



**JAIDEEP ISPAT & ALLOYS PRIVATE LIMITED**

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**JAIDEEP ISPAT & ALLOYS PRIVATE LIMITED  
JAIDEEP STEELWORKS INDIA PRIVATE LIMITED**

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**POLICY ON PREVENTION, PROHIBITION AND  
REDRESSAL OF SEXUAL HARASSMENT AT THE  
WORKPLACE (POSH)**

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# JAIDEEP ISPAT & ALLOYS PRIVATE LIMITED

## I. PREAMBLE

**Jaideep Ispat & Alloys Private Limited** (hereinafter referred to as “**Company**”) is committed to fostering a safe, respectful, and inclusive work environment for all employees. We recognize that every individual has the right to work in an environment free from any form of harassment, including sexual harassment. This Prevention of Sexual Harassment (POSH) Policy reflects our commitment to upholding the dignity of all employees, ensuring their physical and emotional well-being, and providing a workplace where all individuals can thrive without fear of discrimination or harm.

Sexual harassment, in any form, is strictly prohibited within our organization. This Policy aims to define what constitutes sexual harassment, establish clear procedures for reporting and addressing complaints, and ensure that appropriate action is taken to prevent and address any incidents of sexual harassment. We strive to create a culture of mutual respect and accountability, where every employee feels valued, empowered, and protected.

By implementing this Policy, the Company aims to uphold the principles of equality, respect, and dignity, ensuring that every individual can work in an environment that is free from sexual harassment and intimidation.

## II. PURPOSE AND MANDATE

As laid down in the Hon’ble Supreme Court’s judgment in the case of Vishaka & Ors. v. State of Rajasthan & Ors. [(1997) 6 SCC 241] and under the Sexual Harassment of Women at Workplace (Prevention, Prohibition, and Redressal) Act, 2013 (“**Act**”) along with the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Rules, 2013 (“**Rules**”), every employer shall be committed to provide to all its employees, equal opportunity and a sexual harassment free workplace, notwithstanding race, caste, religion, colour, ancestry, marital status, gender, sexual orientation, age, nationality, ethnic origin or disability, as the case may be. Thus, in order to create such a safe and conducive work environment, especially women employees, the Prevention of Sexual Harassment (POSH) Policy (“**Policy**”) is being framed, in line with the provisions of the prevailing Act and Rules, for any further clarification and/or in case of conflict between Policy and Act, reference shall always be made to the Act and the provisions of the Act shall prevail over the Policy.



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The main objective of the Policy is to provide its women employees, a workplace, free from sexual harassment/discrimination and to treat them with dignity and respect. Further, it also emphasizes on prevention, prohibition and redressal of complaints of sexual harassment and matters related to it.

This is a Zero-tolerance Policy against Sexual Harassment, incorporating the Rules and procedures as mandated in the Act. This Policy shall encourage employees to come forward to report any sexual misconduct, without any fear of retaliation and with an assurance that the complaint shall be taken seriously and an un-biased inquiry shall be conducted.

### III. SCOPE AND APPLICABILITY

This is a universal Policy which is applicable across all departments, units, and subsidiaries of the Company. It applies to all categories of Employees, (as defined in the "Definitions" section), including but not limited to contractors, vendors, clients, and visitors etc., both within and outside the Company's premises.

The term "workplace" encompasses the following including but not limited to:

#### **Company Premises:**

All offices or other premises where the Company's business operations are conducted.

#### **Off-Premises:**

Any Company-related activities performed at locations away from the Company's premises.

#### **Travel and Transportation:**

Any place visited by the employee during the course of employment, including travel or transportation arranged by the Company for such business-related journeys. (as provided under definition of "workplace" [Section 2(o)(v)] of the Act).

#### **Virtual Workspaces:**

All digital or online platforms where work-related interactions occur, including but not limited to online meetings, emails, text messages, and other virtual communication channels.



