

**JARO POLICY ON SEXUAL HARASSMENT OF WOMEN AT THE WORKPLACE
KNOWN AS "JARO POSH POLICY"**

1. Preamble

This policy has been framed in accordance with the provisions of "The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013" and rules framed thereunder (hereinafter "the Act"). Accordingly, while the policy covers all the key aspects of the Act, for any further clarification, reference shall always be made to the Act, and the provisions of the Act shall prevail. Jaro Institute of Technology Management and Research Limited (hereinafter "Jaro") provides equal employment opportunity to all its employees and is committed to creating a healthy working environment that enables employees to work without fear of prejudice, gender bias and sexual harassment. The sexual harassment of a woman results in violation of her fundamental rights to equality under Articles 14 and 15 of the Constitution of India and her right to life and to live with dignity under Article 21 of the Constitution of India and right to practice any profession or to carry on any occupation, trade or business which includes a right to a safe environment free from sexual harassment. Jaro, as a responsible corporate, does not tolerate any form of harassment or discrimination.

The protection against sexual harassment and the right to work with dignity are universally recognised human rights by international conventions and instruments such as the Convention on the Elimination of all Forms of Discrimination against Women (CEDAW), which has been ratified on the 25th June, 1993 by the Government of India. It is expedient to make provisions for giving effect to the said Convention for the protection of women against sexual harassment at the workplace.

The "Policy on Prevention of Sexual Harassment of Women at Workplace", Jaro Institute of Technology Management and Research Limited, intends to provide protection against sexual harassment of women at the workplace and the prevention and redressal of complaints of sexual harassment and matters related to it.

2. The Related Indian Law

No employee employed with the company shall engage in any act of sexual harassment against women employees of Jaro Institute of Technology Management and Research Limited or partner organisations of Jaro, consultants, service providers, contractors, interns, visitors, etc (referred to as "women"). The occurrence of any such act is treated as gross misconduct and shall be punishable in accordance with the Disciplinary Policy of the Company.

In compliance and in accordance with Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and its Rules, (referred to as "Act") for providing protection of women as referred herein above against sexual harassment at its workplaces, and for prevention, prohibition and redressal of complaints of sexual harassment, and for matters connected therewith or incidental thereto, the present policy of the company regarding sexual harassment of women at workplace shall govern and would be made applicable.

3. Scope

This Policy shall deal with all allegations/complaints of Sexual Harassment committed by an Employee(s) against a woman as referred to herein above, irrespective of whether Sexual Harassment is alleged to have taken place within or outside the Company premises, but that constitutes the workplace.

All Complaints in connection with alleged Sexual Harassment of women will be addressed in compliance with and in accordance with the provisions of the Sexual Harassment at Workplace (Prevention, Prohibition and Redressal) Act 2013.

4. Definitions:

4.1 "Employee" for the purpose of this policy, an employee is a person employed at Jaro payroll or person deployed 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 coworker, a contract worker, probationer, trainee, apprentice or by any other such name.

4.2 "Employer" means any person responsible for the management, supervision, and control of the workplace.

4.3 "Aggrieved woman": 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 and including contractual, temporary, or visitor.

4.4 "Respondent": A person against whom a complaint of sexual harassment has been made by the aggrieved woman.

4.5 "Workplace": In addition to the place of work, all other offices and premises such as Head office / Branch offices, regions, or other premises where Jaro business is conducted, including any place visited by the employee arising out of or during employment, including transportation provided by Jaro for undertaking such a journey. It shall also include any place where the aggrieved woman or the respondent visits in connection with his/her work/meeting, during and/or arising out of employment/ contract/ engagement with Jaro Institute of Technology Management and Research Limited, including transportation provided for undertaking such a journey.

Explanation: For the purposes of clarification, "Management" includes the person nominated by the board or committee responsible for the formulation and administration of policies for the organisation.

