



SIGACHI INDUSTRIES LIMITED

CIN: L24110TG1989PLC009497

AN EXCiPACT GMP, ISO 9001:2015 & FSSC 22000 CERTIFIED COMPANY

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Document Version Control Note	
Name of Document	Prevention of Sexual harassment at Workplace Policy
Policy number	HR / Corp / Prevention of Sexual harassment at Workplace Policy / 013
Release Date Original Version	1 st June 2023

Revision History

Version	Release Date	Reviewed Date	Change incorporated
1.0	1 st June 2023	31 st Dec 2023	-
2.0	1 st Jan 2024	31 st Dec 2024	-



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Prevention of Sexual Harassment at Workplace

Objective:

Sigachi is committed to providing a workplace where everyone is treated with dignity and respect, in an environment free of all forms of unlawful discrimination, including but not limited to sexual harassment and any other types of discriminatory harassment.

Scope:

The policy extends to all the employees, interns, visitors, and vendor partners of all genders at Sigachi, to the extent that sexual harassment at workplace is strictly prohibited. No one should be subjected to sexual harassment at workplace.

The policy extends the right to complain, in relation to Sigachi workplace, whether employed or not. This includes:

- Employees of all genders of the company
- Contractual staff
- Visitors

Applicability:

This policy covers and is applicable to all locations of Sigachi, including any place visited by the employee arising out of or during employment including transportation provided by the employer for undertaking such a journey.

Any other employee of the Company who is not covered under the scope of the policy can also take benefits of this policy by making a complaint to the Internal Committee (IC) or Human Resources Department of the Company as the case may be.

Prevention of Sexual Harassment:

This policy is aimed at preventing any form of sexual harassment and to provide such an environment to Company employees that, no employee shall be subjected to sexual harassment at the workplace which may include (as the case may be), but is not limited to –

- ✓ physical contact and advances; or
- ✓ a demand or request for sexual favours; or
- ✓ making sexually coloured remarks; or
- ✓ showing pornography; or
- ✓ any other unwelcome physical, verbal, or non-verbal conduct of a sexual nature.

Also, the following circumstances, among other circumstances, if it occurs or is present in relation to or connected with any act or behaviour of sexual harassment may amount to sexual harassment.



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- ✓ implied or explicit promise of preferential treatment in an employee's employment; or
- ✓ implied or explicit threat of detrimental treatment in an employee's employment; or
- ✓ implied or explicit threat about present or future employment status of the employee; or
- ✓ interference with an employee's work or creating an intimidating or offensive or hostile work environment; or
- ✓ humiliating treatment likely to affect the employee's health or safety.

Definitions:

Unless repugnant or contrary to the context, following words/phrases as mentioned in this policy shall have the meaning as described hereunder:

- ✓ Act - means the Sexual Harassment of Women at Workplace Prevention, Prohibition and Redressal) Act, 2013 and rules made there under. This includes any amendments made to the Act & Rules.
- ✓ Complaint - shall have the meaning as defined in the Act. The Complaint can be verbal or in writing. When made verbally, the complaint shall be reduced/converted in writing and signed by the Complainant.
- ✓ Complainant - In relation to Sigachi workplace, complainant can be any woman employed or not, who alleges to have been subjected to any act of sexual harassment by the respondent. Complainant can also be a male employee (including contractual staff as the case may be) or any other employee of the Company. Complainant also includes any person who is entitled or authorized to make representations/complaints on behalf of the aggrieved employee.
- ✓ Company or Organization - means Sigachi Industries Ltd.
- ✓ Defendant or respondent- means the person against whom the Complaint of sexual harassment has been made.
- ✓ Employee - shall have the meaning as defined in the Act. It includes a female, male or any other employee of the company.
- ✓ Employer - means Managing Director & Chief Executive Officer – Sigachi Industries Ltd.
- ✓ Human Resource (HR) - means authorized representatives of Human resource department of Sigachi Industries Ltd
- ✓ The Internal Committee (IC) shall have the meaning as defined in the Act.

Internal Committee (IC)

It will primarily consist of:

1. A Presiding Officer – who shall be a woman employed at a senior level at the relevant Company location from amongst the employees.
2. Not less than two members from amongst employees preferably committed to cause of women, women empowerment activities, or who have experience in social work or have legal knowledge.
3. One member from the Human Resources Department of the Company representing the Line of Business or the relevant enabling department of the Company.



