
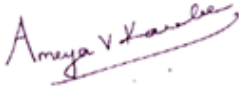





**PREVENTION OF  
SEXUAL HARASSMENT AT  
WORKPLACE POLICY**

## Document Control

### Document Details

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Reviewed By:	Ameya V Karambe	Signature:	
Approved By:	Sunu Mathew	Signature:	

### Revision History

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3	1.2	26/10/2025	Next Review Date

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## Introduction

Taking a LEAP forward in its fight against sexual harassment, the Indian Parliament passed “The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013” (“the Act”). The object of the Act is to provide protection against sexual harassment in the organized as well as the unorganized workplace and provide a proper mechanism of redressal of complaints of sexual harassment.

LEAP India Private Limited (“LEAP”) is committed to provide a work environment that is professional and mature, free from animosity and one that reinforces our value of integrity that includes respect for all individual. Every Employee has the right to be free from sexual harassment and has the right to work in an environment free from any form of sexual harassment in accordance with the Act.

LEAP has zero tolerance to any form of sexual harassment and will take all necessary steps to ensure that its Employees are not subjected to any form of sexual harassment. LEAP will actively promote a social, physical and psychological environment that will raise awareness about and deter acts of sexual harassment against its Employees.

## Purpose

Sexual harassment is not only a serious misconduct but also a criminal offence that can destroy human dignity and freedom. In an order to promote the wellbeing of all the Employees, LEAP has framed a policy on prevention, prohibition and redressal of sexual harassment at workplace (the “Policy”) with the following objectives:

- To uphold the commitment of the company to provide an environment free of discrimination and indecent behavior against individual at workplace.
- To actively promote a social, physical and psychological environment that will raise awareness about and deter acts of sexual harassment of any individual.
- To ensure the implementation of the policy in letter and spirit by undertaking all necessary and reasonable steps including the constitution of appropriate Committees for purposes of gender sensitization and to conduct enquiries into complaints of sexual harassment.
- To evolve a mechanism and forum for the prevention and redressal of sexual harassment.

This Policy has been framed in accordance with the provisions of Act and rules framed thereunder. Accordingly, while the Policy covers all the key aspects of the Act, for any further clarification reference shall always be made to the Act and the provisions of the Act shall prevail. If any aspect relating to sexual harassment not explicitly covered in this Policy is provided for by the law, then the law will be applicable. In case of any conflict between the Policy and the law, the law will prevail.

## Scope & Applicability

This Policy applies to all categories of employees of the LEAP, including

- Employee on a regular, temporary, ad hoc, or daily wage basis, employed 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.
- A contract worker, probationer, trainee, apprentice or called by any other such name, at the workplace or client sites. The Company will not tolerate Sexual Harassment, if engaged in by customers or any other business associates.

The workplace includes:

- All offices, Warehouses or other premises where the Company's business is conducted.
- All Company-related activities performed at any other site away from the Company's premises.
- Any social, business or other functions where the conduct or comments may have an adverse impact on the workplace or workplace relations.
- Any place visited by the Employee arising out of or during employment including official events, accommodation, transportation provided by the Employer for undertaking such a journey.

Each Employee must exercise his or her own good judgment to avoid engaging in conduct that may be perceived by others as Sexual Harassment. In all the above cases, it is not the intention but the impact of any such action which will determine if it will be termed as Sexual Harassment.

## Definitions

- Sexual harassment: "Sexual Harassment" includes any one or more of the following unwelcome acts or behavior (whether directly or by implication)
  - 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:
    - Physical contact and advances; or
    - A demand or request for sexual favors; or
    - Making sexually colored remarks; or
    - Showing pornography, writing sexually loaded letters/emails/SMSs/gestures etc.; or Eve teasing, innuendos and taunts, physical confinement against one's will or any such act likely to intrude upon one's privacy; or
    - Act or conduct by a person in authority which creates the environment at workplace hostile or intimidating to a person belonging to the other sex; or
    - And/or any other unwelcome physical, verbal or non-verbal conduct of sexual nature.

