

POLICY ON
**PREVENTION OF
SEXUAL HARASSMENT**

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TRUE NORTH POLICY ON PREVENTION OF SEXUAL HARASSMENT:

1. INTRODUCTION

At True North (the “Firm”), we have zero tolerance for Sexual Harassment. We are committed to providing a safe, collaborative and inclusive environment based on a foundation of fairness and respect for all employees. It understands that equality in employment can be seriously impaired when individuals are subjected to discrimination by way of sexual harassment at workplace. Each such incident results not only in the violation of fundamental rights of “Gender Equality” and the “Right to Life and Liberty” under Articles 14, 15 and 21 of the Constitution of India but also in the violation of Article 19 (1) (g).

With an objective to create a safe and conducive work environment, the Firm has framed a policy (“Policy”) in line with the provisions of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act and Rules, 2013 along with all amendments from time to time (“the Law”). The Firm recognizes that the Law has been passed as a measure to provide equal opportunity to work for its women population and grant them equality under the Constitution of India. However, the Firm also recognizes that other genders aren’t immune to sexual harassment and can experience such behaviours at the workplace. Hence, this Policy shall be applicable to the following for filing complaints:

- a) **Cis-women:** Cis-woman is a person whose gender identity matches with the ‘female’ sex assigned to them at birth.
- b) **Transwomen:** A person who is assigned gender male at birth (PAGMB), but identifies with the gender woman/female. The person may or may not have undergone sex reassignment surgery/procedures.



c) Cis man: A person whose gender identity matches with the 'male' sex assigned to them at birth.

d) Transmen: A person who is assigned gender female at birth (PAGFB), but identifies with the gender man/male. The person may or may not have undergone sex reassignment surgery/procedures).

All complaints filed by Transmen and other Transgender Persons shall be handled in line with provisions of Transgender Persons (Protection of Rights) Act, 2019 & Rules, 2020.

Additionally, it is committed to create an ethos of acceptance and inclusivity such that individuals regardless of their sexual orientation or sexual preferences, individuals belonging to LGBTQIA (Lesbian, Gay, Bisexual, Transgender, Queer, Intersex, and Asexual) community and individuals choosing to not be in any of the socially constructed communities and/or adopting a fluid/non-binary approach, feel respected and accepted at the workplace.

The provisions under this Policy must be adhered to by all Employees as well as Vendors and all other stakeholders that the Firm works with and / or is connected with.

This Policy details the relevant terms and definitions relating to sexual harassment in the workplace; complaint and redressal mechanisms; and relevant guidelines for all employees.



2. DEFINITIONS

2.1 Sexual Harassment - It is an unwelcome inappropriate behaviour (whether directly or by implication) which includes:

- a) Physical contact and advances including touching, deliberately brushing against another person, interference with an individual's normal work movement or assault.
- b) Demand or requests for sexual favours, offensive or unwelcome flirtations, unwanted sexual advances or propositions, threats or suggestive or insulting sounds.
- c) Making sexually coloured remarks containing sexual tones/undertones including repeated sexual innuendoes, sexual epithets, derogatory slurs, sexually explicit jokes.
- d) Showing pornography such as derogatory or sexually explicit posters, cartoons, photographs, magazines, drawings, or other printed items; suggestive objects, pictures; emails, screen savers; or other electronic communications; graphic commentaries and leering or obscene gestures.
- e) Having posters, photographs, paintings, etc. in the background with any sexual context while being on video calls.
- f) The inappropriate behaviours listed above may be committed either verbally or in written form via letters, video calls/audio calls, phone calls, texts, e-mails, on any social media platform or through any other electronic communication.
- g) Any other unwelcome visual, verbal, or physical conduct of a sexual nature.

These circumstances, among other circumstances, if it occurs or if it is present in relation to or connected with any act of sexual harassment, a.may amount to sexual harassment:

- a) When either implicitly or explicitly it becomes a condition of the individual's present or future employment.
- b) b) Implied or explicit promise of preferential treatment in employment
- c) Implied or explicit threat of detrimental treatment in employment.
- d) The harassment has a purpose or effect of unreasonably interfering with the work performance or creating an environment, which is intimidating, hostile or offensive.
- e) Humiliating treatment likely to affect health or safety.

