



---

# Governance Handbook

*December, 2014*

---

## Table of Contents

<b><u>Particulars</u></b>	<b><u>Page No.</u></b>
Introduction	3
Vision, Mission and Strategy	4
Statutory Compliances	5
Financial Management	8
Transparency, Accountability and Control	10
Advisory Committee	11
Athlete's Participation, Involvement and Care	12
Integrity and Ethics	13
Relations with Strategic Partners, Sports Federations and Government bodies.	17



## Introduction

The Glenmark Aquatic Foundation (“Foundation”) is a CSR initiative of Glenmark Pharmaceuticals Ltd. As outlined in the CSR policy of the organization, Glenmark Aquatic Foundation will encourage, promote and aid the development of the sport of swimming in India and take this sport in India to International level, thereby contributing to the upliftment and well-being of the society at large.

Glenmark Aquatic Foundation will partner with other like-minded institutions (Government/ Semi Government/ NGOs, Trusts, Autonomous Organizations, Educational Institutions, Professional Consultancy Organisations or any other appropriate agency) to develop an ecosystem across India that nurtures excellence in performance of swimmers at the regional & international level.

Governance principles of this Foundation will be in conformity with that of the CSR policy of the organization.

The Trustees of the Foundation at its own direction may make changes in this Governance Handbook and the policies as it deems fit from time to time.

## Vision, Mission & Strategy

### Vision

The CSR policy of the organization envisions a happier and healthier world. The vision of this Foundation, in keeping with this, foresees:

### Creating Champions through Aquatics.

### Mission

- To be a responsible organization
- To uphold the values of sports and sportsmanship
- The sporting youth will remain the primary beneficiary of all activities
- To bring all round benefits from the sport of swimming to the largest number of children and youth across India
- To commit all possible efforts in improving the ecosystem for swimming across India
- To plan and implement strategic initiatives within this ecosystem so as to nurture champions in the field of swimming, and sport in general
- To present stellar performances by Indian swimmers in the International arena

### Strategy

Create a wide base of swimming talent across India at the junior level. This would be achieved through the following strategic actions:

- Quality & Quantity of Coaching HR
  - To significantly expand the number of qualified coaches across India and improve the level of expertise in the field of coaching
- High Performance Training Academy
  - Provide world class swim training at a managed facility
- Incentivize pursuit of excellence in swimming and coaching
  - Provide adequate recognition, support and rewards in order to motivate athletes and coaches to excel
- Swimming as a Career Path
  - Establish swimming as an aspirational path to a bright future

## **Statutory Compliances**

### **Under the Public Trusts Act:**

#### **Budget (Section 31A & Rule 16A)**

Trustee of every public religious trust having annual income exceeding Rs. 5,000 and Rs. 10,000 in case of other trusts has to prepare and submit the budget to the Charity Commissioner, one month before the commencement of the accounting year. The budget has to be prepared as per format given in Schedule VIIA.

#### **Accounts and Audit (Sections 32, 33 & 34)**

Regular accounts should be maintained. Balance sheet should be prepared as per Schedule VIII and Income and Expenditure account as per Schedule IX. If the trust/society operates in more than one city or geographical region with separate branch or project offices, the accounts of all such branches or project offices should be consolidated. Contribution under Section 58 has to be made as per consolidated income. Accounts shall be balanced on 31st March every year or on such other day as may be fixed by the Charity Commissioner. Audit should be completed within 6 months of the completion of the accounting year. The auditor should forward a copy of the Balance Sheet and Income & expenditure account along with his Audit report to the Deputy or Assistant Charity Commissioner within a fortnight of the audit. Trust having an annual income of Rs. 15,000 or less is exempt from audit. Trust exempted from audit is required to file affidavit as to the extent of their income and also has to file accounts in Schedule IX-A and IX-B within 3 months of the completion of the accounting year.