4.6 "Sexual Harassment"

a) Sexual harassment is unwanted conduct of a sexual nature. Physical conduct of a sexual nature includes all unwanted physical contact.

b) Verbal forms of sexual harassment include unwelcome innuendoes, suggestions and hints, sexual advances, comments with sexual overtones, objectionable sex-related jokes or insults or unwelcome graphic comments about a person's body made in their presence or directed toward them.

c) Any other unwelcome physical, verbal, or non-verbal gesture or conduct of a sexual nature or inappropriate inquiries, and unwelcome whistling directed at a person or group of persons.

d) Non-verbal forms of sexual harassment include unwelcome gestures, indecent exposure, and the unwelcome display of sexually explicit pictures and objects in any media.

The sexual harassment would also mean in 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, as defined above and an act that constitutes sexual harassment within the meaning of Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013:

- (i) Implied or explicit promise of preferential treatment at work; or
- (ii) Implied or explicit threat of detrimental treatment at work; or
- (iii) Implied or explicit threat about present or future employment status; or
- (iv) Interference with work or creation of an intimidating or offensive work environment; or
- (v) Humiliating treatment is likely to affect health, safety or self-esteem.

Note: All acts of sexual harassment by an employee of the company at the workplace, to a woman who may or may not be an employee of the company, would come within the meaning of Sexual Harassment of Women within the meaning of this policy.

4.6.1. "Virtual Sexual Harassment"

Jaro has moved to a virtual workspace, be it staying in touch via smartphones or web callings, etc. With this change in the work environment, it is essential that the employees and managers conduct in a professional manner all such virtual interactions as well. A few of the guidelines on virtual interaction are as below

Do's:

1. Proper Attire - Employees attending video conferences must be dressed appropriately as expected in a professional environment.
2. Content of Conversation - Keep the conversation specific to work areas, projects, and deliverables.

Don'ts:

1. Employees should not attend video conferences wearing dresses such as vests, shorts, T-shirts with suggestive phrases, etc.

2. The background of the video call should be suitable. No poster with suggestive content or any other element should be visible during the video calls.
3. No inappropriate jokes should be made.
4. Managers must not insist that female colleagues log on to one-on-one video calls but have the option to take calls in "audio-only" mode.
5. Late-night video calls to be avoided. If it is a business emergency, then the employee can attend it on "audio only mode".

5. Policy Statement

- a) All Jaro employees will maintain high standards of dignity, respect, and positive regard for one another and with all those to whom this policy is applicable, in all their dealings.
- b) All Jaro employees will understand and appreciate the rights of the individual to be treated with dignity.
- c) All Jaro employees are required to maintain a work environment that is free from any kind of harassment.
- d) Jaro employees will refrain from committing any acts of sexual harassment at the workplace.
- e) Allegations of sexual harassment will be dealt with seriously, expeditiously, sensitively and with confidentiality.
- f) Jaro employees will be protected against victimisation, retaliation for filing or reporting a complaint on sexual harassment and will also be protected from false accusations.

6. Process

Internal Complaints Committee (ICC)

The Internal Complaint Committee shall comprise as many members as the management may nominate from time to time, provided that at least one-half of the total number of Members shall be women.

The present Members of the ICC shall comprise the following:

- (i) One Presiding Officer who shall be a senior-level woman employee of the Company;
- (ii) Two employee members, preferably committed to the cause of women or who have experience in social work or have legal knowledge;
- (iii) One outside member from amongst a Non-Government Organisation or Association committed to the cause of women or a person familiar with the issues relating to sexual harassment, whose fee shall be fixed by the management and revised from time to time.

(iv) Each member of the Internal Complaints Committee shall hold the position for three (3) years from the date of nomination.

(v) The Presiding Officer or the members can be removed from the Internal Complaints Committee due to contravention of any of the provisions of the Act or other disqualifications as defined in the Act:

The ICC shall, under the authorization of the board of directors or committee responsible for formulation and administration of policies for the organization or any other Senior officer or Director/ Managing Director nominated by the board or committee, have the power to sub-delegate their authority to a sub-committee of ICC for monitoring the local issues at Manufacturing Units/ Functional Departments of the Company/ establishments.

The Board of Directors may reconstitute the ICC as may be required from time to time, within the stipulated requirements under the Act.

7. Grievance Procedure

a) An aggrieved woman ("Complainant") may lodge a complaint of Sexual Harassment ("Complaint") against an ("Respondent") who could be an employee or anyone else upon whom this policy is applicable, with any of the members of the Panel or through whistle Blower platform within time not later than three months from the date of occurrence of the alleged incident.