2.2. Aggrieved Individual: Anyone, of any age or gender whether employed or not, who alleges to have been subjected to any act of sexual harassment by the respondent.

2.3. Complainant - means any person who may file a complaint on behalf of the Aggrieved Individual in case of mental or physical incapacity. Any reference to the term 'Complainant' throughout this Policy shall mean reference to 'Aggrieved Individual' and / or the 'Complainant' as applicable.

2.4. "Employee" means a person employed at the Firm for any work on regular, temporary, ad hoc or daily wage basis, either directly or through an agent, including a contractor with or, without knowledge of the principal employer, whether for remuneration or not, or working on a voluntary basis or otherwise, whether terms of employment are expressed or implied and includes a co-worker, a contract worker, probationer, trainee, apprentice or called by any other such name.

2.5. "Internal Committee" or "IC" means the committee constituted by the Firm to investigate complaints of sexual harassment, in the manner prescribed under the law and as set out in this Policy.

2.6. “Management” means the Managing Partner of the Firm.

2.7. “Respondent” means a person against whom a complaint of Sexual Harassment as set out in this policy has been made.

2.8 “Workplace” includes any place visited by an Employee arising out of or during the course of the employment including transportation provided by the firm and outstation stay for work related purposes. It does not only include physical workspaces but also spaces from where work is carried out remotely or virtually. For example:

- a) All offices or other premises where the Firm’s business is conducted.
- b) All Firm related activities performed at any physical or virtual site.
- c) Any social, business or other functions taking place physically or virtually where the conduct or comments may have an adverse impact on the workplace or workplace relations.
- d) Any alleged act of sexual harassment committed during or outside of office hours using any mode of communication including video calls/audio calls, phone calls, text, e-mails, on any social media platform or through any other electronic communication etc.
- e) Any sexual harassment on any social networking website during or outside of office hours
- f) Any place visited by Employee or arising out of or during the course of employment with Firm, including transport services provided by Firm for undertaking such journey, audio/video conferencing applications or any other communication related tools/applications. For example, Employees who are on overseas programs and trainings in course of their employment with the Firm.

2.9. “Visitor” or “Third Party” includes any person who is visiting the Workplace and is not covered by any of the other categories defined by

this Policy. For example, guests coming for physical/online interviews, meetings, events, programs or people walking in for meeting existing employees, etc.



3. INTERNAL COMMITTEE (IC)

The Firm has constituted an IC for the redressal of Sexual Harassment complaints and for ensuring time-bound treatment of such complaints.

The IC will comprise the following four members:

- The Presiding Officer, who shall be a senior woman executive of the Firm.
- At least 2 other employees from the Firm who are preferably committed to the cause of women or who have had experience in social work or have legal knowledge in this field. These members shall automatically vacate office upon ceasing to be Employee of the firm.
- One external member, familiar with issues relating to Sexual Harassment.

At least one half of the total IC members shall be women.

The tenure of the IC members shall be 3 years from the date their appointment as IC members.

The current members of the IC are listed in **Annexure A**. The guidelines for the IC are detailed in **Annexure C** of this Policy.

An IC member shall be removed / replaced in the event that the IC member:

- (i) Breaches confidentiality
- (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 them.
- (iii) has been found guilty in any disciplinary proceedings or a disciplinary proceeding is pending against them.
- (iv) has abused their position as to render their continuance in office prejudicial to the public interest.

Any vacancy created in the IC due to cessation of employment, resignation, death, disability, or removal, as applicable, shall be filled by a fresh nomination by Firm in accordance with its guidelines and in conjunction with provision of Law (where applicable).