#### IV. DEFINITION OF SEXUAL HARASSMENT (as defined under Section 2(n) of the Act)

A. "Sexual Harassment" includes any one or more of the following unwelcome acts or behaviour (whether directly or by implication) namely: -

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

B. Further, **Section 3(2) of the Act** mentions that 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: –

- i. implied or explicit promise of preferential treatment in her employment; or
- ii. implied or explicit threat of detrimental treatment in her employment; or
- iii. implied or explicit threat about her present or future employment status; or
- iv. interference with her work or creating an intimidating or offensive or hostile work environment for her; or
- v. Humiliating treatment likely to affect her health or safety.

*For a detailed understanding of the Do's and Don'ts of Sexual Harassment, please refer Annexure - I.*

#### V. OTHER IMPORTANT DEFINITIONS

- i. **Aggrieved Woman [Section 2(a)(i)]**: means in relation to a workplace, a woman, of any age whether employed or not, who alleges to have been subjected to any act of sexual harassment by the respondent.
- ii. **Complaint**: Complaint is meant to construed, defined understood and interpreted as a formal allegation of sexual harassment in writing or otherwise by the Aggrieved Woman to the Internal Complaints Committee.
- iii. **Complainant**: A Complainant is an aggrieved woman (including those when the aggrieved woman is unable to make a complaint on account of her physical or mental incapacity or death or otherwise) who makes a Complaint alleging Sexual Harassment under this Policy.



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- iv. **Conciliation:** Conciliation is a process to resolve conflict/complaint by the Internal Complaints Committee on the specific request of the aggrieved woman in the manner provided under the Act.
- v. **Employee [Section 2(f)]:** 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.
- vi. **Employer [Section 2(g)(ii) & (iii)]:** Any person responsible for the management, supervision and control of the workplace and the person discharging contractual obligations with respect to his or her employees.
- vii. **Incident [Rule 2(d)]:** An incident of Sexual Harassment as defined under Section 2(d) of the Act.
- viii. **Internal Committee [Section 2(h)]:** Internal Committee means an Internal Complaints Committee constituted under Section 4 of the Act.
- ix. **Presiding Officer [Section 2(l)]:** The Presiding Officer of the Internal Complaints Committee nominated under Section 4(2) of the Act.
- x. **Respondent [Section 2(m)]:** A person against whom the aggrieved woman has made a complaint under Section 9.
- xi. **Special Educator [Rule 2(f)]:** A person trained in communication with people with special needs in a way that addresses their individual differences and needs.

## VI. ROLES AND RESPONSIBILITIES

### A. EMPLOYEES

- i. Employees are expected to act towards other colleagues/Employees professionally and respectfully, and in a cordial manner. This can be done by:
  - a. refusing to participate in any activity which constitutes Sexual Harassment;
  - b. supporting the person to reject unwelcome behaviour;
  - c. acting as a witness if the person being harassed decides to lodge a complaint.



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- ii. All are encouraged to advise others of behaviour that is unwelcome. Often, some behaviours are not intentional, while this does not make it acceptable, it does give the person behaving inappropriately, the opportunity to modify or stop their offensive behaviour.
  - iii. Employees, who believe they have been treated in an improper and offensive manner and feel that they are being sexually harassed, may file a complaint with the Internal Complaints Committee, The Complaint shall be filed within the maximum period of 3 months from the date of incident/last incident. They can take assistance from the Presiding Officer or any member of the Internal Complaints Committee.

### **B. COMPLAINANTS, RESPONDENTS AND WITNESSES**

- i. Complainants are expected to provide accurate and detailed information regarding the incident of Sexual Harassment.
- ii. Respondents shall hold the responsibility to provide honest and accurate responses to the allegations made against them
- iii. Witnesses shall hold an obligation to provide truthful and relevant information as required during the inquiry.
- iv. The Complainants, Respondents and Witnesses are required to-
  - a. co-operate fully with the Internal Complaints Committee during the investigation.
  - b. maintain confidentiality about the complaint, disclosing details only to those who are required to know and/or to the Internal Complaints Committee (ICC).
  - c. review their statement for accuracy before the final report is submitted, making only necessary corrections.
  - d. receive information about the investigation's outcome and the final report.