However, it is expected

b) that any such matter must be reported as early as possible to the Internal Complaint Committee without any delay in the larger interest of justice.

c) If the Complainant feels that she cannot disclose her identity for any reason to the Panel members, she can address the complaint to the Managing Director/Whistle-blower officer of the Company or management, whereupon the process shall be undertaken in accordance with law.

d) Such a Complaint shall necessarily be in writing or video her email and the Complainant shall sign at the foot of each page of the Complaint.

e) The Complaints Committee will hold a meeting with the Complainant within a period of seven days of the receipt of the complaint, and advance intimation in writing will be given to the Complainant of the same. However, in the event the complaint does not fall under the purview of Sexual Harassment or the Complaint on the face of it does not disclose an element or offence of Sexual Harassment, the Complaints Committee may drop the complaint after recording the reason/s thereof and shall subsequently communicate the same to the Complainant, in writing.

f) A copy of the complaint shall be shared with the Respondent with some advice to submit his/ her reply along with supporting documents and the names and addresses of the

witnesses, within a period not exceeding 10 (ten) working days from the date of receipt of the documents.

g) The Complainant shall be granted an opportunity to record her statement to prove her allegations and may record the statement of an employee as a witness, and produce corroborative material with documents, etc., to substantiate her complaint/ allegations.

h) The Respondent shall be granted an opportunity to record his/ her statement and produce evidence in his/ her defence.

i) The Internal Complaint Committee have the right to close the inquiry proceedings or to give an ex parte decision on the complaint, if the Aggrieved (complainant) or Accused (respondent) fails, without sufficient cause, to present herself or himself for 3 consecutive hearings convened by the Presiding Officer, as the case may be, provided that such termination or ex-parte order may not be passed without giving a notice in writing, 15 (fifteen) days in advance, to the party concerned in case the complaint made by the complainant is found to be false and malafide at any stage, it shall amount to misconduct and the complainant shall be liable for appropriate disciplinary action as per the Service Rules.

k) The Internal Complaints Committee shall complete the "Enquiry" within 90 days from receipt of the complaint and submit its report with its findings to the Management within a period of ten days from the date of completion of the enquiry, and such report be made available to the concerned parties.

l) In case the Complainant fails to prove her allegations made in her complaint, the matter shall stand closed.

m) In case the Respondent is found guilty of the act of sexual harassment as mentioned in the complaint, the management shall take appropriate action against him in accordance with the applicable provisions of law.

n) The parties shall not be allowed to bring in any legal practitioner to represent them in their case at any stage of the proceedings before the Internal Complaints Committee.

o) Any party not satisfied or further aggrieved by the implementation or non-implementation of recommendations made and/or findings of the ICC may appeal to the appellate authority in accordance with the Act and rules, within 90 days of the recommendations being communicated.

8. Procedure for Conciliation

a) The Aggrieved Woman may approach the Committee and choose the option of Conciliation. The Committee, if satisfied that the proposed conciliation is without any undue pressure, influence and without any monetary settlement (e.g. promotion, bonus, financial compensation, etc.) and

b) will resolve the matter, then the Committee, before commencement of the Enquiry, may initiate appropriate steps.

- (i) Recording of such settlement on a written basis of such conciliation agreed by the parties.
- (ii) Where the settlement has been arrived at, the Internal Complaint Committee shall provide copies of the settlement to the aggrieved woman and the respondent. The Internal Complaint Committee shall also provide a copy of the settlement to the employer with a recommendation that no further inquiry is required.
- (iii) If the settlement does not arrive, the ICC must initiate a formal enquiry into the complaint. If the settlement is reached and the Respondent does not comply with its terms, then the complaint committee must proceed with the Enquiry.

