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POLICY ON PREVENTION OF SEXUAL HARASSMENT AT THE WORKPLACE

(Approved by Board of Directors in its meeting held on 11.01.2024)

1. DEFINITIONS:

- 1.1. "Aggrieved Woman": defines 'aggrieved woman' in relation to a workplace as any woman, whether employed or not, who alleges to have been subjected to an act of sexual harassment by the respondent. This would imply that the term extends to women who may be visitors or guests at the workplace.
- 1.2. "Respondent" means a person against whom the aggrieved woman has made a complaint.
- 1.3. "Complainant" means the person reporting an incident of Sexual Harassment of self or another colleague(s)
- 1.4. "Chairperson" means the Chairperson of the Local Complaint Committee nominated constitution of Local Complaint Committee.
- 1.5. "District Officer" means an officer notified by the appropriate Government in constitution of Local Complaint Committee.
- 1.6. "Employee" means a person employed at a workplace for any work on regular, temporary, ad hocs or daily wages basis, 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.
- 1.7. "Employer" means in relation to any department, organization, undertaking, establishment, enterprise, institution, office, branch, or unit of the appropriate Government. any person (in the context of the private sector) responsible for the management, supervision and control of the workplace and the person discharging contractual obligations with respect to his or her employees; Here "Management" includes the person or board or committee responsible for formulation and administration of policies for such organization.
- 1.8. "Internal Committee" means an Internal Complaints Committee constituted by the employer of a workplace.

- 1.9. "Local Committee" means a Local Complaints Committee constituted by district officer Member" means a Member of the Internal Committee or the Local Committee as the case may be.
- 1.10. "Presiding Officer" means the Head of the Internal Complaints Committee nominated by the employer at the time of constituting the internal committee.
- 1.11. "Workplace" Includes: any private sector organisation or a private venture, undertaking, enterprise, institution, establishment, society, trust, non-governmental organisation, unit or service provider carrying on commercial, professional, vocational, educational, entertainment, industrial, health services or financial activities including production, supply, sale, distribution or service;
- 1.12. any department, organization, undertaking, establishment, enterprise, institution, office, branch or unit which is established, owned, controlled or wholly or substantially financed by funds provided directly or indirectly by the appropriate Government or the local authority or a Government company or a corporation or a co-operative society;
- 1.13. hospitals;
- 1.14. any sports institute, stadium, sports complex or competition or games venue, whether residential or not used for training, sports or other activities relating thereto;
- 1.15. any place visited by the employee arising out of or during the course of employment including transportation provided by the employer for undertaking such journey;
- 1.16. "Victim" means the person subjected to Sexual Harassment.
- 1.17. "Harasser" means the person who is alleged/reported to have committed an act of Sexual Harassment.
- 1.18. "Unwelcome" means Behaviour that is not welcome, not solicited and not wanted by the offended person.
- 1.19. "Retaliation" means taking revenge (which could also include victimization and character assassination) against someone for complaining about sexual harassment.
- 1.20. "Workplace" defines 'workplace'. This definition extends to any place visited by the employee arising out of or during the course of employment and includes transportation provided by the employer for undertaking such journey.

2. OBJECTIVES:

- 2.1.1. To provide protection against sexual harassment of women at workplace and for the prevention and redressal of complaints of sexual harassment and for matters connected therewith or incidental thereto.

- 2.1.2. To set forth the expectations of conduct and mutual respect at the workplace with a focus on prevention of sexual harassment and the process of complaint if these expectations are not met or violated.
- 2.1.3. To articulate the Company's zero tolerance to sexual harassment and to identify punishments that can be recommended for such prohibited conduct.
- 2.1.4. To establish clearly that this Company is committed to providing a work environment that is free from discrimination and harassment in any form.
- 2.1.5. To make provision for giving effect to the convention- "Elimination of all forms of Discrimination against women" for protection of women against sexual harassment at workplace.