4. WHAT IF THE AGGRIEVED INDIVIDUAL IS UNABLE TO MAKE A COMPLAINT?

- i) Where the Aggrieved Individual is unable to make a complaint on account of their physical incapacity, a complaint may be filed by-
 - Their relative or friend; or
 - Their 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 Individual.
- ii) Where the Aggrieved Individual is unable to make a complaint on account of their mental incapacity, a complaint may be filed by-
 - Their relative of friend; or
 - A special educator; or
 - A qualified psychiatrist or psychologist; or
 - The guardian or authority under whose care they are receiving treatment or care; or
 - Any person who has knowledge of the incident jointly with their relative or friend or a special educator or qualified psychiatrist or psychologist, or guardian or authority under whose care they are receiving treatment or care.
- iii) Where the Aggrieved Individual 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 their written consent.
- iv) Where the Aggrieved Individual is dead, a complaint may be filed by any person who has knowledge of the incident, with the written consent of their legal heir.

5. COMPLAINT PROCESS

Any Aggrieved Individual may submit a complaint of Sexual Harassment to any member of the IC in writing or over email at the earliest, but no later than 3 months from the date of occurrence of an incident of Sexual Harassment, or, in case of a series of such incidents, 3 months from the date of the last such incident. The period of 3 months for filing a complaint may be extended by the IC by another 3 months, for reasons recorded in writing. Provided that where the Aggrieved Individual cannot make such complaint in writing, the Presiding Officer or any member of the IC shall render all reasonable assistance to the Aggrieved Individual for making the complaint in writing.

At the time of filing the complaint, the Aggrieved Individual shall submit to the IC six copies of the complaint and the following need to be kept in mind:

- a) The complaint has to be in writing.
- b) The Complainant should provide (if possible) as many specific details as possible including incidents, dates and people that are involved in their complaint.

Details with respect to the following may be provided while filing a complaint:

- i) The alleged event, matter or issue that is subject to the complaint (time/date/place etc.)
- ii) The name and details of the Respondent against whom the complaint is being filed.
- iii) Names and addresses of the witnesses (if any)
- iv) Details of documentary evidence (if any) such as WhatsApp chat records, SMS, E-mails, CCTV Footage, Audio / Video recording etc. and

- v) Any additional information, documentation, or other evidence available to support the complaint (if any)

The complaint can also be submitted electronically at **posh@truenorth.co.in** to the IC.

The Firm understands that many incidents of Sexual Harassment may not have any evidence or witnesses to support the complaint, and the Firm encourages any Aggrieved Individuals who do not have any evidence or witnesses to approach the IC nevertheless.



6. WHAT IF COMPLAINT IS AGAINST SOMEONE WHO IS NOT AN EMPLOYEE OF THE FIRM?

If any Employee/Third Party is sexually harassed by any external party who is not an Employee of the firm, either in Firm premises or in that external party's premises, then IC shall contact either the internal committee of that external party and / or the Police (as the case may be), on the written complaint of such Employee/Third Party to the Firm's IC and on their request that such complaint be transferred to other IC and address the matter to satisfactory closure. Alternatively, Employee/Third Party may choose to reach out directly to IC of that external party and / or Police (as the case may be) and the Firm will offer assistance on written request by Employee/Third Party.

7. PROCESS FOR HANDLING COMPLAINTS BY IC



The IC will forward a copy of the complaint filed by the Aggrieved Individual to the Respondent within 7 working days of its receipt and provide an appropriate time (not exceeding 10 working days from the date on which the IC receives the complaint documents) to the Respondent to respond in writing to the allegations in the complaint. The Respondent may attach documentary evidence and a list of witnesses to the incident(s), if applicable, to their response.

7.1. CONCILIATION PROCESS

Prior to initiating an inquiry into the complaint, the IC may, at the request of the Aggrieved Individual, take steps to settle the matter between the Aggrieved Individual and the Respondent through conciliation, provided that no monetary settlement shall be made as a basis of conciliation.

If a settlement is reached between the Aggrieved Individual and the Respondent, the IC shall record the settlement so arrived and forward the same to the Management and no further enquiry shall be carried out by the IC. The IC will also provide copies of the settlement as recorded to the Complainant and the Respondent. If Complainant feels that the terms of Settlement are not being complied with by the Respondent or action has not been taken by firm, Complainant can make a written complaint to the IC to conduct an inquiry into the complaint.