## Scope & Applicability

- The following circumstances if it occurs or is present in relation to any sexually determined act or behavior amount to sexual harassment:
  - Implied or explicit promise of preferential treatment in employment.
  - Implied or explicit threat of detrimental treatment in employment.
  - Implied or explicit threat about the present or future employment status.
  - Interference with the person's work or creating an intimidating or offensive or hostile work environment; or
  - Humiliating treatment is likely to affect an individual's health or safety.

The reasonable person standard is used to determine whether the conduct was offensive and what a reasonable person would have done. 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 individual.

- **Aggrieved Individual:** For the purpose of this Policy, individual of any age whether employed or not, who alleges to have been subjected to any act of Sexual Harassment by LEAP Employee or any third party associated with LEAP at any office or premises of LEAP.
- **Respondent:** A person against whom a complaint of sexual harassment has been made by the aggrieved Individual.
- **Presiding Officer:** A senior woman employee heads the team of ICC and is responsible for ensuring that investigation of a complaint is conducted in an unbiased/ fair manner & confidentiality of the investigation proceedings is maintained.
- **Employee:** For the purpose of this Policy, the term "Employee" means a person employed 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 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 other such name.
- This broad definition of 'Employee' used for the purpose of this Policy cannot be used to claim rights of an Employee conferred by any other law in India and this definition is only for the purpose of this Policy. It is hereby clarified that the Policy shall govern the Employees and other persons residing in India.
- **Employer:** For the purpose of this Policy, the term "Employer" means Managing Director of LEAP.
- **Internal Complaints Committee or ICC:** For the purpose of this Policy, committee is formed to investigate complaints of Sexual Harassment referred to it and makes appropriate recommendations to the Employer.

## **Constitution Of Internal Complaints Committee**

To prevent instances of sexual harassment and to receive and effectively deal with complaints pertaining to the same, Internal Complaints Committees (ICC) have been appointed. The details of the committee are notified to all covered persons at the location (workplace).

The committee 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 or who have had experience of social work or have legal knowledge
- One external 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
- At least one half of the total members nominated being women

Current nominated members of the committees are given in Annexure 1. The committee will be responsible for:

- Receiving complaints of sexual harassment at the workplace
- Initiating and conducting inquiry as per the established procedure
- Submitting findings and recommendations of inquiries
- Coordinating with the employer in implementing appropriate action
- Maintaining strict confidentiality throughout the process as per established guidelines
- Submitting annual reports in the prescribed format

The ICC will meet once every quarter to discuss Complaints and issues received by it and the course of actions and status on each. The ICC should also meet even if there are no formal Complaints made to discuss the overall scenario of safety at Workplace and precautions needs to be taken to further strengthening of system.

## **Removal Or Replacement of ICC Members or Presiding Officer**

Removal or replacement of ICC members or presiding officer will happen in the event Presiding Officer and / or any member of the ICC:

- Contravenes any provisions of the Policy; or
- Has been convicted for an offence or an inquiry into an offence under any law for the time being in force is pending against him / her; or
- Has been found guilty in any disciplinary proceedings or a disciplinary proceeding is pending against him / her; or
- Has so abused his / her position as to render his / her continuance in office prejudicial to public interest, such Presiding Officer or member, shall be removed from the ICC; or

- Voluntary separation of a Presiding Officer and / or Member from ICC or from LEAP. In case of voluntary separation or removal of Members from ICC, Presiding Officer shall fill such vacancy and in case there is voluntary separation or removal of a Presiding Officer then in such case Employer shall appoint Presiding Officer.
- The Presiding Officer and every member of the ICC shall hold the office for a period not exceeding three years from the date of their nomination and ICC would work strictly as per provisions of the Act.