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4. Any other person appointed by employer.
5. One member from NGO or association committed to the cause of women or a person familiar with the issues relating to sexual harassment.

Internal Committee (IC)

Member	Designated person name
Senior Presiding Officer	Ms. Swati Sinha
Deputy Presiding Officer	Ms. Annapurna Carchalla
Member	Ms. Saumya Dubey
Member	Mr. Subramanian Ananthanarayanan
Member	Dr. Rohit Raj
External Member (NGO or another person)	Ms. Chitra Sadhoo

Senior Presiding Officer (SPO):

The Company shall appoint a female member from its leadership team to be the Senior Presiding Officer. The SPO shall be the Chairperson of all IC members of the Company. All recommendations to the employer by IC shall require SPO approval. Presiding officers shall report to the SPO.

Provided that at least one-half of the total members (as mentioned above) so nominated shall be women.

Service Rules:

Means the conditions and provisions as are mentioned in employee handbook, code of conduct, employment terms (agreements), any other executed documents, and procedures and policies of the human resources department of the Company.

Sexual Harassment

Includes "such unwelcome sexually determined behavior (whether directly or by implication) as physical contact and advances; a demand or request for sexual favours; sexually coloured remarks; showing pornography; and any other unwelcome physical, verbal or non-verbal conduct of a sexual nature.

Sexual Harassment for the purpose of this policy also includes:



SIGACHI INDUSTRIES LIMITED

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1. Any act or conduct by a person in authority towards a subordinate/reportee, which denies or would deny equal opportunity in pursuit of career development, or otherwise any other form of discrimination with the intention of obtaining sexual favors from such subordinate/reportee, or
2. Forcible physical touch or acts conducive of molestation against one's will and any other act to impinge upon one's privacy by acts conducive of sexual advances, or
3. Any other unwelcome sexual advances, requests for sexual favors, and/or verbal or physical conduct of a sexual nature, obscene acts of songs, words, or gestures to insult modesty of another person, or
4. Sexually colored remarks, including but not limited to loaded comments, lewd jokes, through e-mail or any other communication mediums (verbal or non-verbal), display (including SMS/MMS), showing pornography.

Workplace:

Shall have the meaning as defined in the Act. Apart from the Company premises workplace may also include:

- i. Any place visited by the employee arising out of or during the course of their employment including client locations, service provider locations, vendor locations etc.
- ii. Any place of employment including transportation provided by the employer for undertaking such journey.
- iii. Offsites, out of office training sessions, Annual Parties, Townhall that are done outside of the office premises for official reasons.

Misconduct:

To the extent the IC recommends that the allegations of sexual harassment are made out against the respondent. Same will be treated as misconduct and appropriate and relevant disciplinary actions against the act will be taken by the Company as per its policies and procedures in addition to any recommendations being made out by the IC.

Complaint of Sexual Harassment:

A complainant can file a complaint with the IC or Human Resources Department (HR). If the Complaint is filed with HR, the same will be returned by HR to IC within 7 business days of its receipt with their initial investigations, if any. HR may refer the complaint directly to IC without investigation as well, if it deems that prima facie a case is made out. HR shall maintain confidentiality and shall not override any provisions of this policy. The Initial investigation from HR should be limited to the extent of getting a detailed written complaint, along with the details of all witnesses and evidence. HR shall not try to form an opinion on the matter nor should it try to influence the IC with such opinions.

All complaints shall be in writing and signed by the Complainant. A verbal complaint shall be converted to writing by IC/HR on receipt and acknowledged by the Complainant. An anonymous complaint will be acknowledged by the company. It will be evaluated and verified on its merits and if it qualifies for an action by IC (as per evaluation by HR). It will be provided for further action to IC in terms of this policy.