7.2. PROCEDURE FOR INQUIRY

The IC shall, where the Respondent is an Employee, initiate inquiry in the following cases:

- Where no conciliation is requested by the Aggrieved Individual.
- Where conciliation has not resulted in any settlement; or
- Where the settlement has been agreed to, and the Aggrieved Individual informs the IC that the Respondent has breached any term or condition of the settlement.

The following need to be kept in mind with respect to inquiry:

- i) If the Complainant or the Respondent desires any witness/es to be called, they shall communicate in writing to IC the names of witness/es whom they propose to call.
- ii) If the Complainant desires to tender any documents by way of evidence before the IC, they shall supply copies of such documents. Similarly, if the Respondent desires to tender any documents in evidence before IC they shall supply copies of such documents. Both shall affix their signature on the respective documents to certify these to be authentic documents.
- iii) A quorum of 3 members, including the Presiding Officer and the external member, must be present for the inquiry proceedings to take place.
- iv) The IC shall interview the Aggrieved Individual, Respondent and relevant witnesses, if any, as part of its inquiry process and shall conduct a free and fair inquiry into the complaint following the principles of natural justice; and shall complete the inquiry into the complaint within 90 days including all confidential interviews and examination of evidence.
- v) 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 IC.
- vi) The IC shall have the powers to summon and enforce the attendance of any person and conduct an examination, request the discovery and production of documents and / or any other matter which may be necessary for the inquiry process. Any refusal by any Employee of Firm to attend any hearing before the IC when summoned or to provide to the IC, any documents and / or information within their power or possession shall constitute as misconduct, rendering such Employee for adverse action by Firm.
- vii) IC shall notify in writing, the time and dates of its meetings to the Complainant, the Respondent and witnesses.
- viii) All inquiry proceedings will be documented in detail and treated as strictly confidential with restricted viewing only on need-to-know basis.
- ix) Inquiry proceedings shall be minuted / recorded in writing. They may be audio recorded as well (where possible). The minutes / transcribed record of the proceedings and the statement of witnesses shall be endorsed by the persons concerned and IC in token of authenticity thereof.
- x) All colleagues and witnesses who are part of the IC proceedings will need to sign a confidentiality declaration.



8. ACTION DURING PENDENCY OF AN INQUIRY

Upon the Aggrieved Individual's written request, the IC may, at its sole discretion, grant any one or more of the following interim reliefs during the pendency of the inquiry:

- Allow the Aggrieved Individual or the Respondent to work from home.
- Grant paid leave to the Aggrieved Individual, for a period up to 3 months. The leave so granted shall be in addition to the leave that the Aggrieved Individual may otherwise be entitled to.
- Send the Respondent on unpaid leave during the pendency of inquiry.
- Restrain the Respondent from reporting on the Aggrieved Individual's work performance or writing their confidential report and assign the same to another person.
- In case the complaint has been filed by an intern or an apprentice working under the Respondent, restrain the Respondent from supervising any official / academic activity of the Complainant and assign the same to another Employee.
- Direct the Respondent to not communicate with the Complainant in any manner including any mode of electronic communication such as text messages, emails, video/audio calls, on any social media platform or via any other mode of electronic communication.
- In case complaint is filed by a Complainant, the same benefits as above would apply, depending on facts and circumstances.

In case Respondent is a Visitor / Third Party, any one or more of the following may be recommended: If the Respondent is a Visitor / Third Party adequate steps to ensure that they do not enter Firm premises or

contact/threaten Complainant/Witnesses directly or indirectly using any mode of communication. IC to suggest appropriate disciplinary action by the concerned authority including reaching out to the Police if required with consent of Complainant.



9. INQUIRY REPORT AND WHAT ACTIONS CAN BE SUGGESTED UNDER IT

Within 10 days of completion of the inquiry, the IC shall submit a report of its findings and recommendations (“Report”) to the Management.

Where the IC arrives at a conclusion that the allegation against the Respondent has not been proved, it shall recommend to the Management that no action be taken in the matter.

