behaviour is not contrary to this policy. All employees are encouraged to reinforce the maintenance of a work environment free from sexual harassment.

Employee Responsibilities:

- Encourage employees to report incidents promptly.
- Prohibit retaliation against complainants or witnesses.
- Mandate participation in awareness programs.

VI. COMPLAINT MECHANISM

An appropriate complaint mechanism in the form of “Internal Complaints Committee” has been created in the Company for time-bound redressal of the complaint made by the victim.

VII. INTERNAL COMPLAINTS COMMITTEE (ICC):

The Company has instituted an Internal Complaints Committee for redressal of sexual harassment complaint (made by the victim) and for ensuring time bound treatment of such complaints at each location. The details of the Internal Complaints Committee is notified to all covered persons at the respective location.

The committee at each location comprises of:

- Presiding Officer: A woman employed at a senior level in the organization or workplace;
- At least 2 members from amongst employees, committed to the cause of women and or having legal knowledge;
- One external member, familiar with the issues relating to sexual harassment;
- At least one half of the total members is women.

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

The Presiding Officer reserves the right to nominate more members of appropriate seniority and rank in the committee to conduct such enquiries to ensure equal representation of the gender as that of the complainant or for any other valid reason.

The Complaints Committee is responsible for:

- Investigating every formal written complaint of sexual harassment;
- Taking appropriate remedial measures to respond to any substantiated allegations of sexual harassment;
- Discouraging and preventing employment-related sexual harassment.

VIII. REDRESSAL MECHANISM

1. If the aggrieved person has been subjected to sexual harassment, then the aggrieved person should promptly report by email to the Complaints Committee at virginia.dsouza@anj.co.in
2. The complaint should be lodged immediately or within a reasonable period three (3) months from the date of incident/last incident. The Internal Committee can extend the timeline by another 3 months for reasons recorded in writing, if satisfied that these reasons prevented the lodging of the complaint within the period.
3. If the aggrieved woman is unable to lodge the complaint in account of her physical incapacity, the following may do so on her behalf, with her written consent:
 - i. Legal heir, relative or friend; or
 - ii. Co-worker; or
 - iii. Any person having the knowledge of the incident.
4. If the Aggrieved Woman is unable to make a complaint on account of her mental incapacity, a complaint may be filed by:
 - i. her relative or friend; or
 - ii. a special educator; or
 - iii. a qualified psychiatrist or psychologist; or
 - iv. the guardian or authority under whose care she is receiving treatment or care; or
 - v. any person who has knowledge of the incident jointly with the Aggrieved Woman's relative; or
 - vi. friend or a special educator or qualified psychiatrist or psychologist, or guardian or authority;
 - vii. under whose care she is receiving treatment or care.
5. If the initial complaint is made to a person other than a committee member, upon receiving such a complaint, it will be the responsibility of the complaint receiver to report the same to the committee immediately.
6. All complaints / grievances of sexual harassment will be taken seriously, will be held in strict confidence and will be investigated promptly in an impartial manner.
7. The Complaint Committee will thoroughly investigate the complaint/ grievance and will take the necessary appropriate course of action.
8. Any victimization of, or retaliation against, the complainant or any employee who gives evidence regarding sexual harassment will be subject to disciplinary action up to and including termination of employment.
9. In case, the complaint lodged is found to be false, malicious or forged and misleading documents have been produced, the Complaints Committee post investigations may recommend disciplinary action against the complainant.
10. Disciplinary Action: In case any such conduct amounts to a specific offence under the Indian

Penal Code or under any other law, the Company shall initiate appropriate action in accordance with the law by lodging a complaint with the appropriate authority. Sexual harassment will not be tolerated by the Company. If the outcome of an investigation by the Complaints Committee shows that harassing behaviour has taken place, the harasser/respondent will be subject to disciplinary action up to and including termination of employment.

11. Resolution Mechanism

i. Resolution procedure through conciliation

- a. Upon receipt of the complaint, and prior to initiating a formal inquiry, ICC may facilitate conciliation between the complainant and the respondent, but only at the request of the aggrieved woman. It is expressly clarified to all parties that opting for conciliation does not amount to an admission of the complaint by the respondent. Conciliation is intended as a practical approach to resolve the matter or clarify any misunderstandings. If a settlement is reached, the ICC shall document the terms and submit a report to the employer for appropriate action. The process of conciliation must be completed within two weeks of receiving the complaint. Copies of the settlement are provided to both the complainant and the respondent. Once the agreed action is implemented, no further inquiry is conducted.

ii. Resolution procedure through formal inquiry

a. Conducting Inquiry

- The committee initiates inquiry in the following cases:
- No conciliation is requested by aggrieved woman
- Conciliation has not resulted in any settlement
- Complainant informs the committee that any term or condition of the settlement arrived through conciliation, has not been complied with by respondent

- b. **Interim Relief**-During pendency of the inquiry, on a written request made by the complainant, the ICC may recommend to the employer to