#### **Intimation of Change: Sections 22 & 22(1A)**

Where any change occurs in any of the entries i.e. Details of Trustees; Trust Property etc., the same has to be intimated to Charity Commissioner within 90 days of occurrence of change in Form "Schedule III" along with relevant documentary evidence. Intimation of change relating to any immovable property has to be given in Form 'Schedule IIIA' (change report).

#### **Immovable property (Section 36)**

Investment in immovable property requires Charity Commissioner's permission. Prior permission of Charity Commissioner is required for sale, exchange, gift of any immovable property, lease exceeding a period of 3 years in case of non-agricultural land/building, lease exceeding 10 years in case of agricultural land.

### **Borrowing Powers of Trustees (Section 36A)**

No Trustees should borrow money for the purpose of or on behalf of trust except with previous sanction of the Charity Commissioner.

### **Contribution to Charity Commissioner (Section 58) (Schedule IXC)**

A public trust (other than one which is exempt) having gross annual income (from all sources) exceeding Rs. 25,000 has to pay contribution to the Public Trust Administration Fund @2%. Gross annual income excludes corpus donations. Contribution is payable @2% on the gross annual income after making the deductions prescribed in Rule 32.

### **Changing the objects of the trust**

An application has to be made to the Charity Commissioner who in turn may further require the trust to take sanction from the Court.

### **Compliances under Income Tax Act, 1961 and Income Tax Rules, 1962 Compulsory Audit Audit**

If the total income of a non-profit organisation as computed exceeds the maximum amount which is not chargeable to income tax in any previous year, the accounts are to be audited by a Chartered Accountant.

The audit report in Form No.10B duly signed and verified and setting forth such particulars as may be prescribed, is to be submitted along with the return of income for the relevant assessment year.

### **Submission of Annual Return**

Every charitable organisation is required to file a return of income in the prescribed Form ITR 7 every year on or before the due date if the total income exceeds the maximum amount, which is not chargeable to income tax.

### **Certificate for Tax Deducted at Source**

Every non-profit organisation deducting tax at source shall furnish to the person on whose behalf tax is deducted, a certificate to the effect that the tax has been deducted. The certificate should specify the amount so deducted, the rate at which tax has been deducted, and such other particulars as prescribed in Form No.16 for salaries and Form

No.16A for other deductions. These certificates can be issued by the employer/payer on his letterhead or on an ordinary paper.

Any Tax deducted has to be deposited with the Government within 7 days after the end of the month in which the tax is deducted.

Quarterly return of TDS has to be filed within 15 days of the end of the quarter.

### **Compliances under Companies Act, 2013**

Following inputs to be provided by this Foundation to the CSR committee for above compliance:

- Present its yearly budget to the CSR committee of GPL
- Report to the CSR Committee of GPL on monthly basis, the actual expenses against budget
- Report on the entire project plan with implementation schedules
- Report in the format as specified in the Companies Act

## Financial Management

### Roles & Responsibilities

#### *The Board of Trustees of this Foundation:*

The Board of Trustees will undertake all actions required in order to satisfy the following tasks needed to be undertaken by the CSR committee (or the funding organization as the case may be):

Approve the projects which the company wants to sponsor for which it will require the detailed phase-wise breakup of the project with identifiable milestone/achievement at the end of each phase with the funds requirement & period of completion;

Define financial reporting methods to be adopted by the Foundation (executive of this Foundation); The committee will receive annual budgets, consider availability of funds for the same, discuss and approve or suggest amendments to the same;

The committee will review periodic reports and consider requests for revisions, if any;

The committee will also establish methods of controls (which help this Foundation function in an efficient and orderly manner) to ensure proper monitoring of the project as per sanctioned plan, adherence to policies, safeguard assets and secure records;

The committee may appoint professionals to audit the project on regular basis to ensure the various controls are in place & implemented. Further the committee may appoint qualified accountant to verify the amount spent on the project against the sanctioned amount (will establish an audit committee with clearly defined roles and responsibilities);

The committee will define limits for authority to the executive for approval/sanction of expenses).