## Procedure For Filing Complaints

Complaint redressal mechanism:

- An Aggrieved Individual may make in writing (Annexure 2), a Complaint of Sexual Harassment to the ICC at POSH@leapindia.net, within a period of three (3) months from the date of the incident and in case of series of incident, within a period of three (3) months from the date of last incident.
- Where the ICC is satisfied that the circumstances were such which prevented the Aggrieved Individual from filing a complaint within the said period of three months, the ICC may extend the time limit beyond 3 months, by recording the reasons in writing.
- Where the Aggrieved Individual is unable to make a Complaint on account of his/ her physical incapacity, a Complaint may be filed by -
  - His/ Her relative or friend; or
  - His/ Her co-worker; or
  - An officer of the National Commission for Women or State Commission for Women; or
  - Any person who has knowledge of the incident, with the written consent of the Aggrieved Individual.
- Where the Aggrieved Individual is unable to make a Complaint on account of his/ her mental incapacity, a Complaint may be filed by
  - His/her relative or friend; or
  - A special educator; or
  - A qualified psychiatrist or psychologist; or
  - The guardian or authority under whose care he/she is receiving treatment or care; or
  - Any person who has knowledge jointly with his/her 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;
- Where the Aggrieved Individual for any other reason is unable to make a Complaint, a Complaint may be filed by a person who has knowledge of the incident, with his/her written consent;
- Where the Aggrieved Individual 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(s).



- A Complaint may also be made orally. If the Complaint is oral, member of the ICC to whom the Complaint is made shall record the same in writing, in detail, and have the contents confirmed by the Complainant.

## **Procedure for Resolution, Settlement or Prosecution**

- Conciliation - The ICC may, before initiating an inquiry, at the request of the Aggrieved Individual, take steps to settle the matter between him/ her and the Respondent. The conciliation shall not be on a monetary settlement basis. The settlement terms shall be recorded in writing and forwarded to Employer for action if required. Copies of the same shall be provided to the Aggrieved Individual and the Respondent. Where a settlement has been arrived at, no further inquiry shall be conducted by the ICC. This is only if requested by the Aggrieved Individual.
- If the above is not possible or no conciliation is requested by the Aggrieved Individual or Aggrieved Individual informs ICC that any term or condition of the settlement arrived through conciliation, has not been complied with by Respondent, the ICC shall proceed to make inquiry into the Complaint in such manner as prescribed here under:
  - The Complainant or the person lodging a Complaint on behalf of the Complainant shall file, with the ICC, 6 written copies of the Complaint along with the supporting documents and names and addresses of witnesses.
  - On receipt of the Complaint the ICC shall within a period of 7(Seven) days send one of the copies of the Complaint to the Respondent.
  - The Respondent shall, within a period of 10 (Ten) days from the date of receipt of Complaint from the ICC, file his reply to the Complaint along with his/her list of documents, names and addresses of witnesses.
  - The ICC shall investigate the complaint and provide its report as promptly as possible, no later than 90 working days from the date of the Complaint.
  - The ICC shall follow principles of natural justice in all its proceedings and subject thereto, shall maintain confidentiality of the identity of the Complainant, and the witnesses, as also the contents of the Complaint.
  - In conducting the enquiry, a minimum of 3(Three) ICC members including the Presiding Officer should remain present.
  - Upon receipt of the responses from the Respondent and the Complainant, the ICC shall conduct a hearing at such venue or venues as are convenient to the Complainant, where both the Complainant and the Respondent shall be heard in person. The ICC shall notify both the Respondent and Complainant (as well as the witnesses, if any) of the time and venue of each hearing. Any records of the proceedings of such or any other hearings or meetings of the ICC shall be maintained strictly confidential.
  - For the purpose of making an inquiry into the complaint the ICC shall have powers of the civil court as under:

- Summoning and enforcing attendance of any person and examining him/her on oath
- Requiring the discovery and production of documents; and Any other matter which may be prescribed
- Upon completion of the hearing, the ICC shall prepare its written report which shall include a summary of the proceedings, the evidence adduced by the parties and the witnesses, and shall submit the same to employer. The said report shall further set out the ICC's conclusions on whether an offence of Sexual Harassment, or any other violation of this Policy, has been committed or occurred, or whether the Complaint made by the Complainant is either false or unproven, as also the reasons/ rationale for the ICC arriving at such conclusion. The said report shall further set out the ICC's recommendations on the disciplinary action(s) to be taken against the Respondent or Complainant (as the case may be). All members of the ICC shall sign the said report.
- Where the ICC arrives at a conclusion that the allegations against the Respondent have been proved, it shall recommend the following:
  - To act for sexual harassment as an act of misconduct in accordance with the rules/regulations of LEAP.
  - To deduct such amounts from the salary or wages of the Respondent as may be considered appropriate to be paid to the Complainant as per this Policy.
  - In addition to the above, the recommendations may also include one or more of the following, Counselling; Written apology; Warning; Reprimand or Censure; Withholding of promotion; Withholding of pay rise or increments; Termination of service of the Respondent or any other action that the employer may deem fit.
- Where the ICC arrives at a conclusion that the allegations against the Respondent have not been proved, then the ICC recommends to the Employer that no action is required to be taken in said matter.
- Based on the recommendations of the ICC, if either the aggrieved employee or the alleged respondent is an employee of LEAP it shall transfer either party to any other workplace as it deems fit and proper. The place of transfer shall be as per company's requirements and neither the Aggrieved Employee nor the alleged Respondent shall have any choice in the matter.
- During the pendency of the inquiry, if the ICC is independently of the view that the presence of the alleged Respondent at the workplace may be detrimental to the interest or conduct of a free and fair inquiry, it can recommend to Employer to place the alleged Respondent under suspension till completion of the inquiry, provided that the person sought to be suspended is a direct employee of LEAP.
- It is the duty of all parties concerned, i.e. the Aggrieved Individual , Alleged Respondent, and/or the witnesses, to maintain utmost secrecy and confidentiality with regard to the identity of the Aggrieved Individual , details of the Complaint, inquiry proceedings, findings, recommendations, and action taken by Company. All parties involved in any Sexual Harassment matter must keep all aspects of the matter confidential.

- Any person aggrieved from the recommendations made by ICC or non-implementation of such recommendations may prefer an appeal to the appellate authority as per the provisions of the Act.

## **Role And Responsibilities of Employer**

- Provide a safe working environment at the workplace which shall include safety from the persons coming into contact at the workplace
- Display at any conspicuous place in the workplace, the penal consequences of sexual harassment, and the order constituting the ICC
- Organize workshops and awareness programs at regular intervals for sensitizing the employees with the provisions of the Act and conduct orientation programs for the members of the ICC in the manner as may be prescribed
- Provide necessary facilities to the ICC for dealing with the complaint and conducting an inquiry
- Treat sexual harassment as a misconduct under the service rules and initiate action for such misconduct.

## **Malicious Or False Complaints**

During investigation, if the ICCs conclude that the Complaint is not a genuine one and the Aggrieved Individual or Complainant has made the Complaint knowing it to be false or with malicious intent or the Aggrieved Individual or Complainant has produced any forged or misleading document, the ICC will recommend the Employer to issue a warning letter to the Aggrieved Individual or Complainant or any other suitable action as required.

Action could also be recommended against Employees who abetted the misconduct knowingly. Written warning could also be issued to Employees who were in the knowledge of this however did not highlight the same.

## **Relief To Employees During the Pendency of An Inquiry**

During the pendency of the inquiry of the ICCs, on a written request by the Aggrieved Individual, the ICCs can recommend the following to the Employer:

- Restrain the Respondent from reporting on the work performance of the Aggrieved Individual or writing his/her confidential report and assign the same to another officer.
- The ICCs can also recommend to the Employer the transfer of an Aggrieved Individual or Respondent to another unit.
- Grant leaves up to a period of three months to Aggrieved Individual which shall be over and above the official leave.
- Grant such other relief to the Aggrieved Individual as may be prescribed. Nothing in these guidelines should be taken in any way as a limitation on the powers of the Employer to decide what disciplinary action(s) appropriate under given circumstances.