Where the IC finds the Respondent to be guilty of Sexual Harassment, it shall recommend any of the following actions depending on the severity, frequency and impact of the Sexual Harassment:

- Written apology.
- Written warning.
- Reprimand or censure.
- Counselling.
- Withholding of promotion.
- Withholding of increment/ bonus; or
- Termination.
- Carrying out community service
- The IC may also award compensation to the Aggrieved Individual to be paid by the Respondent found guilty of Sexual Harassment after considering the following factors:
 - Any mental trauma, pain, suffering and emotional distress caused to the Aggrieved Individual.
 - Any loss in the career opportunity due to Sexual Harassment.

- Medical expenses incurred by the Aggrieved Individual for physical or psychiatric treatment.
- The income and financial status of the Respondent; and
- The feasibility of such payment in lump sum or in instalments.
- If the IC concludes that the complaint does not relate to an incident/s of Sexual Harassment, it shall conclude the inquiry after recording the reasons and the complaint shall then be forwarded to the Human Resources, if required.

Where the Respondent is a Third Party, IC may recommend any one or more of the following:

- Warning to employing Organization/association/firm (if any)
- Declaring the Firm out of bounds to the Respondent
- Withdrawal of the right to provide services to Firm for a certain period (if applicable)
- Helping the Complainant in filing an FIR, should they desire
- Debarring/blacklisting such person from Firm
- Other similar or appropriate punishment

Firm shall act upon the recommendation given by IC within 60 (sixty) days of receipt of the recommendation.

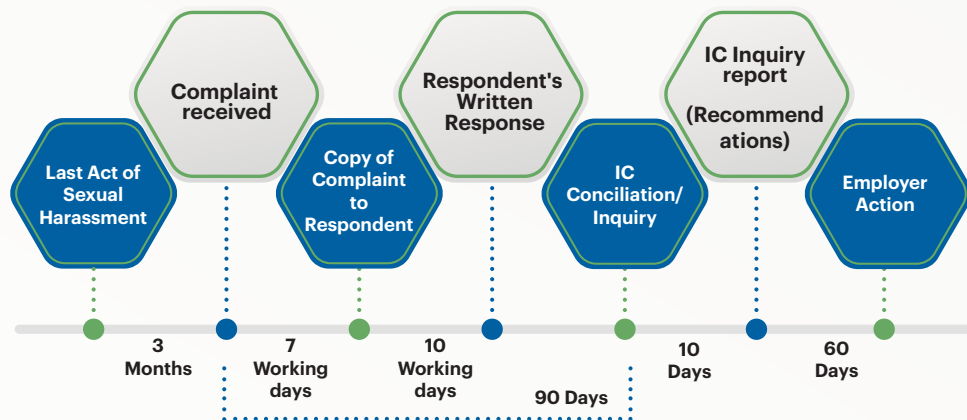


10. APPEAL

In case the inquiry process is conducted by the IC and the Complainant is a Cis-woman or Transwoman, either party aggrieved (Complainant or Respondent) by the recommendations of the IC and / or non-implementation of recommendations may file an appeal to the Appellate Authority as per service rules and/or as per other provisions of Law within 90 (ninety) days of the recommendations.

By way of this Policy, as a healthy practice and as part of internal policies, in case the Complainant is a Cis-man, either party aggrieved (Complainant or Respondent) by the recommendations of the IC and / or non-implementation of recommendations can get in touch with the Managing Partner of the Firm who will review the appeal.

In case the Complainant is a Transman or any other Transgender Person, appeals would lie as per provisions of Transgender Persons (Protection of Rights) Act, 2019 and Rules, 2020 and / or other internal policies as may become applicable from time to time.



11. MALICIOUS COMPLAINT

In case IC arrives at a conclusion that:

- Allegation against the Respondent is malicious or was made with malicious intent or
- Complaint was made with the motive of maligning the Respondent / tarnishing their image or
- Complaint was made to settle personal / professional scores or
- Complainant has made the complaint knowing it to be false or
- Has produced a forged or misleading document.