### **C. EMPLOYER [Section 19 of the Act]**

- i. Every Employer shall –
  - a. ensure a safe workplace free from sexual harassment, including safety from others who may interact with employees.
  - b. display the penal consequences of Sexual Harassment and the order constituting the Internal Committee under Section 4(1) of the Act at any conspicuous place in the workplace.



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- c. organise workshops and awareness programmes at regular intervals to educate employees about the provisions of the Act and conduct orientation programmes for the members of the Internal Committee.
- d. provide necessary resources and facilities to the Internal Committee for dealing with the complaint and conducting an inquiry.
- e. assist in securing the attendance of Respondent and witnesses before the Internal Committee.
- f. Make available such information to the Internal Committee that may be required in relation to the complaint filed under Section 9(1) of the Act.
- g. Provide assistance to the Aggrieved Woman if she so chooses to file a complaint in relation to the offence under the Bharatiya Nyaya Sanhita, 2023.
- h. Cause to initiate action under the Bharatiya Nyaya Sanhita, 2023 against the Respondent, or if the Aggrieved Woman so desires, where the Respondent 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 Act and initiate action for such misconduct.
- j. Monitor the timely submission of reports by the Internal Committee.

### VII. INTERNAL COMPLAINTS COMMITTEE

The employer of every workplace shall, through a written order, establish a Committee to be called the “Internal Complaints Committee” [Section 4(1) of the Act].

#### A. Constitution of the Internal Complaints Committee [Section 4(2) of the Act]

The Internal Committees shall consist of the following members to be nominated by the employer:

<b>Presiding Officer</b>	A woman employed at a senior level at workplace from amongst the employees.
<b>Two Member Employees</b>	Employees preferably committed to the cause of women or who have had experience in social work or have legal knowledge.



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<b>One NGO/Associations Member</b>	Committed to the cause of women or a person familiar with the issues relating to sexual harassment.
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*Note: - For the purpose of establishing an internal Complaints Committee (ICC) under the Act and Rules, the composition of the Company's ICC is outlined in the **Annexure – 2.***

### **B. Objectives of the Internal Complaints Committee**

- i. To ensure the implementation of the policy in letter and spirit to uphold the commitment of the Company to provide an environment free of gender-based discrimination;
- ii. Receiving complaints of Sexual Harassment at the workplace;
- iii. Initiating and conducting inquiry as per the established procedure;
- iv. To deal with cases of discrimination and Sexual Harassment of the Complainant, in a time bound manner, aiming at ensuring support services to the Complainant and prevention of the Sexual Harassment;
- v. Submitting reports of its findings and recommendations to the Employer.
- vi. Follow-up with the employer in implementing appropriate action;
- vii. Maintaining strict confidentiality throughout the process as per established guidelines;
- viii. Submitting annual reports in the prescribed format; and
- ix. To follow any other procedure as mandated under the Act.

### **C. Removal of Presiding Officer or any Member of the Internal Complaints Committee [Section 4(5) of the Act]**

If the Presiding Officer or any Member of the Internal Complaints Committee:

- i. contravenes the provisions of Section 16 (Prohibition of publication or making known contents of complaint and inquiry proceedings) of the Act which states that –

Notwithstanding anything contained in the Right to Information Act, 2005, the contents of any complaint, the identity and addresses of the aggrieved woman, respondent, witnesses, information on conciliation and inquiry proceedings, recommendations of the Internal Committee, and actions taken by the employer shall not be disclosed to the public, press, or



media. However, information may be shared about the justice provided to the victim without revealing any details that could identify the aggrieved woman or witnesses.

- ii. 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; or
- iii. he has been found guilty in any disciplinary proceedings or a disciplinary proceeding is pending against him; or
- iv. has so abused his position as to render his continuance in office prejudicial to the public interest,

such Presiding Officer or Member, as the case may be, shall be removed from the Committee and the vacancy so created or any casual vacancy shall be filled by fresh nomination in accordance with the provisions of this section.