- Transfer the complainant or the respondent to any other workplace
- Grant leave to the aggrieved woman of maximum 1 month, in addition to the leave she would be otherwise entitled;
- Prevent the respondent from assessing complainant's work performance
- Grant such other relief as may be appropriate

Once the recommendations of interim relief are implemented, the employer will inform the committee regarding the same.

c. Termination of Inquiry

Committee may terminate the inquiry or give ex-parte decision, if complainant or respondent respectively is absent for 3 consecutive hearings, without sufficient reason. 15 day written notice is to be given to the party, before termination of enquiry or ex-parte order.

d. Complaint unsubstantiated

Where the committee arrives at the conclusion that the allegation against the respondent

has not been proved, it recommends to the employer that no action is required to be taken in this matter. Further, the committee ensures that both parties understand that the matter has been fully investigated, that the matter is now concluded, and neither will be disadvantaged within the Company.

e. **Complaint substantiated**

Where the committee arrives at the conclusion that the allegation against the Respondent has been proved, it recommends to the employer to take necessary action for sexual harassment as misconduct, in accordance with the applicable service rules and policies, and this may include:

- i. Counseling
- ii. Censure or reprimand
- iii. Formal apology to be tendered by respondent
- iv. Written warning to the perpetrator and a copy of it maintained in the employee's file.
- v. Change of work assignment / transfer for either the perpetrator or the victim.
- vi. Withholding promotion and/or increments
- vii. Suspension or termination of services of the employee found guilty of the offence
- viii. Or any other action that the ICC may deem fit.

f. **Penal Consequences of Sexual Harassment**

In case the Committee finds the degree of offence coverable under the Indian Penal Code, then this fact shall be mentioned in its report and appropriate action shall be initiated by the employer, for making a Police Complaint. Under the Indian Penal Code, (IPC), the newly introduced Section (S. 354A) which deals with Sexual Harassment has made this a 'cognizable offense' i.e. a person charged with Sexual Harassment may be arrested without a warrant.

g. **Malicious Allegation**

In case the complaint is found to be false, the Complainant shall, if deemed fit, be liable for appropriate disciplinary action by the Company.

IX. CONFIDENTIALITY

The Company understands that it is difficult for the victim to come forward with a complaint of sexual harassment and recognizes the victim's interest in keeping the matter confidential. To protect the interests of the victim, the accused person and others who may report incidents of sexual harassment, confidentiality will be maintained throughout the investigatory process to the extent practicable and appropriate under the circumstances.

X. ACCESS TO REPORTS AND DOCUMENTS

All records of complaints, including contents of meetings, results of investigations and other relevant material will be kept confidential by the Company except where disclosure is required under disciplinary or other remedial processes.

XI. PROTECTION TO COMPLAINANT / VICTIM

The Company is committed to ensuring that no employee who brings forward a harassment concern is subject to any form of reprisal. Any reprisal will be subject to disciplinary action. The Company will ensure that the victim 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 disciplinary action.

XII. POLICY IMPLEMENTATION AND REVIEW

The Company commits to a sexual harassment free working atmosphere. The Company shall implement the Policy and play a facilitating role in redressal of complaints of sexual harassment. The Company reserves the right to amend, abrogate, modify, rescind/reinstate the entire policy or any part of it at any time.

XIII. AWARENESS

Awareness sessions are to be organized to:

- Formulate and widely disseminate an internal policy or charter or resolution or declaration for prohibition, prevention and redressal of sexual harassment at the workplace intended to promote gender sensitive safe spaces and remove underlying factors that contribute towards a hostile work environment against women.
- Carry out orientation programs and seminars for the Members of the IC.
- Conduct capacity building and skill building programs for the Members of the IC.
- Declare the names and contact details of all the Members of the IC.
- Use modules developed by the State Governments to conduct workshops and awareness programs for sensitizing the employees with the provisions of the Act.

XIV. 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 POSH Act and rules, within 90 days of the recommendations being communicated.

XV. LEGAL COMPLIANCE

The ICC shall in each calendar year prepare, in such format as may be prescribed, an annual report and submit the same to the employer and the District Officer (as defined in the Act). The report shall have the following details:

- number of complaints of Sexual harassment received in the year;
- number of complaints disposed of during the year;
- number of cases pending for more than 90 days;
- number of workshops or awareness program against Sexual Harassment carried out;
- nature of action taken by the employer or District Officer.

ANNEXURE A

Sr. No	Name	Status	Email ID
1	Virginia Dsouza	Presiding Officer	virginia.dsouza@anj.co.in
2	Tejashri Jadhav	Member	tejashri@anj.co.in
3	Viral Joshi	Member	viral.joshi@anj.co.in
4	Shital Salunkhe	Member	shital.salunkhe@anj.co.in
5	Chetan Sampat	Member	chetansampat@anj.co.in
6	Priyanka Sinha	External member	psinha@anppartners.in