#### *The executive of this Foundation:*

The executive, represented by the head of this Foundation, will prepare and present to the Board of Trustees reports (plans/budgets/updates, etc) as defined by them, on an annual and periodic basis for its due consideration; The executive will ensure all expenses are as per plan; The executive will ensure integrity of records and provide all required support for the process of audit.



## **Resource Planning & Budgeting**

Planning to be in sync with strategic objectives.

This Foundation will have a one year fully cost based operational plan in addition to a 3-5 year strategic plan.

## **Financial Reporting**

The Board of Trustees will receive monthly reports, both performance and financial, for its review. In the event that this Foundation were to receive funds from any other agency/organization, the desired reporting formats for that organization will be followed.

## **Financial Controls**

The Board of Trustees will also establish methods of controls to ensure the proper monitoring of the activities of the Foundation. They may appoint professionals to audit the activities on regular basis to ensure the various controls are in place & implemented. Further the committee may appoint qualified accountant to verify the amount spent on the projects against the sanctioned amount.

## **Transparency, Accountability & Control**

### **Transparency**

Information regarding the activities of this Foundation will be disseminated via one or more channels in the public domain such as - the internet, annual statements, parent organization CSR reports, other reports published by the parent organization, or through media.

Policies applicable to employees will be clearly communicated, in writing at the time of employment and any changes thereafter in a prompt manner.

Appraisals to whomsoever they apply would be conducted in a consultative manner and copies of the same provided to the appraisee.

### **Accountability**

The head of this Foundation is responsible to the Board of Trustees. Annual budgets, Project plans and Strategic partnerships would be presented to the Board of Trustees for suggestions and approvals. The Board of Trustees will also be presented with monthly reports on status of activities, future plans and any other significant development of note.

The employees, retainers and consultants working with the Foundation would be responsible to the head of this Foundation and in turn present plans and status reports on a periodic basis.

All services delivered to the beneficiary population would have outcomes clearly defined.

All agreements with partners and vendors would also have clearly defined role responsibilities.

### **Control**

Financial controls are defined under section in this document on Financial Management. Appraisal systems will act as the first line of control for internal & external accountability. Information such as feedback on delivered services, goal attainments vis-a-vis plans, etc will be an integral part of the appraisal mechanism.

Monthly reporting to the Board of Trustees to include compliance with approved plans.



## Advisory Committee

An advisory committee comprising of at least 3 independent experts to be consulted periodically for inputs on the Foundations plans and progress.

At least  $\frac{2}{3}$  of this committee to be constituted of persons of high repute, related to sport.

This committee to meet annually, together with the CSR committee of the organization and head of the Foundation. Note from this annual meeting to be considered while drafting the annual report of the Foundation. Quarterly interactions between the members of this committee may be facilitated over email/web chat/conference calls, etc.

## **Athlete's Participation, Involvement & Care**

The young (potential) athlete will always remain the primary beneficiary of all activities of this Foundation.

All service outcomes to include expected benefit to the above target beneficiary population.

Activities such as events, competitions, training, education, etc will be designed to provide equal opportunities for all qualifying athletes to participate. These will also be conducted so as to assist the athletes in achieving their goals in an efficient manner. Principles of fair play will be adhered to.

Strong and widespread anti-doping initiatives will be undertaken with the athlete as well as with parents & coaches.

Injury prevention will form an important principle when designing and conducting any activity.

Ethical principles defined in the section "Integrity & Ethics" are designed to protect athletes from sexual misconduct.

## **Integrity and Ethics**

### **Anti-doping**

Strong and widespread anti-doping measures across all sections of populations within the sport of swimming to be undertaken to ensure ethical, fair and healthy participation.

Awareness and education for all participating populations, including athlete, parents, coaches and officials to be implemented as a strong preventive measure.

