

Finulent Solutions LLP

POLICY ON PREVENTION, PROHIBITION & REDRESSAL OF SEXUAL HARASSMENT AT THE WORKPLACE

POSH+ POLICY



Note from the COO:

Dear Employee,

Finulent Solutions LLP ("Finulent" OR "Firm") is committed to creating and maintaining a secure work environment where it's Employees, Agents, Vendors and Partners can work and pursue business together in an atmosphere free of harassment, exploitation and intimidation caused by acts of Sexual Harassment within but not limited to the office premises and other locations directly related to the Firm's business.

To maintain a healthy, dignified, safe and productive work environment, free from gender bias, discrimination and harassment Finulent's Code of Conduct embalms ethicality and integrity as its core values and promotes a supportive workplace culture free of harassment, intimidation, bias, and unlawful discrimination.

The Code states that it strictly prohibits unlawful discrimination or harassment on the basis of race, color, religion, national origin, ancestry, pregnancy status, sex, gender identity or expression, age, marital status, mental or physical disability, medical condition, sexual orientation, or any other characteristics protected by law. Further, Clause II Finulent Code prescribes the path for achieving this goal by means of 1. Equal Opportunity Employment, 2. Prohibition against Harassment, Discrimination and Bullying 3. Creating a Safe Workplace.

As a Firm, we expect you to deliver your best in all circumstances and it is our responsibility to ensure you work in a safe, secure, fearless and congenial work environment. In order to achieve this, it is important to protect you against harassment of all kinds and the anti-sexual harassment policy is launched with an intent to provide a work environment free from sexual harassment.

The objective of this policy is 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.

All concerned should take cognizance of the fact that Finulent strongly opposes sexual harassment, and that such behaviour against women is prohibited by the law as set down in The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and Rules framed thereunder being The Sexual Harassment of Women at Workplace (hereinafter referred to as "Act") as well as the terms of employment. Commission of any act of sexual harassment as defined in the Act and in this Policy shall result in strict disciplinary action.

At Finulent, we have zero-tolerance for sexual harassment. We value each employee working with us and wish to protect their dignity and self-respect irrespective of their gender preference. In doing so, we are determined to promote a working environment in which all genders complement each other as equals in an environment that encourages maximum productivity and respects personal dignity.



We at Finulent are committed to giving every employee a just and fair hearing on issues encountered by them at the workplace with special attention to sexual harassment. All allegations of sexual harassment will be quickly and discreetly investigated, and the disciplinary action will be initiated as per the details provided in this policy. The concerns and reports can be made without fear of reprisal or retaliation. Finulent will take very serious disciplinary action against any victimization of the employee who is complaining or the alleged harassment that may result from a complaint. To the extent possible, the identity of the Aggrieved, Witnesses and the Harasser (Respondent) will be protected against unnecessary disclosure. All efforts shall be made to ensure that all proceedings remain confidential.

This version of the policy is effective from 19th February 2024 and supersedes all prior policies and communication on this matter.

Regards,

Signature:

Abhardari

Name: Ankita Bhandari

Designation COO



FINULENT POLICY FOR PREVENTION OF SEXUAL HARASSMENT AT THE WORKPLACE

1. PURPOSE:

- 1.1. This policy provides protection against sexual harassment at workplace and the prevention and redressal of complaints of sexual harassment and matters related to it. More specifically the purpose of this Policy is following:
 - To create and maintain safe work environment, free from sexual harassment & discrimination for all its employees as per the Sexual Harassment of Women at Workplace (Prevention, Prohibition & Redressal) Act, 2013 hereinafter referred to as POSH Act, 2013.
 - ii. To set forth the expectations of conduct and mutual respect at the workplace with a focus on prevention of sexual harassment and setting the process of complaint if these expectations are not met or violated.
 - iii. To articulate Firm's zero tolerance to sexual harassment and to identify punishments that can be recommended for such prohibited conduct.
- 1.2. The POSH+ policy is not only compliant with the POSH Act and Rules 2013, but a step forward in recognizing and addressing vulnerabilities of all genders. It also covers varied situations through a wide definition of what constitutes "gender", "sexual harassment", "workplace", "employee", who can be an "aggrieved person" and such other terms that are integral to the implementation of the policy and its objectives.
- 1.3. While this Policy covers all the key aspects of the Act, for any further clarification, reference shall always be made to the POSH Act. Please note that in the event of any conflict between the POSH Act, 2013 and the Firm's POSH+ Policy, the provisions of the POSH Act shall prevail.