## **Appeal**

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

## **Confidentiality**

The contents of the Complaint, the identity and addresses of the Aggrieved Individual, Respondent and Witnesses, any information relating to conciliation and inquiry proceedings, recommendations of the ICC, as the case may be, and the action taken by the Employer shall not be published, communicated or made known to the public, press and media in any manner. If the same is violated, the Company from, such person, shall act as per the provisions of the service rules. Provided that information may be disseminated only by the Employer regarding the justice secured to any victim of Sexual Harassment under this Act without disclosing the name, address, identity or any other particulars that may lead to the identification of the Aggrieved Individual and Witnesses.

## **Employee Education**

All Employees shall be bound to follow and make themselves aware of this Policy and ensure that they have read the same. A copy of this Policy will be given to all new Employees on joining.

## **MIS Reporting and Metrics**

Board update on PSH shall be shared for board meeting as per plan. The ICC will submit a report comprising details of all cases and actions taken and provide for the following details:

- No of issues not resolved within stipulated timelines by ICC to be shared with the Employer
- No of complaints received & reported within timelines in a month by ICC to the Employer
- No of cases pending for more than ninety days
- Number of workshops or awareness programs carried out
- Nature of action taken by the Employer

## **Assumptions & Exceptions**

Any exception to these Policy guidelines will be considered on a case-to-case basis and the same must be approved by the Employer. The interpretation of this Policy rests exclusively with the Employer and the decision of the Employer shall be final and binding on all Employees.

Any Employee who wishes to get in touch with ICC, kindly send in your written complaint to The Presiding officer, address for further action. ICC will get in touch with you at the earliest.

## **Review & Responsibility**

This Policy will be reviewed to incorporate any necessary updates or changes, as and when necessary. The responsibility for conducting the review lies with the Human Resource Department.

## Annexure 1

### Internal Complaints Committee (PoSH)

Sr. No.	Name	Cell No.	Committee	Email Address
1	Dr. Anagha Sarpotdar	7506907837	External	anagha.sarpotdar@gmail.com
2	Shraddha Sawant	9152031388	Internal - Presiding Officer	shraddha.sawant@leapindia.net
3	Ameya Karambe	8454922025	Internal	ameya.karambe@leapindia.net
4	Pooja Ambekar	8655897073	Internal	pooja.ambekar@leapindia.net
5	Priti Vinchhi	8657504746	Internal	priti.vinchhi@leapindia.net
6	Dimple Kodwani	8291033590	Internal	dimple.kodwani@leapindia.net
7	Jai Sancheti	7045040853	Internal	jai.sancheti@taron.in
8	Harish Rane	9819007082	Internal	harish.rane@leapindia.net

## Annexure 2

### TEMPLATE FOR REPORTING SEXUAL HARASSMENT (FOR REFERENCE PURPOSE)

**To:**  
**The Internal Complaints Committee**

**Sexual Harassment details:**

Who is/are the person/people involved in this sexual harassment case? Please provide the name designation, Unit, Business and relationship with you (e.g. supervisor, colleague etc.)

**Critical Incidents and Factual Data:**

- a. Please describe the incident/s
- b. List supporting information/ data that you would have, that ICC can seek from you while investigating. E.g. exact date/s, place/s of the incident/s, witnesses, if any, text messages, emails etc.

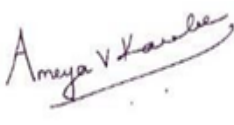

**Date: Location:** \_\_\_\_\_

**Name of the Person reporting:** \_\_\_\_\_

**Contact Information:** \_\_\_\_\_

**(Mention official e-mail id / cell no)**

For **LEAP India Private Limited**

**Ameya V Karambe**  
**General Manager - Human Resources & Administration**