A highly standardized (reliable and valid) system of testing to be implemented at all competitions where this Foundation participates. Independent, accredited agency capable of providing accurate and prompt results to be engaged for the purpose.

Any person representing this Foundation, if found to be involved in any way with illegal doping practice, will face immediate suspension from all engagements with this Foundation without compensation and if found to be guilty will face immediate termination from all engagements with this Foundation without compensation. The matter will further be referred to the Ethics Panel who may suggest further appropriate penal and other actions.

### **Sexual Harassment**

The current law of the land which governs sexual harassment is the “*Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013*”. This covers, among others, non-governmental organizations, sports organizations, sports complex, etc.

All actions by employees, consultants and retainers of this Foundation will ensure respect for all both in intent and actions.

The detailed Policy against Sexual Harassment is attached hereto as Annexure A.

Practical guidelines for behaviour to be clearly communicated to all those interacting with the athlete on behalf of this Foundation.

All complaints in this regard would be dealt as mentioned in the Policy against Sexual Harassment.

Although the law mandates Sexual Harassment Policy to be applicable for women, the Foundation hereby adopts the Sexual Harassment Policy Annexure A to be applicable to all male employees also in addition to women Employee (as defined in the said Policy) and the term

“Women” shall, wherever it appears in the Sexual Harassment Policy, be read as being applicable to “Male” Employee (as defined in the said Policy) also.

### **Interactions - Internal or External**

Honesty and Integrity will form the basis of all/any interactions undertaken by persons representing this Foundation.

Other values such as sportsmanship, collaboration, trust, self-respect & human dignity will form the broad framework of such interactions.

All actions will be in keeping with the goals of this Foundation.

All conflicts will be resolved in a fair, transparent and objective manner. Principles of natural justice will be followed when undertaking any disciplinary actions.

### **Whistle Blower Policy**

Complaints with regard to any unethical conduct (except for complaints related to Sexual Harassment which will be dealt with as per the Sexual Harassment Policy) by persons representing this Foundation will be duly investigated by the Ethics Panel.

A contact for the Ethics Panel will be prominently communicated via the Foundation’s website.

Full confidentiality will be accorded to the person presenting the complaint.

### **Conflict of Interest**

In the event of a potential conflict of interest and disclosure, the subject employee of this Foundation will immediately bring the issue to the notice of his/her superior and/or the President of the Foundation for appropriate guidance on this matter.

### **Equal Opportunity**

Engagement with this Foundation either as an employee or retainer/consultant will be purely on principles of meritocracy.

Participation in all programs of this Foundation will be as per existing guidelines of the sport and/or the national federation.

All awards offered by this Foundation will be based purely on merit. Objective criteria for which would be clearly defined in advance of the evaluation/selection.

### **Ethics Panel: Constitution and Role and Responsibility**

#### **Constitution:**

The Ethics Panel shall consist of the following 3 members:

- a. Presiding Officer: A Trustee of the Foundation. If a Trustee is not available, the Trustees of the Foundation may appoint any Senior Level employee of Glenmark Pharmaceuticals Limited to act as the Presiding Officer;
- b. One senior member from amongst the employees of the Foundation; If such member(s) is not available, the Trustees of the Foundation may appoint any Senior Level employee of Glenmark Pharmaceuticals Limited to act as such member;
- c. One member to be nominated by the Chairman & Managing Director of Glenmark Pharmaceuticals Limited.

The names of Ethics Panel Members (including any changes thereto) will be intimated separately.

#### **Role & Responsibility of Ethics Panel:**

- a. To ensure that all acts of the Foundation are run in an ethical and honest manner
- b. To address any complaints received under this Governance Handbook.
- c. Direct that any investigation (internal or external) be undertaken.
- d. Take necessary action based on the investigation report.
- e. The Ethics Panel will review & monitor any follow up actions arising out of the complaints and discuss the actions that have been taken and/or need to be taken.
- f. The Ethics Panel will monitor and review all pending cases at their meetings and provide necessary directions from time to time.