3. SCOPE:

- 3.1.1. This policy is applicable to all employees of the Company,
- 3.1.2. All contract employees, retainers, trainees, apprentices, ad hoc or daily wage basis, probationer, fixed time hires and third party personnel who visit and / or work in the Company premises and temporary employees are also expected to abide by this policy.
- 3.1.3. This Policy is to cover notional extended workplaces as well; which can also include the cyber space

4. DEFINITION OF SEXUAL HARASSMENT:

Sexual harassment has many different definitions and it is not the intent of this policy to limit the definition, but to give as much guidance as possible concerning what activities constitute and imply sexual harassment Sexual Harassment includes any such "unwelcome" sexually determined conduct (Whether directly or by implication) as:

4.1. Physical Harassment, which includes:

- 4.1.1. Physical contact and advances
- 4.1.2. Intentional touching, pinching, grabbing, brushing against another's body
- 4.1.3. Sexual assault
- 4.1.4. Cornering, trapping or blocking another's pathway
- 4.1.5. Excessively lengthy handshakes
- 4.1.6. Any physical, verbal or nonverbal or sexually implied / oriented conduct which is unwelcome.

4.2. Verbal Harassment, which includes:

- 4.2.1. Gesture-based harassment & sexually colored remarks.

- 4.2.2. Making sexually suggestive or off-color comments, threats, slurs, sexual propositions.
- 4.2.3. Sexual jokes or teasing, misogynist humor, sexually colored gender specific jokes.
- 4.2.4. Innuendoes and off-color remarks.
- 4.2.5. Comments about how someone looks, especially about parts of the body.
- 4.2.6. Catcalls, whistles and forms of address like "honey", "sweetheart", etc.

4.3. This is known as "quid pro quo sexual harassment:

- 4.3.1. A demand or request for sexual favours over promises related to employment such as work conditions, promotion, increments,
- 4.3.2. Implied or explicit promise of preferential or detrimental treatment in her employment.
- 4.3.3. Any implied or explicit threat about her present or future employment status; or
- 4.3.4. Interference with her work or creating an intimidating or offensive or hostile work environment for her; or humiliating treatment likely to affect her health or safety.

4.4. Written or Graphic Harassment, which includes:

- 4.4.1. Showing pornography, and
- 4.4.2. The display of pornographic material and watching pornography alone with the lady/ with friend/s, groups even with consent.
- 4.4.3. Written material that is sexual in nature such a letter or notes containing a sexual comment.
- 4.4.4. Leering or staring at another's body and / or sexually suggested gesturing.
- 4.4.5. Displaying sexually visual material such as pinups, cartoons, graffiti, computer programmers', catalogues of a sexual nature.
- 4.4.6. Sexualized environments and behaviours or objects that even if not directed at anyone in particular creates an offensive environment.
- 4.4.7. Any Other Unwelcome Physical, Verbal or Non Verbal Conduct of Sexual orientation or nature.

5. REDRESSAL MECHANISM :

- 5.1. Recommendations & Guidelines -"Internal Complaint Committee"
- 5.1.1. The Supreme Court has stipulated that Every employer of a workplace shall, by an order in writing, constitute a Committee to be known as the "Internal Complaints Committee": In PTPL it is "Prevention of Sexual Harassment Committee" – "POSH" Committee: which shall redress complaints on sexual harassment.

Chaired/headed by a Woman employed at senior level; nominated by the Leadership team of the Company.

- 5.1.2. It should have 50% women members.
- 5.1.3. Presiding Officer and every Member of the Internal Committee shall hold office for such period, not exceeding 3 years, from the date of their nomination as may be specified by the employer.
- 5.1.4. Provided that at least one-half of the total Members so nominated shall be women.
- 5.1.5. **Constitution of Internal Complaint committee:**
 - 5.1.5.1. (50% of the committee to be women)
 - 5.1.5.2. Member 1 : Presiding Officer (Should be Women)
 - 5.1.5.3. Member 2:
 - 5.1.5.4. Member 3:
 - 5.1.5.5. The committee should always have odd number of members. Additional members can be co-opted to ensure that all significant locations have representatives for ease of communication and raising of concerns.
 - 5.1.5.6. It should handle complaints in a confidential manner and within a fifteen days' framework, subject to all information being available.
 - 5.1.5.7. Where the Presiding Officer or any Member of the Internal Committee 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 he has been found guilty in any disciplinary proceedings or a disciplinary proceeding is pending against him; or 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.
 - 5.1.5.8. A Internal Compliant Committee shall prepare an annual report on sexual harassment cases to be submitted to the appropriate government authority as and when requested for.
 - 5.1.5.9. Each manager/ supervisor must treat every complaint of harassment communicated to him or her seriously by immediately contacting the POSH Committee. The complaint can be either raised by the affected person or by any employee, who has witnessed such behaviour or has heard about it from authentic sources giving details in writing / proof of the same, however the same should not be a gossip or a rumour or else the information will not be acted upon by the POSH Committee.