### **VIII. GRIEVANCE REDRESSAL MECHANISM : PROCEDURE TO REGISTER COMPLAINTS**

#### **A. LODGING OF COMPLAINT**

- i. Any Aggrieved Woman who feels and is being sexually harassed, directly or indirectly, needs to submit detailed Complaint, along with any documentary evidence available or names of witnesses, to the Internal Committee at the workplace.
- ii. The Complaint can be submitted to the Internal Complaints Committee electronically at [moiracareforwomen@gmail.com](mailto:moiracareforwomen@gmail.com) or may be physically submitted to any Internal Complaints Committee member. For any further assistance, the Complainant can reach out to the **Helpline No.: 8889914382**.
- iii. The Internal Complaints Committee shall not be bound to accept oral Complaints under this Policy.
- iv. The Complaint must be lodged within 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.
- v. Provided that where such a complaint cannot be made in writing, the Presiding Officer or any Member of the Internal Committee shall render all reasonable assistance to the Complainant for making the Complaint in writing.



**vi. Complaint of Sexual Harassment [Rule 6 of the Rules] - In accordance with Section 9(2) of the Act–**

- a. where the Aggrieved Woman is unable to make a Complaint on account of her physical incapacity, a complaint may be filed by –
  - her relative or friend; or
  - her co-worker; or
  - an officer of the National Commission for Women or State Women’s Commission; or
  - any person who has knowledge of the Incident, with the written consent of the Aggrieved Woman.
- b. where the Aggrieved Woman is unable to make a Complaint on account of her mental incapacity, a complaint may be filed by –
  - her relative or friend; or
  - a special educator; or
  - a qualified psychiatrist or psychologist; or
  - the guardian or authority under whose care she is receiving treatment or care; or
  - any person who has knowledge of the Incident jointly with her relative or friend or a special educator or qualified psychiatrist or psychologist, or guardian or authority under whose care she is receiving treatment or care.
- c. where the Aggrieved Woman for any other reason is unable to make a Complaint, a Complaint may be filed by any person who has knowledge of the Incident, with her written consent.
- d. where the Aggrieved Woman is dead, a Complaint may be filed by any person who has knowledge of the Incident, with the written consent of her legal heir.

**B. RESOLUTION PROCEDURE THROUGH CONCILIATION [Section 10 of the Act]**

- i. Once the Complaint is received, the Internal Committee may, before initiating an inquiry under Section 11 of the Act and at the request of the Aggrieved Woman take steps to settle the matter between her and the Respondent through Conciliation.
- ii. Provided that no monetary settlement shall be made as a basis of Conciliation.



- iii. Where a settlement has been arrived under clause (i) above, the Internal Committee shall record the settlement so arrived and forward the same to the Employer to take action as specified in the recommendation.
- iv. The Internal Committee shall provide the copies of the settlement as recorded in clause (iii) above, to the Aggrieved Woman and the Respondent.
- v. Where the settlement is arrived, no further inquiry shall be conducted by the Internal Committee.

### **C. RESOLUTION PROCEDURE THROUGH FORMAL INQUIRY [Section 11 of the Act]**

#### **a. Conducting Inquiry:**

The Committee initiates inquiry in the following cases:

- i. No Conciliation is requested by the Aggrieved Woman; or
- ii. Conciliation has not resulted in any settlement; or
- iii. Complainant informs the Internal Committee that any terms or conditions of the settlement arrived through Conciliation, has not been complied with by the Respondent.