SIGACHI INDUSTRIES LIMITED

CIN: L24110TG1989PLC009497

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The Complainant should file the complaint in compliance with the requirements of the Act. This includes:

- i. Filing the complaint within 3 months of the alleged incident or in case of series of incidents within 3 months of the last alleged incident, which period may be extended by IC in writing for maximum 3 more months for reasons recorded in writing, if the IC feels that the Complainant was prevented from filing the complaint during the said 3 months (initial) period.
- ii. The Complaint can be filed by legal heirs or any other representative (not being a lawyer) on the Complainant's behalf as provided in section 9 of the Act & notified Rules. In such scenario, they shall have such rights (as may apply) as are provided by the Act to the Complainant (excluding any rights to seek employment with the Company)

Complainant's rights and duties:

The Complainant shall have all relevant and applicable rights as are provided to a Complainant in the Act. This includes:

- ✓ Right to fair trial
- ✓ Right to appeal IC's decision
- ✓ Right to bring evidence, witnesses, and materials in support of respondent's defense
- ✓ Seeking interim transfer or removal from the current process to avoid confrontation with the defendant.
- ✓ Seeking conciliation or mediation instead of pursuing the complaint at any time during the inquiry or before the inquiry.
- ✓ Seeking prevention from disclosure of identity, except where needed for the purpose of inquiry.
- ✓ Seeking cross examination of respondent's witnesses and verifying any materials provided by respondent.

It shall be the duty of the complainant to reasonably weigh all circumstances before filing the Complaint and avoid filing a complaint in fit of anger, jealousy, or any misconstrued notions. The Complainant shall be required to comply with the instructions of IC during the inquiry and be available as needed for the furtherance of the inquiry. To the extent as is reasonably possible the Complainant should provide all materials and evidence that the IC can review and evaluate to make a recommendation in the Complainant's case.

Relief(s) to Complainant during pendency of inquiry:

The Complainant shall have all relevant and applicable reliefs as are provided to a Complainant in the Act during the pendency of inquiry. IC shall verify and weigh what reliefs are to be provided to the Complainant during the pendency of inquiry.

Respondent's rights and duties:



SIGACHI INDUSTRIES LIMITED

CIN: L24110TG1989PLC009497

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The Respondent shall have all relevant and applicable rights as are provided to a Respondent in the Act. This includes:

- ✓ Right to a fair trial
- ✓ Right to bring evidence, witnesses, and materials in support of respondent's defense.
- ✓ Right to seek interim transfer or removal from process during the pendency of inquiry.
- ✓ Right to question or cross examine evidence, witnesses and materials adduced/provided by the Complainant.
- ✓ Right to appeal IC's decision.

The duties of the Respondent include to cooperate with IC during the enquiry into the Complaint; to file replies in a timely manner and appearing in front of the IC as and when required; In case a settlement is reached it shall be the duty of the Respondent to ensure that none of the terms of settlement are breached.

Internal Committee duties & responsibilities:

IC shall perform all actions in conformance with the requirement of the Act. The IC will hold all inquiries in the manner as laid down in the Act and as per this policy. The Preliminary members of the IC and SPO shall hold office for a period not more than 3 years. The member appointed from NGO or other association shall be paid such fees or allowances for holding the proceedings of the Internal Committee, by the Company as may be prescribed. The preliminary members of the IC and the SPO must vacate office under such circumstances as explained in the Act including Sec. 4 (5) of the Act. If a member contravenes the provisions of section 16 of the Act after completion of an inquiry, he or she shall be removed from the IC, but this might not be grounds for review of the decision.

Responsibilities of Internal Committee:

- ✓ The IC shall comply with all the requirements as are provided in the Act for its function and perform responsibilities that are required to be performed for a fair inquiry.
- ✓ On receipt of a compliant, the IC shall ensure that it is acknowledged in writing by Complainant or reduced/converted to writing.
- ✓ Offer opportunity of reconciliation or mediation to Complainant.
- ✓ The IC will complete the inquiry and provide recommendations to the Employer in as reasonable time as possible but within 90 days of receipt of complaint. In case of any delays, same will be recorded in the proceedings of the inquiry. The IC will ensure that the proceedings during the inquiry are appropriately recorded. The IC will use the formats as attached with this policy to record its proceeding, orders, witness statement etc.
- ✓ The IC shall ensure a fair inquiry based on the principles of natural justice
- ✓ Any disqualifications, absenteeism during the inquiry of its members, shall be duly recorded by the IC.