Whist the "Sexual Harassment of Women at Workplace (Prevention, Prohibition & Redressal) ACT, 2013, provides constitution of the "Internal Committee" to be constituted at all offices and administrative units of the workplace as located at different places. However for the purpose of convenience there is "POSH" committee representative member from each administrative office

6. INVESTIGATION GUIDELINES:

In order to ensure that a free and fair investigation takes place without any prejudice to any of the parties, the following guidelines have to be followed: Any aggrieved woman may make, in writing, a complaint of sexual harassment at workplace to the Internal Committee, within a period of three months from the date of incident and in case of a series of incidents, within a period of three months from the date of last incident. In case where such complaint cannot be made in writing, the Presiding Officer or any Member of the Internal Committee shall render all reasonable assistance to the woman for making the complaint in writing:

- 6.1. The Internal Committee if it is satisfied that the circumstances were such which prevented the aggrieved woman from filing a complaint within the said period. May, for the reasons to be recorded in writing, extend the time limit not exceeding three months.
- 6.2. Where the aggrieved woman is unable to make a complaint on account of her physical or mental incapacity or death or otherwise, her legal heir or such other person as may be prescribed may make a complaint.
- 6.3. Before the investigation starts the complainant and alleged harasser are advised to refrain from contacting each other in all possible ways. Even if they share work relationship that needs contact or communication during the investigation period; the contact and communication needs to happen via their managers. While undertaking investigation of a complaint the committee shall take the following into consideration. What exactly happened getting all details from the complainant first and then alleged harasser.
 - 6.3.1. Whether the conduct was verbal or physical or both.
 - 6.3.2. How frequently it happened
 - 6.3.3. Whether the conduct was unwelcome
 - 6.3.4. The working relationship in terms of hierarchy between the alleged harasser and the affected person.

- 6.3.5. Whether others (other than the alleged harasser) joined in perpetuating the harassment.
- 6.3.6. Whether harassment was directed at more than one individual.
- 6.3.7. The impact of the harassment on the affected person.
- 6.3.8. Did the victim in any ways indicate that the behaviour was unwelcome, to the alleged harasser or anyone else.
- 6.3.9. Did it create a hostile environment
- 6.3.10. All evidences through communication – handwritten, mails, phones cell phones photos etc
- 6.3.11. The Company will keep complaints, investigative records, and the results of the investigation confidential. If an investigation confirms that harassment has occurred, the Company will take corrective action, including appropriate discipline, any administrative action up to and including termination. The POSH committee shall be responsible to ensure safe delivery of the records of each of the cases and shall maintain appropriate and complete documentation which would be in the custody of the Company in entirety.

7. REDRESSAL PROCEDURE:

The redressal procedures shall be sensitive to the particularly delicate nature of complaints related to sexual harassment. Two types of redressal procedures can be adopted. Informal Redressal System (when the complaint is not submitted in writing) The informal redressal system will be employed under the following conditions:

- 7.1.1. When the alleged harassment seems open to discussion / when the facts are not very clear and conclusive which can be judged only after the enquiry proceedings.
- 7.1.2. When the person raising the complaint chooses to have an informal redressal for resolving the issue.

Mechanism of Informal Redressal:

Apart from what has been stated below as a first step an employee is free to directly approach the alleged harasser and demand that the harassing behaviour be stopped.

- 7.2. A discussion where the complainant and the harasser are invited to discuss and resolve the issue at that level itself.
- 7.3. Oral Warning to the harasser which shall be documented by the POSH committee at the time of reporting closure and be sent to the personal file of the harasser.