2. SCOPE:

- 2.1. Finulent's Policy with regard to Prevention, Prohibition and Redressal of Sexual Harassment covers every "employee" across the Firm. Finulent encourages every employee who believes they are sexually harassed to use the redressal mechanism as provided in this policy.
- 2.2. The Policy is with respect to Prevention, Prohibition & Redressal of Sexual Harassment which may arise in places not limited to geographical location viz. Firm's offices/branches but includes all such places or locations where acts are conducted in the context of working relationships or whilst fulfilling professional duties or which may be visited by an employee during the course of employment including transportation provided by the Firm for undertaking such visit. Finulent's Policy against sexual harassment includes



sexual harassment by fellow employees, supervisors, managers as well as agents, contractors, customers, vendors, partners and, visitors including outsourced employees. Any place visited by the employee arising out of or during the course of employment, including transportation provided by the employer for undertaking such a journey.

- 2.3. Further, for the limited purpose of this Policy, any visitors, suppliers, customers, or business associates ("Third Parties") who visit the Workplace will be treated as being subject to this Policy both as Complainants and Respondents (as defined in Clause 3).
- 2.4. Sexual harassment is judged by the impact on the complainant and not the intent of the Respondent. Sexual harassment as addressed in this Policy need not necessarily be from a male to a female employee, it can be between individuals of the same or the opposite gender.
- 2.5. This Policy comes into force with immediate effect from its date of public notification.

3. **DEFINITIONS**:

- i. "Aggrieved Person" means:
 - a. a person in relation to a workplace, is a person (woman/man/third gender/non-binary) who is an employee of the Firm, who alleges to have been subject to any act of sexual harassment by the Respondent.
 - b. 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. "Complainant" is an aggrieved person who has made the complaint.
- iii. "Employee" means a person employed at the 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 by any other such name.
- iv. "Employer" means a person responsible for management, supervision and control of the workplace.
- v. "Gender" Gender includes men, women and third gender including non-binaries and refers to the social attributes and opportunities associated with being male, female, third gender and non-binary as well as the relationships between and among them.
- vi. "Internal Complaints Committee" means a committee constituted by the Firm as per this policy.
- vii. "Respondent" means a person against whom the aggrieved has made a complaint.
- viii. "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 or behaviour (whether directly or by implication) at workplace or which makes a person feel offended, humiliated and/or intimidated. It includes situations where a person is asked to engage in sexual activity as a condition of that person's employment, as well as situations which create an environment which is hostile, intimidating or humiliating for the recipient.

ix. "Workplace" for the limited purpose of this Policy means in addition to the place of work [head office / branch offices etc.] it shall also include any place where the aggrieved or the respondent visits in connection with his/her work, during the course of and/or arising out of employment/ contract/ engagement with Finulent, including transportation provided for undertaking such a journey.

4. POLICY GUIDELINES:

- 4.1. Sexual Harassment at the Workplace includes one or series of incidents, whether direct or implied, involving Physical Contact & Sexual advances whether as
 - Demand or request for sexual favors;
 - Sexually-coloured remarks;
 - Showing pornography;
 - Any other unwelcome physical, verbal or non-verbal or written conduct of a sexual nature.
- 4.2. 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:
 - Implied or explicit promise of preferential treatment in employment; or
 - o Implied or explicit threat of detrimental treatment in employment; or
 - o Implied or explicit threat about present or future employment status; or
 - Interference with work or creating an intimidating or offensive or hostile work environment; or
 - Humiliating treatment likely to affect health or safety of the victim.
- 4.3. Sexual harassment in the workplace is generally of two distinct types.
 - A. Quid Pro Quo (Conditional) Sexual Harassment: "Quid pro quo" sexual harassment means seeking sexual favors or advances in exchange for preferential treatment. This kind of sexual harassment occurs when consent to sexually explicit behaviour or speech is made a condition for employment or preferential treatment in employment. This kind of sexual harassment also occurs when refusal to comply with