IC shall recommend strict action against the Complainant. IC may recommend the Firm to take an action that would have been applicable to the Respondent if the complaint had been genuine. In this regard, IC may recommend any of the actions specified above (As applicable).

A mere inability to substantiate a complaint or provide adequate proof need not attract action against the Aggrieved Individual under this section.



12. TERMINATION OF INQUIRY

The IC shall have the right to terminate the inquiry proceedings or to give an ex-parte decision on the complaint, if the Aggrieved Individual or Respondent fails, without sufficient cause, to present themselves for three consecutive hearings convened by the Presiding Officer. Provided that such termination or ex-parte order may not be passed without giving notice in writing, fifteen days in advance, to the party concerned.



13. RETALIATION

This policy recognizes retribution or retaliation in the context of reporting acts of Sexual Harassment as a serious violation. Regardless of the outcome of any complaint made in good faith, the Aggrieved Individual lodging the complaint and any person providing information or any witness, will be protected from any form of retaliation. The report and investigation of allegations of retaliation will follow the procedures set forth in this Policy and will be treated as an additional complaint and inquired into similarly. The Firm shall have the authority, in its discretion, to impose severe disciplinary actions on any person who is found to have retaliated against an individual for reporting Sexual Harassment, or for participating in an investigation of allegations of such conduct.



14. CONFIDENTIALITY

All discussions / decisions pertaining to an incident of sexual harassment must be kept confidential. Therefore, contents of the comments made, the identity and addresses of the Complainant, Respondent and witnesses, any information relating to conciliation and inquiry proceedings, inquiry report including recommendations of the IC and action taken on the Respondent shall not be published,

communicated or made known to the public, press and media in any manner. However, information may be disseminated regarding the justice secured to any victim without disclosing the name, address, identity or any other particulars calculated to lead to the identification of the Complainant and witnesses.

Appropriate information will be shared with Government authorities as per the Act. If any person breaches confidentiality, they shall be liable for penalty as per service rules and / or Law. Firm shall recover a sum of rupees five thousand (5,000) as penalty from such person and may take any other action as it may deem fit.



15. FILING OF COMPLAINT WITH POLICE

Nothing in these rules and procedures shall preclude anybody from simultaneously lodging a complaint with the police in respect of any act amounting to an offence under the law. Firm will provide assistance in this regard, if assistance is sought. This Policy is not intended to impair or limit the right of any Employee seeking a remedy available under any law. Proceedings under this Policy shall continue notwithstanding any proceedings initiated by a Complainant (as defined hereinafter) against Respondent under any law in force.

16. RESPONSIBILITIES OF EMPLOYEES

The Firm expects all its employees to comply with this Policy towards creating a respectful and dignified work environment for all. We must:

- Familiarize ourselves completely with the content of this Policy.
- Cooperate with any measures introduced to promote equal opportunities.
- Make sure we understand and respect the sensitivities of co-workers and other people in the workplace.
- Refrain from discriminatory, offensive or disrespectful behaviour, or any behaviour which is in contradiction to the letter or the spirit of this policy.
- Make sure we extend support to any person who we suspect is being sexually harassed.
- Report instances of Sexual Harassment and retaliation without fear.
- Maintain confidentiality regarding any aspect of a complaint or an inquiry about which we may have information or may be included.

Some frequently asked questions have been listed in **Annexure B** for a better understanding of the Policy.

17. RESPONSIBILITIES OF FIRM

- a) Firm will not tolerate any act of sexual harassment. It shall treat sexual harassment as 'Misconduct' and take prompt, appropriate action for the same.
- b) It will organize gender-sensitization workshops and awareness programs at regular intervals covering all locations.
- c) Shall raise awareness about the prevention of sexual harassment through informative posters.
- d) To sensitize managers to conduct calls/meetings during working hours as

much as possible, and to not insist on any employee/team member to attend video calls, where not necessary and/or if they express difficulty in joining via video call.