#### **Complaint Mechanism**

- a. A complaint can be made to the Ethics Panel in writing through email or letter or by meeting in person.
- b. Upon receipt of a complaint or suo moto the Ethics Panel may direct an investigation (internal and/or external) to be conducted. The Ethics Panel shall have a right to conduct the investigation on its own.
- c. All investigations shall be conducted by giving all parties every reasonable opportunity to defend its case and principles of natural justice shall be applied.

- d. The Ethics Panel can call for any information to investigate the case.
- e. The Ethics Panel can call for any person to clarify on the investigation and/or complaint.
- f. The Ethics Panel can call for any member of the investigation team to clarify on the investigation (including the Investigation Report) and/or complaint.
- g. The Investigation Report shall be forwarded to the Ethics Panel which shall decide on the penalty recommended in the Investigation Report.
- h. The parties to the complaint shall have a right to request for a review by the Ethics Panel.

The Investigation Report and all proceedings and documents of the Ethics Panel shall be kept confidential by the Investigation Team and Ethics Panel. In the event the employee against whom the investigation has been undertaken requests he/she would be provided only a brief summary of the Investigation Report.

If Ethics Panel determines the offence to be a specific offense under the Indian Penal Code or under any other law, the Ethics Panel may recommend and the Foundation shall initiate appropriate action in accordance with law by making a complaint with the appropriate authority.



## **Relations with Strategic Partners, Sports Federations and Government bodies**

Due diligence would be conducted before engaging in formal relationships with any other organization.

Wherever possible, relationships with strategic partners, sports federations and government bodies will be formalized via clearly defined, written agreements. All such relationships will be based on ethical principles defined in this document.

## ANNEXURE A

### Policy against Sexual Harassment

#### 1. Policy and Intent

To provide protection against sexual harassment of women at Workplace and for the prevention and redressal of complaints of sexual harassments and related matters at the Workplace.

#### 2. Coverage

The policy shall be applicable to all Glenmark Aquatic Foundation (“**Foundation**”) Workplace.

#### 3. Effective: 1<sup>st</sup> January 2015

#### 4. Definition:

##### a. Sexual harassment:

Sexual harassment includes any one or more of the following unwelcome acts or behaviour (whether directly or by implication), such as:-

- physical contact and advances; or
- a demand or request for sexual favours; or
- making sexually colored remarks; or
- showing pornography; or
- sharing lewd jokes or stories without consent; or
- any other unwelcome physical, verbal or non-verbal conduct of sexual nature.

Prevention of sexual harassment:

The following circumstances, among other circumstances, if it occurs or is present in relation to or connected with any act or behavior of sexual harassment may amount to sexual harassment:

- implied or explicit promise of preferential treatment in her/his employment/engagement; or
- implied or explicit threat of detrimental treatment in her/his employment/engagement; or

- implied or explicit threat about her/his present or future employment/engagement status; or
- interference with her/his work or creating an intimidating or offensive or hostile work environment for her/him; or
- humiliating treatment likely to affect her/his health or safety.

**b. Employee:**

Means a person employed and/or engaged as an employee, retainer, consultant, trainer, student, trainee or in any other capacity directly with the Foundation working/engaged on voluntary basis or otherwise.

**c. Workplace:**

Means office and/or location where the activities of the Foundation take place and includes location where the Foundation undertakes any activities in furtherance of its objects.

**d. Management:**

Management refers to the Board of Trustees and/or Ethics Panel and/or a person who is empowered to take decision with regards the employability/engagement of an individual in the Foundation.