#### **b. Manner of Inquiry into the Complaint [Rule 7 of the Rules]:**

- i. Subject to the provisions of Section 11, at the time of filing the complaint, the complainant shall submit to the Complaints Committee, six (6) copies of the Complaint along with supporting documents and the names and addresses of the witnesses.
- ii. On receipt of the Complaint, the Complaints Committee shall send one of the copies received from the aggrieved woman under clause (i) above, to the Respondent within a period of seven (7) working days.
- iii. The Respondent shall file his reply to the Complaint along with his list of documents, and names and addresses of the witnesses, within a period not exceeding ten (10) working days from the date of receipt of the documents specified under clause (i) above.
- iv. The Complaints Committee shall make an inquiry into the Complaint in accordance with the principles of natural justice.
- v. The Complaints Committee shall have the right to terminate the inquiry proceedings or to give an *ex-parte* decision on the Complaint, if the Complainant and Respondent fails, without sufficient cause, to present herself or himself for three (3) consecutive hearings convened by the Presiding Officer:



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Provided that such termination or ex-parte order may not be passed without giving a notice in writing, fifteen (15) days in advance, to the party concerned.

- vi. The parties shall not be allowed to bring in any legal practitioner to represent them in their case at any stage of the proceedings before the Internal Complaints Committee.
- vii. In conducting the inquiry, a minimum of three (3) members of the Internal Complaints Committee including the Presiding Officer shall be present.

**c. *Audi Alteram Partem*:**

During the course of inquiry, the Complainant and the Respondent shall be given an opportunity of being heard and a copy of the findings shall be made available to both the parties enabling them to make representations against the findings before the Internal Complaints Committee.

**d. Completion of Inquiry [Section 11(4) of the Act]:**

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

**e. Interim Relief [Section 12 of the Act]:**

- i. During the pendency of the inquiry, on a written request made by the Complainant, the Internal Complaints Committee may recommend to the Employer to –
  - a. transfer the Complainant or the Respondent to any other workplace; or
  - b. grant leave to the Complainant of maximum three (3) months, in addition to the leave she would otherwise be entitled;
  - c. prevent the Respondent from assessing Complainant's work performance.
- ii. On the recommendations of the Internal Complaints Committee, the Employer shall implement the recommendations made in clause (i) above, and send the report of such implementation to the Internal Committee.

### **D. INQUIRY REPORT AND ACTION**

- i. On the completion of an inquiry under this Act, the Internal Complaints Committee shall provide a report of its findings to the Employer, within a period of ten (10) days from the date of completion of the inquiry and such report be made available to the concerned parties.

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**a. Complaint Unsubstantiated [Section 13(2) of the Act]:**

Where the Internal Complaints Committee, arrives at the conclusion that the allegation against the Respondent has not been proved, it shall recommend to the Employer that no action is required to be taken in the matter.

**b. Complaint Substantiated [Section 13(3) of the Act]:**

Where the Internal Complaints Committee, arrives at the conclusion that the allegation against the Respondent has been proved, it shall recommend to the Employer –

- To take action for Sexual Harassment as a misconduct including a written apology, warning, reprimand or censure, withholding of promotion, withholding of pay rise or increments, terminating the Respondent from service or undergoing a counselling session or carrying out community service in accordance with Rule 9.
- To deduct from the salary or wages of the Respondent such sum as it may consider appropriate to be paid to the Aggrieved Woman or to her legal heirs, as it may determine, in accordance with the provisions of Section 15:

Provided that in case the employer is unable to make such deduction from the salary of the Respondent due to him being absent from duty or cessation of employment it may direct to the Respondent to pay such sum to the Aggrieved Woman:

Provided further that in case the Respondent fails to pay the sum mentioned above, the Internal Committee may forward the order for recovery of the sum as an arrear of land revenue to the concerned District Officer.

**ii. Procedure for Determination of Compensation [Section 15 of the Act]**

For the purpose of determining the sums to be paid to the Aggrieved Woman under Section 13, the Internal Committee, shall have regard to—

- (a) the mental trauma, pain, suffering and emotional distress caused to the aggrieved woman;
- (b) the loss in the career opportunity due to the incident of sexual harassment;
- (c) medical expenses incurred by the victim for physical or psychiatric treatment; (d) the income and financial status of the respondent;
- (d) feasibility of such payment in lump sum or in instalments.