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- ✓ The SPO shall ensure that the records of the IC are kept in manner to be provided as evidence in legal proceedings or in annual audits. To this effect the SPO may designate a person from preliminary members of IC to be the record keeper.
- ✓ Conduct inquiry as per the Service Rules of the Company or in their absence, as per the rules framed under the Act.
- ✓ The IC shall provide a copy of the Act, Rules and Company Policy to both the Complainant and Respondent during the inquiry.
- ✓ Before making recommendations, provide a copy of its finding to Complainant and Respondent so that they can make their respective representations with respect to the findings.
- ✓ Timely preparation and submission of annual reports to management and District officers.

Recommendations by the Internal Committee:

The IC can make the following recommendations to the employer.

- ✓ That it has concluded in favour of the Complainant.
- ✓ In which case it should recommend to the employer to take action against sexual harassment as a misconduct and the respondent will be liable for action as per the Service Rules of the Company or in their absence as per the provisions of the Act or the rules framed thereunder. The IC may also recommend the deductions to be made from the salary/wages of the respondent as it may feel justified in the case as per the provisions of Section 15 of the Act and paid to Complainant or Complainant's legal heir. Whereby employer is unable to make deductions as recommended by IC from the salary/wages of the respondent, IC may direct the Respondent to make such payments to the Complainant or its legal heirs.
- ✓ That it has not concluded in favor of the Complainant, thereby dismissing the complaint.
- ✓ That IC has to reach a decision – either the allegations are proved or not. In case the allegations for sexual harassment are not proven but IC feels that the complaint shall be forwarded to HR for action under some other service rule / provision then it can recommend that action.
- ✓ Any other recommendation it feels is justified on the merits of the case.
- ✓ Make recommendations against false and malicious complaints.

Employer Actions subsequent to submission of recommendation:

- ✓ Employer will action upon the recommendations within 60 days of receipt of the same from the IC.
- ✓ Employer may seek a clarification on the recommendations from IC before acting on the same.
- ✓ Employer to provide a report of action on recommendation within 60 days of the receipt of recommendation to IC. In case an interim relief is recommended by the IC, the employer shall implement the recommendations and send the report of such implementation to the IC.

Inquiry:



SIGACHI INDUSTRIES LIMITED

CIN: L24110TG1989PLC009497

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The inquiry will be made by the IC as per the terms of the Service rules and where no such provisions exist in the Service Rules as per the Act and rules made thereunder.

- ✓ During the inquiry, the IC shall ensure that all opportunities of being heard are provided to both parties.
- ✓ IC shall provide a copy of its findings to both the parties and employer within 10 days of the conclusion of its inquiry.
- ✓ Neither party can bring in legal practitioners at any stage of the inquiry

Dismissal of Complaints:

- ✓ IC can terminate the inquiry proceedings or give an ex-parte decision on the complaint, if the complainant or the respondent is absent for 3 consecutive hearings convened without sufficient cause. Such termination of inquiry or ex-parte order can be passed only after giving a written notice, fifteen days in advance, to the party concerned.
- ✓ Closure of Complaints: IC after reaching a conclusion, that the allegations against the respondent are proven or not, shall make suitable recommendations to the employer in line with its findings. Once the recommendations are implemented by the employer the IC can close the complaint

Other rights of the Internal Committee:

For the purpose of making an inquiry into a complaint of Sexual Harassment at workplace filed by a woman, the IC shall have the same powers as are vested in a civil court in respect of the following matters, namely:

- ✓ Summoning and enforcing attendance of any person and examining such person on oath.
- ✓ Requiring the discovery and production of documents.

False complaints:

False and malicious complaints are not encouraged. If the IC concludes that a complaint is false and/or malicious it may make recommendations to the employer to take such steps as are available in the Service Rules for misconduct or any other disciplinary action. However, mere inability to substantiate a complaint or provide adequate proof need not attract action against the complainant. Before any action is recommended the malicious intent on part of the complainant shall be established after an inquiry.