- e) It will ensure that necessary facilities and information are provided to the IC including technical support for dealing with the complaint and conducting an inquiry.
- f) Assist in securing the attendance of Respondent and witnesses before the IC and make available such information to the IC as it may require with regards to the complaint.
- g) Provide assistance to the IC in any manner feasible to conduct a fair and expeditious inquiry and implement recommendations made by IC.
- h) Provide assistance to the Complainant if the Complainant chooses to file a complaint in relation to the offence under the Indian Penal Code.
- i) Cause to initiate action, under the Indian Penal Code, against the Respondent, or if the Complainant so desires, where the Respondent is not an employee, in the workplace at which the incident of sexual harassment took place.
- j) Offer counselling sessions to anyone impacted by incident of sexual harassment.
- k) Do all other things it may deem fit for successful implementation of this Policy.

18. POLICY IMPLEMENTATION AND REVIEW

This Policy will be implemented and reviewed by the Firm on a need basis. The Firm reserves the right to amend, abrogate, modify, rescind, reinstate the entire Policy or any part of it at any time.

ANNEXURE A

MEMBERS OF INTERNAL COMMITTEE

Name	Designation	Role in IC	Contact Coordinates
Paras Nayyar	Chief Financial Officer	Presiding Officer	paras@truenorth.co.in
Joylyn Largo-Afonso	Director - HR	Member	joylyn@truenorth.co.in
Srikrishna Dwaram	Partner	Member	srikrishna@truenorth.co.in
Shreya Kanaujia	—	External Member	shreya.k@equilibrioadvisory.org

ANNEXURE B

FREQUENTLY ASKED QUESTIONS

What should I do if I think I am being sexually harassed?

Please let an IC member know right away and file a complaint with them over email. Unfortunately, ignoring sexual harassment does not make it go away.

What should I do if I feel I have been discriminated against or harassed, but I don't think it is sexual harassment?

Please let your supervisor or human resources know right away. The Firm prohibits discrimination or harassment on the basis of race, colour, religion, sex, sexual orientation, gender identity, gender expression, marital status, age, disability, nationality or background.

I'm being harassed by someone who is not an employee, but who visits the Firm to conduct business. Is there anything I can do?

Yes, you can report the issue as Sexual Harassment. The policy applies to the extended workplace, as well as situations involving an external stakeholder.

Will my complaint be treated confidentially?

The Firm will make every effort to handle inquiries, complaints and related proceedings in a manner that protects the privacy of all parties. Each situation is resolved as discreetly as possible, and information is shared only with those who need to know such information in order to investigate and resolve the matter. The Firm will be sensitive to the feelings and situation of the alleged victim and anyone who reports sexual harassment. However, the Firm will need to address the issue and try and get as much information as possible while keeping the information confidential. All employees are also required to follow confidentiality.

ANNEXURE C

IC GUIDELINES

All IC members must consider the prevention of Sexual Harassment in the workplace as their responsibility and obligation; and must proactively initiate measures to achieve the same, including communicating to employees, and sensitizing and educating them through periodic trainings. In addition, they must:

- Familiarize themselves with the details of the Act, and its rules; and any other amendments or notifications that may be made.
- Meet regularly to update themselves on and review the details of any complaints that may have been made, and inquiries conducted.
- Be responsible for submitting an annual report on all complaints of this nature to both the Management and the District Officer notified under the Act, in the manner prescribed.
- Keep in mind the covert and insidious nature of Sexual Harassment, and stay sensitive to the practical and societal difficulties in reporting such acts; and
- Be sensitive to the difficulties in providing direct or corroborative evidence of such incidents.
- Further, while conducting an investigation, IC members shall follow their own code of conduct, and they shall:
 - Be cognizant of the implicit and explicit power equations between all parties, including organizational hierarchy and influence as well as relative socio-economic differences, while evaluating testimonies and evidence.
 - Not conduct any inquiry or allow any evidence about the
 - Aggrieved Individual's personality, character, personal life, general behaviour or personal and sexual history.
 - Guard against any bias in their own perception or investigation.
 - Keep both parties reasonably informed at their discretion about the status of the complaint and inquiry.
 - Stay impartial to both parties, and follow the principles of natural justice in their inquiries; and
 - Evaluate all testimonies and evidence applying a balance of probabilities.