- 7.4. Before initiating the inquiry and at the request of the aggrieved woman take steps to settle the matter through conciliation.
- 7.5. No monetary settlement can be made as basis of conciliation.
- 7.6. Where such settlement is arrived, internal committee is required to record the settlement and forward it to the employer, take action as specified in the recommendation.
- 7.7. The Internal Committee, shall provide the copies of the settlement as recorded to the aggrieved woman and the respondent.
- 7.8. Where a settlement is arrived at conciliation no further inquiry shall be conducted by the internal committee.
- 7.9. Provided that where the aggrieved woman informs the Internal Committee, that any term or condition of the settlement arrived at under conciliation has not been complied with by the respondent, the Internal Committee shall proceed to make an inquiry into the complaint or, as the case may be, forward the complaint to the police.
- 7.10. The initial complaint may be orally reported to the POSH Committee.

8. FORMAL REDRESSAL SYSTEM:

For complaints of a more serious nature, the redressal advisor shall advise the complainant to register a written complaint for a formal redressal.

- 8.1. All complaints should be in writing by the complainant to ensure consistency and accuracy of what has been complained of. Receipt of complaints.
- 8.2. The complainant is required to state explicitly the incidence/s with date and time, place, circumstances prevailing at that time.
- 8.3. At this level strictest confidentiality shall be observed, therefore restricting all information generated to the smallest possible group.
- 8.4. It must be ensured that the process is brief and quick. The committee should respond to the complainant in 5 working days of its receipt on the further course of action, when the inquiry (if needed) will start.
- 8.5. The committee shall notify in writing, the time and date of the meeting that should be fixed within 5 working days of receiving the complaint. The complainant and the alleged harasser should be given a written notification to present themselves before the committee.
- 8.6. Both the parties should be heard separately. First the complainant should be heard and later the alleged harasser. Unless it is absolutely needed both the parties are not to be brought face to face.

8.7. A copy of the statement of the complainant should read out to the alleged harasser who will be allowed sufficient time (two working days) to seek advice before appearing.

9. INVESTIGATION & ENQUIRY:

9.1. Guidelines

9.1.1. During the pendency of an inquiry, on a written request made by the aggrieved woman, the Internal Committee may recommend to the employer to—

9.1.2. transfer the aggrieved woman or the respondent to any other workplace; or

9.1.3. grant necessary relief to the aggrieved woman;

9.1.4. On the recommendation of the Internal Committee, the employer shall implement the recommendations made and send the report of such implementation to the Internal Committee.

9.1.5. On the completion of an inquiry, the Internal Committee shall provide a report of its findings to the Board of Directors of the Company, 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.

9.1.6. Where the Internal 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.

9.1.7. Where the Internal Committee arrives at the conclusion that the allegation against the respondent has been proved, it shall recommend to the employer—

9.1.7.1. To deduct, notwithstanding anything in the service rules applicable to the respondent, 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 provisions.

9.1.7.2. Provided that in case the employer is unable to make such deduction from the salary of the respondent due to his being absent from duty or cessation of employment it may direct to the respondent to pay such sum to the aggrieved woman;

9.1.7.3. Provided further that in case the respondent fails to pay the sum referred to in clause (2), the Internal Committee may forward the order for recovery of the sum as an arrear of land revenue to the concerned District Officer.

9.1.8. For the purpose of determining the sums to be paid to the aggrieved woman under, the Internal Committee shall have regard to --

9.1.8.1. The mental trauma, pain, suffering and emotional distress caused to the aggrieved woman;

9.1.8.2. the loss in the career opportunity due to the incident of sexual harassment;

9.1.8.3. medical expenses incurred by the victim for physical or psychiatric treatment;

9.1.8.4. the income and financial status of the respondent;

9.1.8.5. Feasibility of such payment in lump sum or in instalments.

9.1.9. The employer shall act upon the recommendation within sixty days of its receipt by him

9.1.10. Any person aggrieved from the recommendations made or non-implementation of such recommendations may prefer an appeal to the court or tribunal in accordance with the provisions of the service rules applicable to the said person without prejudice to provisions contained in any other law for the time being in force,

9.1.11. The appeal shall be preferred within a period of ninety days of the recommendations of the internal committee.

10. INVESTIGATION/ INQUIRY PROCEDURE:

10.1. Immediately following the complaint, the Internal Compliant Committee must nominate three persons (minimum) from the committee to carry out confidential investigations,

10.2. In this process it should be ensured that at all times the dignity of both the complainant and the alleged harasser is respected.