Rights & Duties of Employer:

Employer shall have all rights granted to it under the Act or relevant applicable laws including the following:



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- ✓ The employer shall be provided a recommendation by the IC with all supporting documents and evidence to substantiate its findings and conclusions.
- ✓ The employer will also be provided with any representations that the opposite parties had made against such finding.
- ✓ To the extent the inquiry does not conclude the action to be a sexual harassment, the employer reserves the right to take such actions as necessary on other grounds (subject to a fair domestic inquiry)

Employer's duties include:

- ✓ Providing a safe working environment at the workplace which shall include safety from the persons coming into contact at the workplace.
- ✓ Displaying at any conspicuous place in the workplace, the order constituting, the internal committee.
- ✓ Organizing workshops and training programs at regular intervals for sensitizing the employees regarding the provisions of the Act.
- ✓ Providing necessary facility to the Internal Committee or the Local Committee, as the case may be for dealing with the complaint and conducting inquiry.
- ✓ Assisting in securing the attendance of respondent and witnesses before the committee.
- ✓ Making available such information to the committee as may be required.
- ✓ Providing reasonable assistance to the Complainant if she/he chooses to file a complaint in relation to the offence under the Indian Penal Code or any other law for the time being in force
- ✓ Causing to initiate action, under the Indian Penal Code or any other law for the time being in force, against the perpetrator after the conclusion of the inquiry at the request of the Complainant, or where the perpetrator is not an employee in the workplace at which the incident of sexual harassment took place.
- ✓ Treat sexual harassment as a misconduct under the service rules and initiate action for such misconduct.
- ✓ Monitor timely submission of reports by IC.
- ✓ Include details of cases filed and disposed off under the Act in its annual reports.

Obligation to Confidentiality:

During all proceedings under this policy the confidentiality of all parties shall be maintained unless disclosures are required for the purpose of inquiry.

Other Actions

i. Declaration by Contractors & Services Providers:

It is proposed that the employer will seek declarations from its vendor/contractors for compliance with the terms of the Act. Such declarations will be taken from existing vendors as one-time activity (to be completed within a period determined by employer) and thereafter same will become a part of contractual engagements.



SIGACHI INDUSTRIES LIMITED

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ii. **Complaints by Contractual Staff:**

In case a complaint is made by a contractual employee against another contractual employee, who has been hired through the same vendor. IC will hand over the complaint to the employer of the concerned vendor and provide all the reasonable support in terms of providing evidence and witnesses as the case maybe. For any complaints against company employees, IC will proceed as per the terms of this policy.

iii. **Complaints by male employees:**

Complaints by male employees will be handled in the same manner as any other complaint under the policy.

Conciliation and mediation:

- ✓ The IC on receipt of a complaint and on written request of the Complainant will provide the Complainant with an opportunity of settlement of the complaint through mediation or conciliation.
- ✓ The mediation and conciliation action will be done by the Human Resources department of the Company, who will submit its reports to the IC on conclusion or failure of mediation/conciliation.
- ✓ IC will conduct inquiry on failure of mediation or conciliation or where the respondent fails to observe the condition of settlement.
- ✓ Where conciliation is concluded through settlement; the IC will record the Settlement and provide a report to this effect to the employer to act as specified in the recommendation.
- ✓ Once a settlement is reached the employer shall not take any further action against the respondent, unless the employer is informed by the IC that the terms of settlement have been breached by the respondent.
- ✓ A copy of Settlement will also be provided to the opposite parties.

Miscellaneous:

- ✓ Communications: The Company / Employer will be responsible for preparing and sharing communications on the policy and proposed trainings to the employees.
- ✓ Trainings: The Employer or a designee will be responsible for devising the trainings required as per the requirement of the Act. These trainings will be imparted to IC and employees. The trainings will be imparted at least once a year or as may be reasonably practical.
- ✓ Audit: At least an annual audit will be done by the legal department on compliance with the terms of this policy by IC & Employer.
- ✓ Annual Report: IC will submit its report and employer will publish details of cases as per the provisions of this policy and the Act.
- ✓ Record Retention: All records under this policy will be retained for 8 years (except in case of legal hold) and will be destroyed and retained as per the procedure specified in the Company's Record Retention policy.



SIGACHI INDUSTRIES LIMITED

CIN: L24110TG1989PLC009497

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- ✓ During the period, the IC is being constituted, Employer will continue to inquire into allegations of Sexual Harassment as per its Domestic Inquiry procedures. Subject to handing over the material and inquiry details to IC for any inquiries not concluded till the constitution of IC.

Annexure I - Procedure during the Inquiry

The complainant has to file six copies of the complaint along with supporting documents and the name and addresses of witnesses. On receipt of the complaint by IC, one copy shall be sent to the respondent within 7 working days. The respondent shall file his written reply within 10 working days from the date of receipt of documents.