- a "request of sexual favour" is met with retaliatory action such as dismissal, demotion, difficult working conditions etc.
- B. Hostile working environment sexual harassment: Hostile working environment sexual harassment occurs where employees in a workplace are subject to a pattern of exposure to unwanted and unwelcome sexual behaviour from the management or co-workers. This kind of behaviour makes the work environment of an employee hostile. This is for the reason that such conduct creates an intimidating, offensive, oppressive, abusive or humiliating work environment and which is severe and pervasive enough to interfere with a person's ability to work and perform.

Explanation of the word 'Unwelcome' – Unwelcome is the key in defining what conduct constitutes sexual harassment. The conduct in question must have been unwelcome. In other words, the complainant employee must have found the behaviour in question as offensive, repulsive or repugnant. It is the impact and effect the behaviour or conduct has on the recipient that will define the behaviour as sexual harassment.

Annexure 'A' of this Policy provides an indicative list of examples of behaviour which may be found to constitute sexual harassment in the workplace.

5. INTERNAL COMPLAINTS COMMITTEE

- 5.1. Every complaint received shall be forwarded to the Internal Complaints Committee formed under the policy for redressal. The investigation shall be carried out by the Internal Complaints Committee constituted for this purpose.
- 5.2. Internal Complaints Committee has been constituted of the following members as nominated by the Firm:
 - i. A woman employee employed at a senior level amongst the employees shall act as Presiding officer of the committee.
 - ii. Not less than 2 members from amongst employees preferably committed to the cause of women OR who have had experience in social work OR have legal knowledge.
 - iii. One member shall be from amongst Non-governmental organizations OR associations committed to the cause of women OR a person familiar with the issues relating to sexual harassment.
- 5.3. The Name of the Members of the Internal Complaints Committee is as per **Annexure B** of this Policy and any change in such composition shall be effected in the policy.
- 5.4. At least half the total members of the Committee must be women. The Presiding Officer and every member shall hold office for such period, not exceeding three years, from the date of their nomination as may be specified by the employer.



The Internal committee is empowered to receive complaints, conduct enquiries and recommend appropriate actions for redressal and punishment. In case, a complaint is received against a member of the Committee itself, the concerned individual shall be required to step down, and shall be replaced by another person from the same category as decided by the Firm's management.

5.5. Any casual vacancy shall be filled by fresh nomination in accordance with the provisions of The Act.

6. COMPLAINT MECHANISM AND REDRESSAL PROCEDURE:

The complaints procedure has been outlined in consideration with the applicable laws. These procedures are based on an overall process flow which is as given below:

6.1. Complaint:

Any aggrieved person may make, in writing, a complaint of sexual harassment at workplace to the committee giving details of the sexual harassment meted out to her/him within a period of 3 months from the date of incident and in case of a series of incidents, within a period of 3 months from the date of last incident, which may be extended for a further period of 3 months, if circumstances warrant such an extension in the opinion of the Internal Complaints Committee.

- 6.1.1. The Presiding Officer or any Member of the Internal Complaints Committee can render reasonable assistance to the person to enable making a complaint in writing in case they are unable to do so.
- 6.1.2. On receipt of a complaint, the Internal Complaint Committee shall decide the place and time for hearing the complaint and shall intimate the date, time and place of hearing to the Complainant and Respondent. The Internal Complaints Committee shall follow the principle of Natural Justice while handling such complaints.

6.1.3.

