



CROWN CONSULTANTS PRIVATE LIMITED

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PREVENTION OF SEXUAL HARASSMENT POLICY

Prepared by: Indradev Yadav (Compliance Officer)

PURPOSE AND OBJECTIVE:

This policy is formulated in accordance with the provisions of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 ("POSH Act") to ensure a safe and respectful work environment for all employees, free from sexual harassment.

SCOPE:

This policy applies to all employees (permanent, temporary, contractual, or trainees) of CROWN CONSULTANTS PRIVATE LIMITED, including those associated with third parties (vendors, consultants, clients) within the workplace.

DEFINITION OF SEXUAL HARASSMENT:

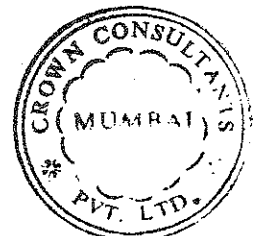
Sexual harassment includes any unwelcome act or behaviour (direct or implied) such as:

- Physical contact and advances
- Demand or request for sexual favours
- Making sexually colored remarks
- Showing pornography
- Any other unwelcome physical, verbal, or non-verbal conduct of a sexual nature

INTERNAL COMPLAINTS COMMITTEE (ICC):

To address complaints of sexual harassment, the company has constituted an Internal Complaints Committee (ICC) as per the POSH Act. The ICC comprises:

- Presiding Officer: A senior female employee
- Two Members: From amongst employees committed to the cause of women's welfare or having experience in social work/legal knowledge
- External Member: From an NGO or an expert familiar with sexual harassment issues



The ICC shall maintain confidentiality, ensure impartial investigations, and provide recommendations for resolving complaints.

COMPLAINT PROCEDURE:

1. **Filing a Complaint:**

- Any aggrieved individual may file a written complaint to the ICC within 3 months from the date of the incident.
- In case of ongoing harassment, the complaint can be filed within 3 months from the last incident.

2. **Acknowledgment:**

- The ICC shall acknowledge receipt of the complaint within 7 days.

3. **Preliminary Inquiry:**

- The ICC will conduct an initial inquiry to determine if the complaint is within its purview.

REDRESSAL PROCESS:

1. **Inquiry Process:**

- The ICC will initiate a formal inquiry within 90 days of receiving the complaint.
- Both the complainant and the respondent will be given equal opportunity to present their case.

2. **Recommendations:**

- Based on the findings, the ICC may recommend corrective actions, including but not limited to:
 - Apology, warning, or counseling
 - Suspension or termination of the respondent
 - Compensation to the aggrieved party

3. **Action Taken:**

- The company will implement the ICC's recommendations within 60 days.

CONFIDENTIALITY:

All complaints, inquiries, and records related to sexual harassment shall be kept confidential, except where disclosure is required by law.



RETALIATION:

The company strictly prohibits retaliation against any individual who reports sexual harassment or participates in the inquiry process.

AWARENESS AND TRAINING:

- Regular training programs will be conducted to educate employees about the prevention of sexual harassment and the complaint process.
- Posters and materials summarizing the POSH Act will be displayed in prominent locations.

FALSE COMPLAINTS:

If a complaint is found to be malicious or false, the ICC may recommend appropriate disciplinary action against the complainant.

AMENDMENTS:

The company reserves the right to amend this policy at any time to comply with changes in the law or organizational requirements.

CONTACT DETAILS OF THE ICC:

For filing complaints or seeking guidance, employees may contact

Email: compliance@crownsec.com

This policy reflects CROWN CONSULTANTS PRIVATE LIMITED commitment to ensuring a safe, inclusive, and harassment-free workplace for all employees.

*The Management reserves the right to modify / change/ withdraw any part or whole of the Policy contents without assigning any reason with or without notice at any time at their sole discretion.