- a. The Internal Committee (IC), or a minimum of 3 members including the Presiding Officer of the full IC, will meet with the Complainant latest within one week of receipt of the complaint. They will inform the Complainant of this meeting date at the earliest. At the first meeting with the IC, the Complainant will be heard, and the Complainant's statements will be recorded. The complainant will be asked to share the details of any witnesses and/or evidence, if the same has not already been done along with the written complaint filed by her / him. IC will record the proceedings of the inquiry, and the attendance of all parties present at any of the meetings.
- b. Thereafter, the person accused of the alleged Sexual Harassment will be called for a meeting with the IC. The IC will issue a notice in this regard to the Respondent within 7 working days. The notice will mention the fact that a complaint has been registered against the Respondent. During the meeting, the complaint will be narrated to the Respondent in detail, and the Respondent will be given the opportunity to provide Respondent's view of the situation. The IC will provide the Respondent with a copy of the statement of allegation made by the Complainant and provide the Respondent with an opportunity to submit a written response, should the Respondent so desire, within 10 days of receipt of the statement. (i.e. Respondent has 10 days to prepare and file his defense/response).
- c. If the Complainant or the Respondent wants to call on witnesses, they must write to the IC with the names and contact details of those witnesses, after which the Chairperson/Presiding officer of the Committee will call the witnesses.
- d. After having heard both parties, the IC will conduct an inquiry into the evidence provided by both parties. The inquiry may include meetings with witnesses, consultation with experts and any other activities required to establish a balanced view of the case.
- e. The IC will provide every reasonable opportunity to the Complainant and to the Respondent to put forward and defend their respective cases.



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- f. The IC will complete the enquiry within ninety (90) days of receipt of the complaint and communicate its findings and its recommendations to the employer within ten (10) days of the completion of the enquiry.)
- g. Should the preliminary inquiry establish that the complaint does not fall under the purview of a IC for the Prevention of Sexual Harassment, or the complaint does not prima facie appear to be an offence of Sexual Harassment, the IC may decide to refer the Complainant to the HR, who can look into the case taking into consideration the principles of good conduct as laid down in the Company's Code of Conduct (or similar document).
- h. In case the complaint registered by the Complainant is found to be frivolous or false, the Complainant will be liable for disciplinary action as per Service Rules on grounds of Misconduct.
- i. In the event the complainant/the person complained against, approaches any external agencies/law enforcement agencies for the resolution of the complaint or any matter incidental/related to the same, the inquiry proceedings will continue till the conclusion is made by the IC. It is the obligation of the person approaching the external/law enforcement agency to report such an action to the IC and the employer.

Annexure II- Details of Internal Committee members

Member	Designated person name
External Member (NGO or another person)	Ms.Chitra Sadhoo
Senior Presiding Officer	Ms.Swati Sinha
Deputy Presiding Officer	Ms.Annapurna Carchalla
Member	Ms.Saumya Dubey
Member	Mr.Subramanian Ananthanarayanan
Member	Dr.Rohit Raj

Annexure III- recording of Evidence

The evidence will be recording as per the following format:

Date of submission	Evidence by	Details of evidence	Signature of submitter



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Signed Presiding Officer

Annexure IV- Formats

1. Inquiry Notice

To,

_____ (name)
_____ (Address)
_____ (employee ID)

Dear _____,

This has reference to a complaint of alleged sexual harassment being filed against you. You are requested to appear before the Internal committee on _at_ hours at the following address.

Sd/-

Presiding Officer

2. Attendance Sheet

Inquiry Details

Member	Complainant	Respondent	Witnesses	Other attendees	Date

Sd/-



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Presiding Officer

3. Order form

Inquiry Details

Date	Order	Pronounced by	Signature

4. Witness Statement

Inquiry Details

Date	Statement	Submitted by	Signature

5. Complainant Statement

Inquiry Details

Date	Statement	Submitted by	Signature

6. Respondent Statement

Inquiry Details

Date	Statement	Submitted by	Signature



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Effective Date	Next Review Date
01 st January 2024	31 st December 2024

Authored by	Reviewed by	Approved by
Annapurna Carchalla	Subramanian Ananthanarayanan	Amit Raj Sinha