- i. Where the aggrieved person is unable to make a complaint on account of their physical incapacity, a complaint may be filed by
 - a) a relative or friend; or
 - b) a co-worker; or
 - an officer of the National Commission for Women or State Women's Commission; or
 - d) any person who has knowledge of the incident, with the written consent of the aggrieved person.
- ii. Where the aggrieved person is unable to make a complaint on account of their mental incapacity, a complaint may be filed by
 - a) a relative or friend; or
 - b) a special educator' or
 - c) a qualified psychiatrist or psychologist; or



- d) the guardian or authority under whose care they are receiving treatment or care; or
- e) any person who has knowledge of the incident jointly with any of the above.
- iii. Where the aggrieved person 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 person is dead, a complaint may be filed by any person who has knowledge of the incident, with the written consent of their legal heir.
- 6.1.4. Internal Complaints Committee on receipt of such written complaint, may if required, ask the aggrieved person to furnish additional information about the alleged harassment.
- 6.1.5. The Complainant or person authorized on their behalf as per the above provision, shall make a complaint to the Internal Complaints Committee in the Format prescribed in **Annexure C** through the following mode:
 - i. Copy of complaint may be sent along with supporting documents and names and address of witness shall be sent to the Internal Complaints Committee at posh.icc@finulent.com
 - ii. The complainant shall further submit six copies of the complaint accompanied by available supporting documents and relevant details concerning the alleged act of sexual harassment(s) including names and address of witnesses, if any which the complainant believes to be true and accurate.
 - iii. On receipt of such complaint, the Internal Complaints Committee shall provide a copy along with supporting documents of such complaints to the Respondent within 7 working days.
 - iv. Respondent shall file a reply within 10 working days of receipt of the complaint along with a list of documents, names, and addresses of witnesses.
 - v. Internal Complaint Committee shall investigate in detail into the matter of the complaint. The Internal Complaints Committee shall have the right to call the person against whom the complaint is made or any other witnesses as to when necessary.
 - vi. Internal Complaint Committee shall have the right to terminate the enquiry or give ex-parte decision on the complaint, if the Respondent or complainant remains absent for 3 consecutive hearings, without sufficient cause.
 - vii. The Internal Committee must complete its investigation within a period of 90 days.
 - viii. The parties shall not be allowed to bring any legal practitioner to represent them in their case at any stage of the proceedings before the Internal Complaints Committee.
 - ix. For conducting the enquiry, the quorum of the Internal Complaints Committee shall be of 3 members including the presiding officer.



6.2. **Conciliation:** The Committee may, before initiating an inquiry, and at the request of the Complainant, take steps to settle the matter between the Complainant and the Respondent through conciliation. However monetary settlement cannot be made a basis of conciliation. Where a settlement is arrived at, no further inquiry shall be conducted by ICC, as the case may be.

Important Note: Withdrawal of the complaint at any stage of the proceedings shall not preclude the Committee from proceeding with the investigation where there is obvious truth or merit to the allegations in the complaint or where there is documentary or direct evidence that can prove the guilt of the person complained of.

6.3. Inquiry:

- 6.3.1. In the absence of conciliation or where the Respondent breaches the terms of settlement arrived at during the conciliation, the ICC shall investigate into the issue and prepare a report at the end of the investigation.
- 6.3.2. The committee for the purpose of its investigation would be entitled to elicit all forms of evidence, including access to written communication, witnesses, previous records, and all the employees and the Firm would co-operate in this regard.
- **6.3.3.** Both the Complainant and the Respondent shall be given an opportunity to present their views to the committee. After hearing both individuals and any other concerned parties in the case and based on the investigation, the ICC will prepare a case report, in writing, outlining the case, the investigation and the suggestions including the reformative action to be initiated, within no later than 90 (ninety) working days from the date of the complaint.
- 6.4. **Interim relief:** Until the final report is prepared on the case, ICC may recommend the Firm to take certain interim measures to protect the victim and provide safe working environment such as:
 - (i) Transfer the complainant or the accused to any other workplace or other team; or
 - (ii) Grant leave to the complainant up to a period of three months. The leave granted shall be in addition to the leave that the complainant would otherwise be entitled; or
 - (iii) Restraining the respondent from reporting on the work performance of the complainant or writing his/her confidential reports, and assign him/her to another team/manager; or
 - (iv) Grant such other relief to the complaint as may be required; or



(v) Please note that the Firm has discretion to grant such requests based on the necessity and facts and circumstances of each case.

