



MAHALAKSHMI DEALCOM PVT LTD

I. Purpose

It is the policy of the Company to provide an environment free from harassment for any reason, whether because of age, race, color, religion, gender, creed, national origin, disability, or any other factor, especially sex. Sexual harassment violates an individual's fundamental rights and personal dignity, is unlawful, and will not be tolerated by the Company. The Company considers sexual harassment in all its forms to be a serious offense.

II. Definition

Sexual harassment is unwanted sexual attention of a persistent or offensive nature made by a person who knows, or reasonably should know, that such attention is unwanted. Sexual harassment includes sexually oriented conduct that interferes with an employee's job performance and creates an intimidating, hostile, or offensive working environment. While sexual harassment encompasses a wide range of conduct, some examples of specifically prohibited conduct include:

- Promising, directly or indirectly, an employee a reward if the employee complies with a sexually oriented request;
- Threatening, directly or indirectly, to retaliate against an employee if the employee refuses to comply with a sexually oriented request;
- Denying, directly or indirectly, an employee an employment-related opportunity if the employee refuses to comply with a sexually oriented request;
- Engaging in sexually suggestive physical contact or touching another employee in a way that is unwelcome;
- Making sexual or romantic advances toward an employee and persisting despite the employee's rejection of the advances;

Head Office: : 701, 7th Floor, Nile Complex, Old HB Road, Ranchi 834001, Jharkharnd (India)

Registered Office: : 5A, Shantinike- tan Apartment, Kaikhali Main Road, PO - Airport, Kolkata 52 (India)



CIN : U51109WB2007PTC118668
Web: www.themahalakshmi.com
Phone: +91 651 3501035; Email: contact@themahalakshmi.com
ISO 9001:2015 & ISO 22000:2015 Certified
Member:



MAHALAKSHMI DEALCOM PVT LTD

- Deliberately creating an overall offensive environment, including use of vulgar language, displaying, storing, or transmitting sexually explicit photographs or other materials, and the telling of sexual stories.

Sexual harassment can be physical and/or psychological in nature. An aggregation of a series of incidents can constitute sexual harassment even if one of the incidents considered on its own would not be harassing.

Employees are prohibited from harassing other employees whether or not the incidents of harassment occur on Company property and whether or not the incidents occur during working hours.

Sexual harassment can involve males or females being harassed by members of either sex. Although sexual harassment typically involves a person in a greater position of authority as the harasser, individuals in positions of lesser or equal authority also can be found responsible for engaging in prohibited harassment.

Consensual sexual or romantic relationships between employees are deemed unwise and are strongly discouraged if one employee has supervisory authority over the other employee.

III. Responsibilities

Company Responsibility

Company strive to keep its employees and associates informed all its employees and associates about the policy, including any changes from time to time. The following tools to be adopted by the company to ensure the same

- Explaining the policy at the time of induction of staff and all associates in the company



MAHALAKSHMI DEALCOM PVT LTD

- Circulating the policy in public domain, like website and authorised users given access to the document.
- Circulation of the policy through the Social media platforms.
- Circulating the policy through mail etc.

If employees believe that they have been subject to sexual harassment or any unwanted sexual attention by anyone (e.g., a coworker or other person), they should:

1. Make their unease and/or disapproval directly and immediately known to the alleged harasser;
2. Complete an Incident Report form; and
3. Report the incident immediately to the Director. If that individual is responsible for the harassment, report the conduct to the Assistant Director or any assigned Trustees by the Company..

Employees should feel free to raise concerns and make reports without fear of reprimand. It is unlawful to retaliate against an employee for filing a complaint of sexual harassment or for cooperating in an investigation of a sexual harassment complaint. All incidents of sexual harassment or inappropriate sexual conduct must be reported regardless of their seriousness. Alleging harassment without following these procedures might be considered evidence of a malicious intent on the part of the complainant.

IV. COMPLAINT MECHANISM:

An appropriate complaint mechanism in the form of “Complaints Committee” has been created in the Company for time-bound redressal of the complaint made by the victim.

