



CHETANA EDUCATION LIMITED

CIN: U58111MH2024PLC417778

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PREVENTION OF SEXUAL HARASSMENT (POSH) “POLICY”

In accordance with the provision of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013.

I. Policy Objective:

To foster a professional, open, and trusting workplace by protecting all Employees from physical and mental abuse and/or harassment.

II. Scope:

Chetana Education Limited Liability Partnership (“**Organisation/LLP/Chetana**”) aims to adopt zero tolerance attitudes against any kind of Sexual Harassment or discrimination caused by any employee during their tenure in the organisation towards any other person being an employee, Client, Vendor and/or Contractor of Chetana whether within the premises or elsewhere in India.

III. Applicability:

The Policy applies to all the Employees of Chetana at all Locations.

IV. Definition:

- **Employee of Company/LLP:** Includes person carrying out any work on behalf of Organisation and may have been hired as Permanent, Temporary, Contracted or on Retainership Basis, part-time basis etc. either directly or indirectly or through vendor organization.
- **Sexual Harassment:** Harassment of a Female/Male employee consisting of any unwelcome sexually determined behaviour, whether directly, indirectly, by any male/female in charge of the management or a male/female co-employee either individually or in association with other persons to exploit the sexuality of co-employee to harass him/her in manner which prevents or impairs his/her full utilization of full benefits, facilities or opportunities or any other behaviour which is generally considered to be derogatory.
- **Aggrieved Women:** In relation to 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.
- **Respondent:** Employee/Employees against whom the complaint has been filed.

V. Policy Guidelines:

Sexual Harassment shall include but not limit to: -

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

Inappropriate conduct could also be a joke, a prank or even a compliment. These gestures also lead to harassment although the intention of the individual might not be to offend the other person.

VI. Forms of workplace sexual harassment:

Generally, workplace sexual harassment refers to two common forms of inappropriate behaviour:

- Quid Pro Quo (literally “this for that”) - Implied or explicit promise of preferential/detrimental treatment in employment - Implied or express threat about her present or future employment status
- Hostile Work Environment - Creating a hostile, intimidating or an offensive work environment - Humiliating treatment likely to affect her health or safety.

VII. Grievance Mechanism: Procedure to Register Complaints:

A complaint shall be submitted in writing to any member of the Internal Complaint Committee mentioned herein within 3 months of occurrence of an act of Sexual Harassment. If the respondent is direct supervisor of the Complainant, or person influencing the career growth of the Complainant, the reporting structure will be changed till the time the enquiry is completed.

VIII. Internal Complaint Committee (“ICC”):

- a) Each Complaint of Sexual Harassment shall be dealt with utmost confidentiality and urgency by an ICC consisting of:
 - i. Presiding Officer
 - ii. One Member
 - iii. One Lady Member
 - iv. One Lady External Member
- b) Within 3 working days, the ICC shall commence official internal enquiry by:
 - i. By informing the said complaint to the respondent.
 - ii. By instructing to stop the alleged act of Sexual Harassment immediately
 - iii. By informing not to reach out to the complainant directly or indirectly
 - iii. By asking an immediate explanation from him/her to the same
- c) Within 5 working days from the receipt of original complaint, the designated person shall respond in writing to the complainant informing him/her about the initial steps taken by the Organisation in order to stop the alleged act(s)
- d) Within 15 days from receipt of the original complaint, the ICC shall record and accordingly communicate in writing to the Complainant and the Respondent, its prima facie findings, upon giving the concerned parties a fair and due opportunity to represent themselves and upon conducting fact finding, truth verification and counselling sessions with persons involved in alleged act(s).

- e) Complaint will be closed no later than one month from receipt of original Complaint by recording the decisions of the ICC, accordingly, informing to the complainant and the Respondent of the same.
- f) Employees are duty bound to assist in investigative steps, employees' wholehearted participation shall be mandatory in this regard. Whistle-blowers shall be protected from exposure, retaliation, or hostility.
- g) Within 2 working days from receipt of prima facie findings or the charges, if the complainant or the Respondent is dissatisfied with the decision of internal committee, she or he may appeal specifying the reasons in writing to Managing Director. Within 5 working days from the receipt, the appeal shall be finally disposed of by written communication to the said party. The decision of Managing Director shall be final and cannot be appealed.

IX. REDRESSAL:

- An amicable resolution of the complaint is possible only with the written consent of the Complainant.
- Within 24 hours of closing the case file, ICC shall present the same to and inform its decision to the Managing Director.
- In case of decision establishing the offence of Sexual Harassment of the Complainant, within 3 working days, the ICC shall recommend disciplinary action against the offender considering the nature and extent of injury caused to the Complainant, prior complaints, or repetition of offence etc. and the impact of the offence on the Organisation profile as a whole.
- The position of the offender and the criticality of the position occupied by the offender shall not be any hindrance to the disciplinary action taken against the offender.
- The disciplinary action that shall be commensurate with the nature of the gravity of the offence, shall include but not limited to: -
 - Warning
 - Written apology from offender,
 - Bond of good behaviour
 - Transfer
 - Debarring from supervisory duties
 - Denial of employee benefits like increments/promotion/salary correction etc.
 - Cancellation of specific work Assignment
 - Suspension
 - Dismissal

X. CONFIDENTIALITY:

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

XI. ACCESS TO REPORTS AND DOCUMENTS:

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

XII. PROTECTION TO COMPLAINANT / VICTIM:

Chetana is committed towards ensuring that no employee who brings forward a harassment concern is subject to any form of reprisal. Any reprisal will be subject to disciplinary action. Chetana will ensure that the victim or witnesses are not victimized or discriminated against while dealing with complaints of sexual harassment. However, anyone who abuses the procedure (for example, by maliciously putting an allegation knowing it to be untrue) will be subject to disciplinary action.

XIII. PENAL PUNISHMENT PROVISIONS:

A new section 354A was added to the Indian Penal Code, 1860 through the Criminal Law (Amendment) Act, 2013, which enlists the acts which constitute the offence of sexual harassment and further envisages penalty / punishment for such acts. A man committing an offence under this section is punishable with imprisonment, the term of which may range between 1 - 3 years or with fine or both. Since the amendment criminalizes all acts of sexual harassment, employers shall be required to report any offences of sexual harassment to the appropriate authorities.

XIV. CONCLUSION:

In conclusion, Chetana reiterates its commitment to providing its employees, a workplace free from harassment/ discrimination and where every employee is treated with dignity and respect.

Composition of Internal Complaint Committee

*In accordance with the provision of the Sexual Harassment of Women at Workplace
(Prevention, Prohibition and Redressal) Act, 2013.*

Sr. No.	Name	Designation	Extension No.
1	Ms. Darshana Ashutosh Dabke	Presiding Officer	6049
2.	Ms. Shanti Nandkishore Kamerkar	Member	6131
3.	Mr. Jayesh Rajendraprasad Walke	Member	6056
4.	Ms. Geeta Thakkar	External Member	+91 7977835458