**iii. The Employer shall act upon the recommendation within sixty (60) days of its receipt by him.**



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Please refer **Annexure – 3** for the Grievance Redressal Mechanism Flow Chart.

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### IX. NON-RETALIATION

The Company will not accept, support or tolerate retaliation in any form against any Employee who, acting in good faith, reports suspected misconduct, asks questions or raises concerns.

Any person who engages in such retaliation directly or indirectly, or encourages others to do so, may be subject to appropriate disciplinary action:

- i. Retaliation will be treated as a major misconduct.
- ii. Retaliation against those reporting Sexual Harassment is prohibited by this policy.
- iii. Retaliation means and includes any hurtful employment action against an individual/s.
- iv. Anyone suspecting or experiencing retaliation should report to the appropriate authorities.

### X. PENAL CONSEQUENCES IN CASE OF SEXUAL HARASSMENT

In addition to the action which the Employer may initiate under the Sexual Harassment of Women at Workplace (Prevention, Prohibition & Redressal) Act, 2013, the following liability may arise under the Bharatiya Nyaya Sanhita, 2023.

Under the Bharatiya Nyaya Sanhita (BNS) 2023, Section 75 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.

(1) A man committing any of the following acts:

- (i) physical contact and advances involving unwelcome and explicit sexual overtures; or
- (ii) a demand or request for sexual favours; or
- (iii) showing pornography against the will of a woman; or
- (iv) making sexually coloured remarks, shall be guilty of the offence of sexual harassment.

(2) Any man who commits the offence specified in clause (i) or clause (ii) or clause (iii) above, shall be punished with rigorous imprisonment for a term which may extend to three years, or with fine, or with both.



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(3) Any man who commits the offence specified in clause (iv) above shall be punished with imprisonment of either description for a term which may extend to one year, or with fine, or with both.

In addition to Section 75 set out above, acts of Sexual Harassment may also constitute other offenses under Bharatiya Nyaya Sanhita (BNS) 2023 including Section 74 (Assault or Criminal Force to Woman with intent to Outrage her Modesty), Section 77 (Voyeurism), Section 78 (Stalking), Section 63 and 64 (Rape) and Section 79 (Word, Gesture or act intended to insult the Modesty of a Woman) of the Bharatiya Nyaya Sanhita (BNS) 2023.

### **XI. FALSE OR MALICIOUS COMPLAINT AND FALSE EVIDENCE**

#### **i. False Complaint:**

If the Internal Committee arrives at a conclusion that –

- a. the allegation against the Respondent is malicious; or
- b. the Aggrieved Woman or any other person making the Complaint has made the Complaint knowing it to be false; or
- c. the Aggrieved Woman or any other person making the Complaint has produced any forged or misleading document,

it may recommend to the Employer to take action against the Woman or the person who has made the Complaint under Section 9, in accordance with the provisions of Rule 9 and Rule 10:

Provided that a mere inability to substantiate a Complaint or provide adequate proof need not attract action against the Complainant:

Provided further that the malicious intent on part of the complainant shall be established after an inquiry, before any action is recommended.

#### **ii. False Evidence:**

If the Internal Committee arrives at a conclusion that during the inquiry any witness has given false evidence or produced any forged or misleading document, it may recommend to the Employer of the witness, to take action in accordance with the provisions of Rule 9 and Rule 10.



**XII. CONFIDENTIALITY [Section 16 of the Act]**

- i. The contents of the complaint made under Section 9, the identity and addresses of the Aggrieved Woman, Respondent and Witnesses, any information relating to Conciliation and Inquiry proceedings, recommendations of the Internal Complaints Committee and the action taken by the Employer under the provisions of the Act shall not be published, communicated or made known to the public, press and media in any manner.
- ii. **Penalty for publication or making known contents of complaint and inquiry proceedings [Section 17]** — If any person entrusted with the duty to handle or deal with the complaint, inquiry or any recommendations or action to be taken under the provisions of this Act, contravenes the provisions of section 16, he shall be liable for penalty of five thousand rupees (Rs. 5000/-) which shall be paid to the Employer.