6.5. Final verdict:

- 6.5.1. The Committee shall on completion of the enquiry provide a report of its findings within 10 days from the date of completion of the enquiry and such report shall be made available to the concerned parties.
- 6.5.2. If the allegation against the respondent has not been proved, the Committee may recommend that no action needs to be taken in the matter.
- 6.5.3. If the Internal Complaints Committee arrives at the conclusion that the allegation against the respondent has been proved, it shall recommend to:
 - a) Take action for sexual harassment as misconduct.
 - b) To tender written apology to the complainant, issue warning, withholding of promotions/increments of the Respondent, terminating the Respondent.
 - c) To deduct from salary/wages of the respondent or issue direction for payment; such sum as it may consider appropriate to be paid to the aggrieved person or to their legal heirs, as it may determine.
- 6.5.4. The management shall take action on the recommendations of the ICC within a period of sixty (60) days from the date of receipt of Inquiry Report,
- 6.5.5. In the event the Respondent is a Third Party, the Firm shall:
 - a) if the nature of sexual harassment amounts to an offence under the Indian Penal Code, file a complaint with the appropriate enforcement authority,
 - b) In other instances, forward details of the ICC inquiry and findings to the Third Party's employer and require removal of the Respondent from the workplace and/or seek other remedial measures and/or sever the relationship with such Third Party.

6.6. **Malicious Complaint:**

- 6.6.1. The complaint of sexual harassment made by any employee shall be taken up with utmost seriousness by the Firm. However, there shall be zero tolerance for any false accusation.
- 6.6.2. If the Internal Complaint Committee concludes that the allegation was made with malicious intent or the aggrieved person or any other person making the complaint on behalf of the aggrieved person-produced false or forged or misleading documents to prove his/her case, the Internal Complaint Committee may recommend action to be taken against the person who has made the complaint, including termination of service. In such a case, malicious intent must be established after an inquiry before any action is recommended. A mere inability to substantiate



a complaint or provide adequate proof would not attract action as provided herein. A similar recommendation for taking action would be made against any witness whom the Internal Complaint Committee concludes has given false evidence or produced forged or misleading documents.

- 6.6.3. It is to be noted that this statement is not intended to discourage employees from coming forward with any complaints. Finulent recognizes and expects that some claims may be difficult to prove or support, or may not, in fact, be found to raise to the level of seriousness deemed necessary to constitute Sexual Harassment. These types of complaints will not be considered to be false accusations.
- 6.7. **Appeal:** Any party not satisfied or further aggrieved by the implementation or non-implementation of recommendations made, may appeal to the appellate authority in accordance with Section 18 of The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and rules, within 90 days of the recommendations being communicated.
- 6.8. **Legal Compliance:** The ICC shall in each calendar year prepare, in such format as may be prescribed, an annual report and submit the same to the employer and the District Officer (as defined in the Act). The report shall have the following details:
 - o number of complaints of Sexual harassment received in the year
 - o number of complaints disposed of during the year
 - o number of cases pending for more than 90 days
 - o number of workshops or awareness program against Sexual Harassment carried out
 - o nature of action taken by the employer or District Officer

7. AWARENESS

- 7.1. A brief shall be given to all existing employees regarding the features of this Policy immediately on the formulation of the Policy and to new employees in Finulent during their initial Induction.
- 7.2. The Firm shall comply with all other details as set out under Section 19 of the Act to ensure that all employees are provided with the safe working environment at the workplace.
- 7.3. The Firm shall display the notice showing the name of the Internal Complaints Committee members at its every establishment at a conspicuous place.



8. MISCELLANEOUS:

8.1. **Confidentiality:** The identity of the complainant, respondent, potential witnesses, statements and other evidence obtained in the course of inquiry process, recommendations of the committees, action taken by the employer is considered as confidential materials, and not published or made known to public or media. Any person contravening the confidentiality clauses is subject to disciplinary action as prescribed in the act.

For certain offences on complainant's desire, the ICC will be under an obligation to report matters to the police/or file an FIR in accordance with requirements of POSH Act, 2013.