10.3. Investigation will be carried out by the nominated persons (within 2 weeks of their appointment.

10.4. The witnesses chosen by the committee may be suggested by the complainant and alleged harasser and/ or may be chosen by the committee. If chosen by committee the complainant and alleged harasser need not know them.

10.5. The witnesses have to be told explicitly that they necessarily need to keep all information confidential.

- 10.6. The report of the investigation should be submitted to the POSH Internal Complaint Committee one working day before the committee convenes for the hearing.
- 10.7. The complainant and the alleged harasser will be allowed to bring a colleague for support that will not be permitted to interfere directly with the proceedings except to advise each party privately
- 10.8. Minutes will be taken down to record proceedings. If needed voice recording can be done, in any case an explicit and concise stating all discussion points and enquiry proceedings written summary needs to be made
- 10.9. The committee may give their Recommendations to the MD and the final decisions i.e whether the charges are proved , what is the severity and what punishment should be given will be finally decided by /MD who is an independent entity.
- 10.10. The implementation of the recommendations is the responsibility of HR manager. The noting of the case should go into the personal file against whom the concern is raised.
- 10.11. An appeal in writing can be made at the corporate level.
- 10.12. The information about closure of investigation and forwarding of recommendation by the Internal Complaint Committee should be disclosed to the alleged harasser and the complainant separately informally and may be verbal.
- 10.13. The action taken on recommendations by the HR manager should be informed to Chairperson of the Internal Complaint Committee. This would constitute the closure of the case.

11. POSSIBLE ACTIONS IN CASE OF FORMAL REDRESSAL MECHANISM:

- 11.1. A letter of warning will be placed in the personal file for the offence that is deemed minor by the POSH Committee such as offensive behaviour that is verbal, graphic or through gesticulation
- 11.2. Action may vary from warning, reduction and comments in performance rating, promotion decisions, opportunity for assignments etc to termination of services, depending upon the intensity & severity of violation of conduct.
- 11.3. Refer to ANNEXURE II for minor and major actions prescribed according to POSH policy.

11.4. The committee at all times should be sensitive to the possibility of the harasser displaying retaliatory behaviour.

12. RETALIATION AND VICTIMISATION:

12.1. All managers, supervisors should ensure that there is no retaliation or reprisal in any way against anyone who has complained about and / or resisted harassment, discrimination or retaliation. Retaliatory behavior and attempts to cover up such retaliation or reprisal should also be strictly discouraged and will be viewed seriously by management.

12.2. In the eyes of law it is considered seriously, even if the sexual harassment charges are not established but the retaliation is proved, the harasser would be held guilty.

13. TREATMENT OF FALSE COMPLAINTS/ ALLEGATIONS:

13.1. This is a very sensitive area and any allegations/ complaints, however discreetly handled, could prove derogatory for the person against whom it has been raised. Baseless allegations should therefore be strictly avoided. The complainant would be warned right at the beginning of the enquiry of the consequences of a false complaint.

13.2. In case 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 the service rules applicable to the said witness.

13.3. Notwithstanding anything contained in the Right to Information Act, 2005, the contents of the complaint made, the identity and addresses of the aggrieved woman, respondent and witnesses, any information relating to conciliation and inquiry proceedings, recommendations of the Internal Committee and the action taken by the employer the provisions of this Act shall not be published, communicated or made known to the public, press and media in any manner:

13.4. Where any person entrusted with the duty to handle or deal with the complaint, inquiry or any recommendations or action to be taken, contravenes the provisions shall be liable for penalty in accordance with the provisions of the service rules applicable to the said person or where no such service rules exist, in such manner as may be prescribed.

13.5. In the case where a false complaint has been filed the investigation has proved that the motivation of the complaint was purely to defame the alleged Harasser, disciplinary action shall be initiated against the complainant.