9. Essential requirements of a Complaint:

- a) Any aggrieved woman may make, in writing, a complaint of sexual harassment at the workplace to the internal Complaints Committee.
- b) Where the aggrieved woman is unable to make a complaint on account of her physical/mental incapacity, a complaint may be filed by her relative, friend, co-worker or any person who has knowledge of the incident with the consent of the aggrieved woman and/or jointly with her relative or friend.
- c) A complaint must specify the details of the incident in clear language with full particulars.
- d) Date, time and place of the Incident must be clearly and unambiguously mentioned in the complaint.
- e) The complaint must disclose the acts committed by the Respondent in clear and unambiguous terms.
- f) If any specific words have been used or any gesture demonstrated by the Respondent, that must be explained in detail.
- g) The complaint must disclose in whose presence the misconduct has been committed by the Respondent so that those persons could be called as witnesses to verify the alleged incident.
- h) The complaint, if possible, should also mention the material evidence that could substantiate the allegations to enable the Internal Committee to investigate the same in an effective and efficient manner and reach to a just conclusion.

10. Responsibilities of the Management:

The management shall treat sexual harassment as a gross and unacceptable misconduct under the disciplinary policy and act for such misconduct.

The management shall undertake a necessary awareness program and preventive measures against sexual harassment of women at the workplace.

These would include:

- a) Display at any conspicuous place in the workplace a copy of this policy
- b) Organise periodical workshops and awareness programs at regular intervals for sensitising the employees as required under the provisions of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and any other relevant awareness and training programs for women employees.
- c) Organise regular specialised orientation programs for the members of the Internal Committee for dealing with the cases of sexual harassment.
- d) Provide necessary assistance and facilities to the Internal Committee to deal with the complaint and conduct an inquiry.
- e) Make available such information to the Internal Committee as may be required, having regard to the complaint received.
- f) Provide support to the Complainant 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.

11. Responsibilities of the Employees

- a) All employees of the Company have a personal responsibility to ensure that they have read the policy document and adhere to the same.
- b) All employees shall strictly follow the obligations of confidentiality as required in this policy.

12. Manner for taking action for Sexual Harassment

a) In case of allegation proved: Internal Complaint Committee, based on its investigation and findings, arrived at the conclusion that the allegation against the respondent has been proved. It shall recommend to the employer to take any action against the respondent as per the Jaro' service rules, including:

- Written apology
- Warning letter
- Reprimand or censure
- Withholding of promotion
- Withholding of pay rise or increments
- Deduction from salary
- Termination from service

Financial Penalty (In accordance with the mental, physical trauma, loss of career opportunity, and medical expenses) in a lump sum or in instalments

Undergoing a counselling session

- Transfer to another workplace

If the complaint is of a serious nature, involving threats of reprisal or risk of recurrence or refusing the order/judgment of the employer, then a criminal case shall be filed against him/her before the police/court at the discretion of the Complaint Committee.

b) In case of allegation not proved: Where the allegations against the respondent have not been proved, the Internal Complaint Committee shall provide a report to the employer with a recommendation that no action is required, and a copy of the report will be provided to the respondent and the aggrieved woman.

13. Action for Malicious Complaint or False Evidence

a) Internal Complaint Committee, based on its investigation and findings, arrived at the conclusion that the allegation against the respondent is malicious or made the complaint knowing it to be false or has produced any forged or misleading document or witnesses, it shall recommend to the employer to take any action against the complainant as per Jaro's service rules.

b) Failure to provide sufficient information or evidence shall not be considered as a malicious complaint.

c) The Internal Complaint Committee shall ensure that the victim or witnesses are not victimised 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.

14. Confidentiality:

The contents of the complaint, the identity and addresses of the aggrieved staff member, respondent and witnesses, any information relating to conciliation and inquiry proceedings, findings of the Internal Committee and the action taken by management of Jaro Institute of Technology Management and Research Limited shall not be published, communicated, or made known to the public, press and media in any manner. All complaints/grievances of sexual harassment will be taken seriously, will be held in strict confidence, and will be investigated promptly in an impartial manner. For completing the investigation, key witnesses or other stakeholders may be required to be taken into confidence at the strict discretion of the Internal Committee.

15. Applicability.

The Policy shall already be operational, and this revision shall become operational from 29th August, 2025.

16. Internal Complaints Committee (ICC) Composition:

To ensure a more standardised, impartial, and streamlined approach in addressing and resolving issues related to sexual harassment at the workplace, the management has decided to restructure the Internal Complaints Committees and constitute a single Central ICC, which

will cover all the regions. The Internal Complaints Committee shall be comprised of one core committee.