**e) Complaints Committee:**

**Internal Complaints Committee:**

The Internal Complaints committee shall consist of the following:

- a. Presiding Officer: A woman Trustee of the Foundation. If a woman Trustee is not available, the Trustees of the Foundation may appoint any Senior Level female employee of Glenmark Pharmaceuticals Limited to act as the Presiding Officer;
- b. Not less than three members from amongst the employees preferably committed to the cause of women or who have had experience in social work or have legal knowledge; If such member(s) is/are not available, the Trustees of the Foundation may appoint any Senior Level employee of Glenmark Pharmaceuticals Limited to be such members;
- c. One member from amongst non- governmental Organisation or associations committed to the cause of women or a person familiar with the issues relating to sexual harassment.

If required, each office/location will have its own local Internal Complaints Committee to address complaints arising out of sexual harassment. The members of the Corporate Internal Complaints Committee will be common across all offices. The local Internal Complaints Committee shall have representatives from HR and the line functions.

The names of Internal Complaints Committee Members (including any changes thereto) will be intimated separately.

Presiding Officer (Chairperson) and every Member of Internal Complaints Committee shall hold office for a period of 3 years.

## **5. Preventive Steps**

The Foundation will ensure appropriate conditions in respect of work, leisure, health and hygiene. Further, it will ensure that there is no hostile environment towards women and men at the Workplace and no Employee male or female should have reasonable grounds to believe that he/she is disadvantaged in connection with her/his employment/engagement.

## **6. Complaint Mechanism:**

It is in the Employee's interest to directly inform the harasser that the conduct is unwelcome and must stop. The employee can take the following steps to report any perceived harassment:

- The complaint can be made in writing during or after work hours.
- Report any perceived harassment to any member of the Internal Complaints Committee.
- Employee can use one of the following listed mechanisms to report the matter:
  - a. By sending an email to [governance@glenmarkaquatic.org](mailto:governance@glenmarkaquatic.org)
  - b. By informing telephonically, followed by an e-mail
  - c. By personally meeting the members of the Internal Complaints Committee inside or outside the office premises during or after office hours.

## **7. Powers of the Committee**

### **a. Advising the management:**

- The Internal Complaints Committee will periodically brief the Management regarding any new amendments and case laws.

## **b. Awareness**

- Guidelines should be prominently informed to create awareness of the rights of male and female Employees.
- The Internal Complaints Committee will conduct training periodically; the training will aim to create awareness of this Policy.
  - The Internal Complaints Committee will work on designing various communications that will create awareness of sexual harassment.

## **c. Investigation**

- Upon receipt of a complaint, the Internal Complaints Committee will inform the complainant that a formal enquiry will be conducted.
- A statement of allegations would be sent to the accused with an opportunity to respond in writing within 3 working days.
- The complainant will be given a copy of the written statement of the accused.
- Complainants and accused can request to call for witnesses within the organization.
- The Internal Complaints Committee will give both parties every reasonable opportunity to defend their respective cases.
- The enquiry would be completed as soon as is reasonably possible.
- In case the allegations by the complainant are found to be untrue, the Internal Complaints Committee will recommend strict action against the complainant that may include termination of service/engagement.
- The Internal Complaints Committee based on the merit of the case will make its recommendations to the Management.

## **8. Functions of the Internal Complaints Committee**

- a. The Internal Complaints Committee will meet once every quarter.
- b. The Internal Complaints Committee will review the complaints register and discuss the actions that have been taken.
- c. The Internal Complaints Committee will review all pending cases.
- d. The Internal Complaints Committee will investigate the case, draw facts and recommend suitable action.
- e. The Internal Complaints Committee will talk to the person making the complaint and try to resolve the issue.
- f. The Internal Complaints Committee can call for any information to investigate the case.
- g. The Internal Complaints Committee can call for witness to justify the investigation.
- h. A book shall be maintained to record the minutes of the meeting.