V. COMPLAINTS COMMITTEE:



MAHALAKSHMI DEALCOM PVT LTD

The Company has instituted a Complaints Committee for redressal of sexual harassment complaint (made by the victim) and for ensuring time bound treatment of such complaints. Initially, and till further notice, the Complaints Committee will comprise of the following four members out of which at least one members will be of the same gender as that of the complainant:

1. Director of the company or any person authorized by directors.
2. Head- HR (Presiding Officer)
3. Departmental head from where the complaint has originated (Member)
4. One of the Employee of the company (Member)

The Complaints Committee is responsible for:

- Investigating every formal written complaint of sexual harassment
- Taking appropriate remedial measures to respond to any substantiated allegations of sexual harassment
- Discouraging and preventing employment-related sexual harassment

VI. PROCEDURES FOR RESOLUTION, SETTLEMENT OR PROSECUTION OF ACTS OF SEXUAL HARASSMENT:

The Company is committed to providing a supportive environment to resolve concerns of sexual harassment as under:



MAHALAKSHMI DEALCOM PVT LTD

A. Informal Resolution Options

When an incident of sexual harassment occurs, the victim of such conduct can communicate their disapproval and objections immediately to the harasser and request the harasser to behave decently. If the harassment does not stop or if victim is not comfortable with addressing the harasser directly, the victim can bring their concern to the attention of the Complaints Committee for redressal of their grievances. The Complaints Committee will thereafter provide advice or extend support as requested and will undertake prompt investigation to resolve the matter.

B. Complaints:

1. An employee with a harassment concern, who is not comfortable with the informal resolution options or has exhausted such options, may make a formal complaint to the Presiding Officer of the Complaints Committee constituted by the Management. The complaint shall have to be in writing and can be in form of a letter, preferably within 15 days from the date of occurrence of the alleged incident, sent in a sealed envelope. Alternately, the employee can send complaint through an email. The employee is required to disclose their name, department, division and location they are working in, to enable the Presiding Officer to contact them and take the matter forward.

2. The Presiding Officer of the Complaints Committee will proceed to determine whether the allegations (assuming them to be true only for the purpose of this determination) made in the complaint fall under the purview of Sexual Harassment, preferably within 30 days from receipt of the complaint.

In the event, the allegation does not fall under the purview of Sexual Harassment or the allegation does not constitute an offence of Sexual Harassment, the Presiding Officer will record this finding with reasons and communicate the same to the complainant. :



MAHALAKSHMI DEALCOM PVT LTD

3.If the Presiding Officer of the Complaints Committee determines that the allegations constitute an act of sexual harassment, he/ she will proceed to investigate the allegation with the assistance of the Complaints Committee.

4. Where such conduct, on the part of the accused, amounts to a specific offence under the law, the Company shall initiate appropriate action in accordance with law by making a complaint with the appropriate authority.

5. The Complaints Committee shall conduct such investigations in a timely manner and shall submit a written report containing the findings and recommendations to the Director or any authorized persons as soon as practically possible and in any case, not later than 90 days from the date of receipt of the complaint. The Director or any authorized person will ensure corrective action on the recommendations of the Complaints Committee and keep the complainant informed of the same.

Corrective action may include any of the following:

- a. Formal apology.
- b. Counseling.
- c. Written warning to the perpetrator and a copy of it maintained in the employee's file.
- d. Change of work assignment / transfer for either the perpetrator or the victim.
- e. Suspension or termination of services of the employee found guilty of the offence and followed by legal proceedings.

6. In case the complaint is found to be false, the Complainant shall, if deem fit, be liable for appropriate disciplinary action by the Management.

VI. CONFIDENTIALITY:

The Company 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



MAHALAKSHMI DEALCOM PVT LTD

INDIGO CATERING & SERVICES PVT.LTD.

Sexual Harassment Policy

the investigatory process to the extent practicable and appropriate under the circumstances.

VII 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 Company except where disclosure is required under disciplinary or other remedial processes.

VIII. PROTECTION TO COMPLAINANT / VICTIM:

The Company is committed to 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. The Company 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.

IX. CONCLUSION:

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