INTERNAL COMPLAINTS COMMITTEE (ICC)

The Central Committee (Core Committee) shall consist of the following committee members:

Presiding Officer:

Ms. Ramalika Anup Tharchandi - Manager, Operations

Members:

1. Mr. Sushant Mallya – Vice President (HR),
2. Ms. Shraddha Jadhav – Manager - Backend Operations
3. Ms. Ankita Yogendra Singh – Manager - Operations
4. Mr. Mehul Joshi – (External Member)

All complaints received from the corporate office, any region-related party shall be dealt with in accordance with law by the aforesaid committee at its Registered office, 11th Floor, Vikas Centre, Dr. C.G. Road, Chembur East, Mumbai - 400074.

- Further, as also required by the law, to prevent the possibility of any undue pressure or influence, the Internal Committee shall have an external member who is familiar with the issue of sexual harassment.
- The minimum quorum out of the 5 members (including the Chairperson), three members are required for conducting all the proceedings in respect of the Sexual harassment cases.
- In the event any member of the aforesaid committee ceases or exits its association with the Company for whatever reason, the Management shall appoint a replacement of the same within 30 days thereof. Further, if a member wishes to voluntarily resign from the Complaints Committees, he/she shall submit their resignation to the Management.
- The Presiding Officer (Chairperson) and every Member of the Internal Committee shall hold office to a maximum period of three years, from the date of their nomination.
- The External member of the committee shall be paid such fees or allowances for holding the proceedings of the Internal Committee, as may be agreed between the management and the member.

General Instructions

Protection against Victimization as an interim measure

The Company/management is duty-bound to take appropriate steps to prevent sexual harassment.

- The victim of Sexual Harassment has the option to seek transfer of the perpetrator or her own transfer from one department/branch/station to another. The Aggrieved Woman may seek transfer to another workplace
- The Aggrieved Woman may seek leave for up to 3 months, which will be in addition to the leave she is already entitled to.

Obligation of the Management

The Management of the Company shall provide all necessary assistance to ensure the effective implementation of this policy.

Third Party Harassment

Where sexual harassment occurs because of an act or omission by any third party or an outsider, the Company shall take all steps necessary and reasonable to assist the affected person in terms of support and preventive action.

Annual Report

The Internal Complaint Committee shall prepare in such form and at such time as may be prescribed an Annual report at the end of each Calendar/financial year of the Company, giving a full account of its activities during the previous year and forward a copy thereof, to the Management or the person/committee nominated and forward the consolidated report as mandated under the Act to the concerned Authorities.

Modification and Review of the Policy

The Company reserves the right to modify and/or review the provisions of this Policy, to comply with applicable legal requirements, internal policies, or otherwise with a view to revising the provisions of this Policy to the extent deemed necessary by the Company from time to time. Any such changes or modifications shall be notified by the Company to its employees in due course.

Policy Availability

The Policy will be available to all employees on www.Jaroeducation.com

Mechanisms to Strengthen Implementation of Policy

- a) Communication of policy and making it available to all employees.
- b) Display at any conspicuous place at the workplace the constitution of the Internal Complaints Committee and the penal consequences.
- c) Making it a part of the corporate induction program.
- d) Organise a workshop for the Internal Complaint Committee and an awareness program for employees

Frequently Asked Questions (FAQs)

1) What is sexual harassment?

Sexual harassment is defined as any one or more unwelcome acts or behaviours such as physical contact and sexual advances, a demand or request for sexual favours, making sexually coloured remarks, showing pornography, and any other unwelcome physical, verbal, or non-verbal conduct of a sexual nature.

2) When is conduct unwelcome or harassing?

Unwelcome sexual advances (either verbal or physical), requests for favours and other verbal or physical conduct of a sexual nature constitute sexual harassment when: Submission to such Conduct is either an explicit or implicit act.

Conduct having sexual overtones has the purpose or effect of interfering with an individual's work performance or creating an intimidating, hostile, or offensive work environment.

3) What is not sexual harassment?

Sexual harassment does not refer to occasional compliments of a socially acceptable nature. It only refers to behaviours that are not welcome, that is personally offensive, that debilitate morale, and that, therefore, interfere with the morals and values at work.