14. COMMUNICATION AND TRAINING:

14.1. The purpose of these guidelines is to prevent sexual harassment from occurring at workplaces so that the dignity of the employees is protected in the first place, by way of encouraging harassment free workplace.

14.2. In order that this is done, appropriate and inappropriate behaviour must be conveyed to every employee of organization, including contractors, fixed time hires, retainers, third party vendors, suppliers etc.

14.3. It is important that the members of the redressal committee are fully aware of the policy and their responsibility.

14.5. A Gender Sensitivity Training shall be organized for them to make them aware of the gender dynamics that take place within a work environment; this will help them to get a fuller understanding of the different perceptions of appropriate behavior.

14.6. The redressal advisor is the pivotal point of sexual harassment Policy and must be given training in counselling. The Redressal Advisor should be someone whom employees will feel free to confide and trust and should be easily accessible and freely available to all employees.

15. AWARENESS OF APPROPRIATE BEHAVIOUR TO EMPLOYEES:

15.1. To reach every employee within the group, it is essential that the policy be communicated to every employee. It will be the responsibility of the Corporate HR Department to send the policy to every HR manager at all locations. In case of the worksites the location HR department will then communicate these to the HOD whose responsibility it is to circulate this document to the employees in the their department.

15.2. Every employee on reading the document will then endorse it to ensure that each has understood the document and will abide by it. The HR department shall file these signatures.

15.3. This procedure will ensure that the Company has made its policy clear to every employee. Subsequent to endorsing the Anti-Harassment policy, any claim of ignorance as an excuse to explain inappropriate behaviour, will not be accepted.

15.4. Employees intending to clarify their understanding of the policy are encouraged to call the redressal advisor.

15.5. In case of new employees, as part of their induction programme, they should be introduced to the redressal advisor who will explain and hand-over the policy and obtain their endorsement.

16. EVALUATION OF POLICY:

16.1. The Sexual Harassment Policy shall be evaluated so that any amendments required may be recommended by the Internal Compliant Committee based on their experience of dealing with complaints.

16.2. The exercise shall be an annual exercise at the minimum. The Policy will be flexible to amendments to address situations that the policy has not covered at the onset.

17. ROLES & RESPONSIBILITIES

17.1. Employer — provides a safe working environment at the workplace which shall include

17.1.1. safety from the persons coming into contact at the workplace; display at any conspicuous place in the workplace, the penal consequences of sexual harassments; and the order constituting the Internal Committee

17.1.2. Organise workshops and awareness programmes at regular intervals for sensitising the employees with the provisions of the Act and orientation programmes for the members of the Internal Committee in the manner as may be prescribed;

17.1.3. Provide necessary facilities to the Internal Committee for dealing with the complaint and conducting an inquiry;

17.1.4. Assist in securing the attendance of respondent and witnesses before the Internal Committee.

17.1.5. Make available such information to the Internal Committee, as it may require having regard to the complaint made.

17.1.6. Provide assistance to the woman if she so chooses to file a complaint in relation to the offence under the Indian Penal Code or any other law for the time being in force;

17.1.7. cause to initiate action, under the Indian Penal Code or any other law for the time being in force, against the perpetrator, or if the aggrieved woman so desires, where

the perpetrator is not an employee, in the workplace at which the incident of sexual harassment took place; Treat sexual harassment as a misconduct and initiate action for such misconduct;

17.1.8. Monitor the timely submission of reports by the Internal Committee.

17.1.9. 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.

17.2. Employees-

17.2.1. Abstain from committing acts amounting to sexual harassment whether explicit or implied resulting in unwelcome behaviours or creating hostile environment.

17.2.2. Report incidents of Sexual Harassment without fear or favour.

17.3. Functional Head /SBU HR Head

17.3.1. Take action as recommended by the committee.

Disclaimer: Complete care has been taken to incorporate all the relevant provision of the "Sexual Harassment of Women AT Workplace (Prevention, Prohibition & Redressal) ACT, 2013 into the policy "Prevention of Sexual Harassment at Workplace" (POSH). However, if at any time there is a discrepancy found between the Act & Policy, the provision of Act shall prevail.

For **C K K RETAIL MART LIMITED**



or