**XIII. APPEAL [Section 18 of the Act]**

- i. Any person aggrieved from the recommendations made by the Internal Complaints Committee or non-implementation of such recommendations, may prefer an appeal to the appellate authority notified under Section 2 (a) of the Industrial Employment (Standing Orders) Act. 1946.
- ii. The appeal mentioned above, shall be preferred within a period of ninety (90) days of the recommendations.

**XIV. ANNUAL REPORT [Section 21 and Section 22 of the Act]**

- i. As per the provisions laid down under Section 21 and Section 22 of the Act and Rule 14 of the Rules, the Internal Complaints Committee shall in each calendar year prepare an annual report giving the following details and submit the same to the Employer and the District Officer:
  - a. number of complaints of Sexual Harassment received in the year;
  - b. number of complaints disposed off during the year;
  - c. number of cases pending for more than ninety (90) days;
  - d. number of workshops or awareness programme against Sexual Harassment carried out;
  - e. nature of action taken by the employer or District Officer.



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- ii. The Employer shall include in its report the number of cases filed, if any, and their disposal under this Act in the annual report of his organisation or where no such report is required to be prepared, intimate such number of cases, if any, to the District Officer.

### **XV. MODIFICATION AND REVIEW OF THE POLICY**

Jaideep Ispat and Alloys Private Limited reserves the right to modify and, or review the provisions of this Policy, so as to comply with applicable legal requirements, changes made in the Act by the Government, Internal Policies, or otherwise with a view to revise the provisions of this Policy to the extent deemed necessary by the Company from time to time. Any such changes or modifications may be share by the Company to its Employees.



## ANNEXURE I

DO'S	DON'TS
Know Company's Sexual Harassment Policy	Do not indulge in Eve-teasing unwelcome sexual advances or propositions, whether they involve physical touching or not; Comments on personal appearance and individual's body.
If you are being harassed tell the harasser that the abusive behavior is unwelcome and ask the individual(s) to stop. DO keep a record of incidents (date, times, locations, possible witnesses, what happened, your response etc.), such records can strengthen your case and help you remember details over time.	Sexual comments, gestures, and or insulting comments.
Be aware of inappropriate behaviour and refrain from conducting any such acts. Stop others who are found/seen conducting any such acts.	Use of lewd, foul, off-colour, sexually oriented language or "dirty" jokes with sexual implications.
Report Sexual Harassment noticed at the work place to the appropriate Internal Complaints Committee formed under this Policy.	Whistling, touching, and stroking someone's hair, brushing against another's body, pinching, patting, rubbing; grabbing, groping, kissing or fondling another person.
Say "NO" if asked to go to places, do things or participate in situations that make you uncomfortable	The transmission of sexually offensive e-mail, voicemail, or instant or text messages, unwelcome repeated requests for dates or outings.



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Say “NO” to offensive behaviour as soon as it occurs.	Forcible physical touch or molestation and physical confinement against ones will.
BE Honest- When raising an issue, do it honestly without any intention to retaliate/ falsify someone.	Other behaviour or acts that make the workplace intimidating and constitute health and safety problems such as drinking while on duty etc.

**Note: - The list above is not intended to be all-inclusive, and may not cover every possible scenario or situation.**



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### ANNEXURE – 2

#### POSH COMMITTEE MEMBERS

#### JAIDEEP ISPAT & ALLOYS PRIVATE LIMITED

##### Factory:

Name	Designation	Contact No.	Email Id
Deepali Singh	Presiding Officer	8889914382	<a href="mailto:deepali.singh@moira.in">deepali.singh@moira.in</a>
Riddhi Singhanian	Member	9425307028	<a href="mailto:riddhi.s@moira.in">riddhi.s@moira.in</a>
Aroona Acharya	NGO Member	9584052374	<a href="mailto:aroona@abheda.in">aroona@abheda.in</a>
Satyendra Singh	Member	8889914104	<a href="mailto:satyendra.singh@moira.in">satyendra.singh@moira.in</a>
Abhishek Mahajan	Compliance Officer	9522994700	<a href="mailto:abhishek.mahajan@moira.in">abhishek.mahajan@moira.in</a>