- 8.2. **Protection to complainant/victim**: The Firm 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 Firm 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.
- 8.3. The Firm may make any alteration or amendment or rescind any of the clauses of this Policy as and when it finds it necessary to do so as long as it complies with the Act. Any such alterations or amendment or rescinding will be intimated to the employee.
- 8.4. In the case of complaints which the ICC deems as outside its jurisdiction, like offences of a criminal nature under the Indian Penal Code, it will provide all necessary assistance to the Aggrieved Person in filing such complaint with the appropriate legal authorities in accordance with the applicable laws.
- 8.5. If an Aggrieved Person chooses to initiate proceedings in a court or tribunal, the Firm shall take steps to support such person in the proceedings, including by providing Firm data and Employee records.
- 8.6. Nothing contained in these rules shall operate in derogation of any law for the time being in force or to the prejudice of any right of any employee under any other Rules or Law.



ANNEXURE A: SOME EXAMPLES OF SEXUAL HARASSMENT IN THE WORKPLACE

A. Visual Conduct:

- Leering
- Making sexual gestures
- Displaying sexually suggestive or explicit objects, pictures (still or moving), cartoons, graffiti or posters in any manner, including as part of e-mail transmissions

B. Verbal Conduct:

- Whistling and/or catcalls
- Foul or obscene language
- Making or using derogatory comments which are sexual in nature
- Explicit discussions about sexual activities/behaviours
- Comments about a woman's physical attributes
- Spreading rumour about another person's sexual activities/conduct and/or partners
- Jokes which contain offensive, obscene or lascivious content
- Sexual advances / Sexual propositions
- Sexual innuendo or double entendre

C. Written Conduct:

- Suggestive, obscene or propositioning letters, notes, greeting cards or invitations, including but not limited to those transmitted via e-mail
- Displaying pictures (still or moving), cartoons, graffiti or posters in writing, including but not limited to e-mail

D. Physical Conduct:

- Unwelcome touching
- Sexual Assault
- Kissing/Hugging / Grabbing
- Coercing another person to participate in sexual intercourse or other sexual behaviours
- Impeding or blocking movements
- Any physical interference with normal work or movement.
- Sexual gestures

This is only an indicative list of the possible acts which could be treated as sexual harassment and is in no way intended to be construed as an exhaustive list.



ANNEXURE – B

Composition of Internal Complaints Committee

For North India Region

S. No.	Name	Email ID	Membership
1	Ms. Meena	meena@finulent.com	Presiding Officer
2.	Ms. Shalini Shrivastav	shalini@attentiocs.com	External Member
3.	Mr. Vikas Dhawan	vikas.dhawan@finulent.com	Member
4.	Mr. Kamlesh Rathour	kamlesh.rathour@finulent.com	Member

For West India Region

S. No.	Name	Email ID	Membership
1	Ms. Ekta Kamble	ekta.kamble@finulent.com	Presiding Officer
2.	Ms. Shalini Shrivastav	shalini@attentiocs.com	External Member
3.	Mr. Suraj Nair	suraj.nair@finulent.com	Member
4.	Mr. Yazad Sui	yazad.sui@finulent.com	Member

For South India Region

S. No.	Name	Email ID	Membership
1	Ms. Vanitha Narayanan	vanitha.narayanan@finulent.com	Presiding Officer
2.	Ms. Shalini Shrivastav	shalini@attentiocs.com	External Member
3.	Mr. Mebin Muttath	mebin.muttath@finulent.com	Member
4.	Mr. Bhuvanesh Rajanbabu	bhuvanesh.r@finulent.com	Member



Annexure C

Information to be provided in a Complaint

A complaint of Sexual Harassment made under this Policy should, to the extent reasonably possible, contain the following basic information:

- 1. Name of the Complainant, designation, and contact details (postal address, email id and telephone number).
- 2. Name and other details of the Respondent including, designation, contact details (postal address, email id and telephone number).
- 3. Details of the alleged incident(s) A description of the incident(s), specifying the act(s) the Respondent is alleged to have committed, the date(s) and time(s) on which the incident(s) took place, the place where the incident(s) occurred. This information should be stated in as much detail as is possible for the Complainant to provide.
- 4. List of witness (if any), along with their contact details.
- 5. Any other information that the Complainant wishes to share with the IC.
- 6. The complaint shall be signed by the person making it.

Complaint shall be addressed to the ICC and sent as under:

Email: posh.icc@finulent.com
Physical Sets addressed to:

The Presiding Officer,
Respective Internal Complaints Committee for the region,
Office Address