## **9. Procedure for disciplinary action:**

- a. Any aggrieved person should file a complaint before the Internal Complaints Committee as early as possible but not later than 3 months from the date of occurrence of the alleged incident and in case of a series of incidents, within a period of three months from the date of the last incident.
- b. The complaint shall contain all the material and relevant details concerning the alleged sexual harassment including the names of the contravener and the complaint shall be addressed to the Internal Complaints Committee.
- c. If the complainant feels that he / she cannot disclose his / her identity for any particular reason the complainant shall address the complaint to the Internal Complaints Committee and hand over the same in person or in a sealed cover.
- d. The Internal Complaints Committee shall take immediate necessary action to cause an inquiry to be made discreetly or hold a formal inquiry, if necessary.
- e. The Internal Complaints Committee shall after examination of the complaint submit its recommendations to the Management recommending a penalty to be imposed if deemed fit.
- f. The Management of the Organization shall confirm with or without modification the penalty recommended after duly following the prescribed procedure.

## **Third Party Harassment**

Where sexual harassment occurs as a result of an act or omission by any third party or outsider, the employer and person in charge will take all steps necessary and reasonable to assist the affected person in terms of support and preventive action.

## **10. Leave during pendency of enquiry:**

During the pendency of enquiry, on a written request made by the aggrieved, the Internal Complaints Committee may recommend the following:

- Transfer of the aggrieved woman or the respondent to any other Workplace; or
- Grant leave to the aggrieved upto a period of three months; or
- Grant such other relief to the aggrieved on a case to case basis.

The leave granted, if any would be over and above the otherwise entitled leaves.

## **11. Criminal Proceedings:**

If Sexual harassment constitutes to be a specific offense under the Indian Penal Code or under any other law, the Foundation shall initiate appropriate action in accordance with law by making a complaint with the appropriate authority.

## **12. Escalation Process:**

If the Employee concerned is not satisfied with the process or the resolution then he/she can escalate the matter in the following order:

- i. Trustees of the Foundation
- ii. Appeal to Court

## **13. Miscellaneous:**

- a. Any employee having a relationship with another employee in the organization needs to declare the same along with the other employee to their local representative/s. The names and identity of these individual employees will be kept confidential.
- b. The Complainant and the accused can appeal to the competent authority as mentioned in point 12 to review the case.
- c. All members including the external representative shall be present for the meeting
- d. The Internal Complaints Committee must prepare an annual report giving full account of its activities which will be sent to the Management, who will forward it to the Asst. Labour Commissioner.
- e. Important rules to be observed by the committee:
  - Nobody can be condemned without being heard.
  - The judge must be impartial and act fairly and in good faith.
  - All harassment complaints will be treated with the utmost confidentiality to the extent possible. Reprisal by any Employee or manager against any Employee or corroborating witness in harassment complains will not be tolerated.
  - It may also be noted that no complaint will be entertained if it is out of personal vengeance/rebellion (attitude) occurring in the Workplace. If such complaints are received it will be endeavor of the Internal Complaints Committee to take a fair and justified approach of the same. This could be done with the help of witness who are neutral employees from different departments but preview to such rebellious act. Where the Internal Complaints Committee arrives at a conclusion that the allegation against the respondent is malicious or the aggrieved woman or any other person making the complaint has made the complaint knowing it to be false or the aggrieved woman or any other person making the compliant has produced any forged or misleading document, it may recommend the Foundation to take action against the

- woman or the person in accordance with the provisions of the services applicable or in such manner as may be deemed fit.
- Timelines for complaints and inquiry:
    - ✓ A written complaint has to be filed by the female Employee within 3 months of the date of the incident;
    - ✓ The Inquiry has to be completed within 90 days;
    - ✓ The Inquiry report has to be issued within 10 days from the date of completion of inquiry;
    - ✓ The Foundation is required to act on the recommendations of the committee within 60 days of receipt of inquiry report;
    - ✓ Appeal to court against the decision of the committee is allowed within 90 days of the date of recommendations.

#### **14. Power to Amend**

The Trustees at its own direction may make changes in this policy as it deems fit from time to time.