##### Head Office :

Name	Designation	Contact No.	Email Id
Deepali Singh	Presiding Officer	8889914382	<a href="mailto:deepali.singh@moira.in">deepali.singh@moira.in</a>
Vaishali Gandhi	Member	8889914228	<a href="mailto:vaishali.jain@moira.in">vaishali.jain@moira.in</a>
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Shubham Jain	Member	8602600134	<a href="mailto:shubhamjain@moira.in">shubhamjain@moira.in</a>
Abhishek Mahajan	Compliance Officer	9522994700	<a href="mailto:abhishek.mahajan@moira.in">abhishek.mahajan@moira.in</a>



## JAIDEEP ISPAT & ALLOYS PRIVATE LIMITED

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### JAIDEEP STEELWORKS INDIA PRIVATE LIMITED

#### Factory:

Name	Designation	Contact No.	Email Id
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Aroona Acharya	NGO Member	9584052374	<a href="mailto:aroona@abheda.in">aroona@abheda.in</a>
Om Prakash Malviya	Member	8889914103	<a href="mailto:malviya@moira.in">malviya@moira.in</a>
Aayushi Godha	Compliance Officer	8889917399	<a href="mailto:aayushi.godha@moira.in">aayushi.godha@moira.in</a>

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Aroona Acharya	NGO Member	9584052374	<a href="mailto:aroona@abheda.in">aroona@abheda.in</a>
Aayushi Godha	Compliance Officer	8889917399	<a href="mailto:aayushi.godha@moira.in">aayushi.godha@moira.in</a>

### ANNEXURE 3

S.NO	ACTION	TIME SCHEDULE	SECTION & RULES
1.	<b>Submission of Complaint</b> by the Complainant (i.e. aggrieved person) to the Internal Committee	Within 3 months of the last incident	Section 9 of the Act
2.	On receipt of the Complaint, the ICC shall send a copy of the same to the Respondent (i.e. the person against whom the complaint is made)	Within a period of 7 working days	Rule 7(2)
3.	Respondent shall file his reply of the Complaint to the ICC along with supporting documents and details of witnesses etc.	Within 10 working days of the date of the receipt of the copy of the Complaint	Rule 7(3)
4.	Conciliation between the parties (i.e. the Complainant and the Respondent), on the request of the Complainant may be provided by the ICC. If the resolution through Conciliation is arrived, the same will be recorded and informed to the Employer. Copies of the settlement is to be provided to both the parties, and no further inquiry will be made.	-	Section 10 of the Act
5.	In case Conciliation is not opted for or if no resolution is arrived at, a formal inquiry will be initiated by the ICC as per Policy/Act.	Inquiry shall be completed within 90 days from the date of initiation.	Section 11 (4) of the Act



## JAIDEEP ISPAT & ALLOYS PRIVATE LIMITED

6.	On the completion of Inquiry , the ICC shall provide a report of its findings to the Employer, for taking recommended action and a copy of the same also be made available to the concerned parties also i.e. Complainant and the Respondent	Within 10 days from the date of completion of inquiry	Section 13 (1) of the Act
7.	The Employer shall act upon the recommendations of the ICC	Within 60 of the receipt of the recommendation of the ICC	Section 13 (4) of the Act
8.	Appeal may be made by either of the party to the Employer, if not satisfied with the inquiry report	Within a period of 90 days of the receipt of the recommendations of the ICC	Section 18 (2) of the Act

**For, Jaideep Ispat And Alloys Private Limited**

**Sd/-**

**Abhishek Mahajan  
Company Secretary  
Mem No. A32961**

**Date : 19.04.2025**

**Place : Indore**