4) What are the responsibilities of employees regarding sexual harassment?

Employees are expected to refrain or avoid from engaging in any form of sexual harassment and report incidents promptly to the designated authorities.

5) What happens after an employee reports an incident of sexual harassment?

The organisation will conduct a prompt and impartial investigation into the allegations, respecting the confidentiality of all parties involved. Appropriate disciplinary action will be taken against the employee if the allegations levelled in the complaint are substantiated.

6) Can an employee report sexual harassment anonymously?

While anonymous reports are taken note of for monitoring the Respondent, for undertaking investigation as per this policy, the complaint must be duly signed and or sent through email by the complainant employee with her detailed particulars and information.

7) What protections are available to individuals who report sexual harassment?

Retaliation against individuals who report sexual harassment, the victim or any witness is strictly prohibited in the Company and will result in disciplinary action against the offender.

8) What support services are available to victims of sexual harassment?

The Company provides access to counselling services and other support resources to assist victims in coping with the emotional and psychological effects of sexual harassment.

9) What training programs are in place to prevent sexual harassment?

The organisation conducts regular training sessions to educate employees about the company's policies and procedures regarding sexual harassment prevention, prohibition, and redressal.

10) How does the organisation ensure confidentiality during the investigation process?

The Company takes appropriate measures to maintain the confidentiality of all parties involved in the investigation, to the extent possible, while still conducting a thorough inquiry.

11) What are the consequences of false accusations of sexual harassment? Or what if the complaint filed against me is false?

Any person who files a false and malicious complaint, and or is involved in a conspiracy to file a false or malicious complaint or produces false or misleading documents or evidence and records false evidence, are taken seriously and would be treated as serious misconduct and would result in disciplinary action including termination of the employment against the individual making the false allegations and recording false evidence.

12) Is it only for working women of our Company?

No, it is for every woman, direct or indirect, who may get harassed at our workplace. It could be a visitor, freelancer, consultant, or customer, literally any woman who is visiting our workplace.

13) What if an employee of our Company is accused of sexual harassment by a female employee of another company?

The same would be investigated by the Internal Committee of the Company and would be treated as misconduct as per the disciplinary policy of the company.

14) What should an employee keep in mind while filing a complaint?

A complaint for sexual harassment must be made within 3 months of the incident having taken place, mentioning the name of the alleged person, date, place, narrating the incident in detail, witnesses, also any other information that is intended to be used as evidence in the case.

15) I am afraid that by filing a complaint, I will become the subject of office gossip. Do I have a right against this?

Yes. Both parties to proceedings under this law have the right and an obligation to confidentiality. This means that all information relevant to the case, such as contents of the complaint made, identity and addresses of the parties and the witnesses and specific details about the outcomes of the case cannot be made public by the complainant, the respondent, or any member of the IC committee.

16) If an employee needs any clarification on the policy and the process as provided therein, what should he/she do?

The employee can always contact members of the Internal Complaints Committee or the Human Resource Department to seek any information on this policy. The Company would be conducting regular awareness and training programs to educate employees about their rights and responsibilities under the POSH Policy.

17) In case, during the investigation process, the Complainant or the Respondent wants to bring any employee as a witness or place any record of the management in evidence, what should they do?

They can either bring the concerned employees to the committee to record their evidence. However, in case of any difficulty to do so, they may request the Internal Complaint Committee or the management, who can facilitate the same, subject to the employee requesting the Internal Complaints Committee to facilitate, provided the employee consents to the same. The Internal Complaints Committee can also advise management to provide the required relevant records if available for the purposes of investigation.

18) Should the employee who has been sexually harassed share the details of the incident with any of his/her colleagues?

No. The employee must not share details of the incident with anyone except the Internal Complaints Committee or HRBP/Regional HR. No co-employee, including a manager, should take up or try to resolve the issues that would include speaking to the Respondent or any potential witness, as regards the complaint.

19) What if an employee of my organisation is accused of sexual harassment by an employee of another company/Vendor?

The same would be investigated by the Internal Complaints Committee of that organisation and would be treated as misconduct as per the whistle-blower policy of the company.