

SIR SHADI LAL ENTERPRISES LTD

Policy on Related Party Transaction pursuant to Regulations 23 of SEBI (LODR) Regulations 2015

1. Scope and Purpose of the Policy:

Our Company, Sir Shadi Lal Enterprises Ltd intended to ensure the proper approval and reporting of transactions between the Company and its Related Parties Such transactions are appropriate only if they are in the best interest of the Company and its shareholders. Considering the requirements for approval of related party transactions as prescribed under the Companies Act, 2013 (herein after called "Act") read with the Companies (Meetings of Board and its Powers) Rules, 2014 (herein after called Rules), applicable Accounting Standard and Regulation 23 of SEBI (LODR) Regulation 2015.

Further as per Regulation 23 (1) of SEBI (LODR) Regulation, 2015 a listed company shall have to formulate a policy on materiality of related party transactions and on dealing with related party transactions.

In view of the above, SSLEL has framed this Policy on Related Party Transactions ("Policy"). This Policy has been adopted by the Board of Directors of the Company based on recommendations of the Audit Committee. The Board may amend this policy suo moto, or on recommendations of the Audit Committee from time to time. The Audit Committee would review and amend the Policy, as and when required, subject to adoption by the Board.

2. Definitions

"Act" means Companies Act, 2013

"Accounting Standard" means the Accounting Standard 18, as notified by the ICAI, as applicable on date including any amendment / modification thereto from time to time and /or any other Standard notified by ICAI or any other Authority including MCA, as may be applicable.

"Arm's length price", would have the meaning as defined by the Companies Act 2013, and rules made there under and judicial and other pronouncements, as applicable from time to time and shall means a price which is applied or proposed to be applied in a transaction between persons other than associated enterprises ,in uncontrolled conditions.

"Arm's Length Transaction" - means a transaction between two related parties that is conducted as if they were unrelated, so that there is no question of conflict of interest.

"Associate" means a Company as defined under section 2(6) of the Companies Act, 2013 and as defined by Accounting Standard (AS) 23, "Accounting for Investments in Associates in

Consolidated Financial Statements” and by Accounting Standard (AS) 18, “Related party disclosures”.

“Audit Committee or Committee” means the Committee of the Board formed under Section 177 of the Act and Regulations 18 of SEBI (LODR) Regulations, 2015

“Board” means Board of Directors of the Company.

“Control” means control as defined in Section 2 (27) of the Act and shall have the same meaning as defined in SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011.

“Key Managerial Personnel” shall mean the officers of the Company as defined in Section 2(51) of the Act.

“Policy” means Related Party Transaction Policy.

“Material Related Party Transaction” means a transaction with a related party where the transaction/transactions to be entered into individually or taken together with previous transactions during a financial year, exceeds ten percent of the annual consolidated turnover of the Company as per the last audited financial statements of the Company.

“Related Party” as defined under Regulation 2(zb) of SEBI (LODR) Regulations is as under –

An entity shall be considered as related to the Company if :

- (i) Such entity is a related party under section 2 (76) of the Companies Act, 2013; or
- (ii) Such entity is a related party under the applicable accounting standards.

Section 2(76) of the Companies Act, 2013, as referred above, defines Related Party as —

- (i) A Director or his relative;
- (ii) A Key Managerial Personnel or his relative;
- (iii) A firm, in which a director, manager or his relative is a partner;
- (iv) A private company in which a director or manager is a member or director;
- (v) A public company in which a director or manager is a director and holds along with his relatives, more than two per cent. of its paid-up share capital;
- (vi) Anybody corporate whose Board of Directors, managing director or manager is accustomed to act in accordance with the advice, directions or instructions of a director or manager; [Except advice, directions or instructions given in a professional capacity]
- (vii) Any person on whose advice, directions or instructions a director or manager is accustomed to act.[Except advice, directions or instructions given in a professional capacity]
- (viii) Any company which is a holding, subsidiary or an associate company of such company; or a subsidiary of a holding company to which it is also a subsidiary.
- (ix) A director other than an Independent Director or Key Managerial Personnel of the holding Company or his relative with reference to a Company.

“Relative” : with reference to any person, means who is related to another, if:-

- (i) They are members of a Hindu Undivided Family;
- (ii) They are Husband or wife or
- (iii) One person is related to the another in the following manner, namely:-
 - a. Father, includes step-father.
 - b. Mother, includes step-mother.
 - c. Son includes step-son.
 - d. Son’s wife.
 - e. Daughter.
 - f. Daughter’s husband.
 - g. Brother, includes step-brother.
 - h. Sister includes step-sister.

“Significant influence” as defined by Accounting Standard 18 means participation in the financial and/or operating policy decision of an enterprise, but not control of those policies.

The definitions above said for the observance of the Policy by the Company and its Board (including Committee/s thereof), shall be subject to exercise of the statutory powers of the Regulatory Authorities with respect to repeal or alteration or addition to their respective meaning as prescribed by or under Companies Act 2013, the SEBI Act, and any other applicable laws for the time being in force.

3. Policy:

All Related Party Transactions shall require prior approval of the Audit Committee unless otherwise specifically exempted in accordance with this Policy.

a) Identification of Related Party :

Each director and Key Managerial Personal is responsible for providing notice to the Board or Audit Committee regarding persons and entities to be considered as “related Party” by virtue of his/her being Director/KMP in the entity or holding certain shareholding percentage. Such notice shall be provided to the company at the time of appointment and also at the time of first board meeting in every financial year and whenever there is any change in the disclosures already made.

b) Disclosures

- i) The Company is required to disclose Related Party Transactions in the Board’s Report to shareholders of the Company along with justification for entering into such transactions.
- ii) Details of all Material Related Party Transactions shall be disclosed quarterly along with Company’s Compliance Report on Corporate Governance, in accordance with the Listing Regulations.
- iii) The Company is also required to disclose this Policy on its website and web link will also be provided in the Annual Report of the Company.
- iv) The Company shall keep one or more registers giving separately the particulars of all contracts or arrangements with any related party. This Policy will be communicated to all operational employees and other concerned persons of the Company.

c) Restrictions relating to Related Party Transactions

All Related Party Transactions shall require prior approval of Audit Committee. Further, all Material Related Party Transactions shall require approval of the shareholders through special resolution and the Related Parties shall abstain from voting on such resolutions.

The following transactions will also require prior approval of the shareholders through special resolution.

- i. Sale, purchase or supply of goods or materials, directly or through appointment of agent exceeding 10% of the turnover of the Company or Rs.100 crores, whichever is lower;
- ii. Selling or disposing or purchasing of property of any kind, directly or through appointment of an agent, exceeding 10% of the net-worth of the Company or Rs.100 crores, whichever is lower
- iii. Leasing of property of any kind exceeding 10% of the net-worth of the Company or 10% of the turnover of the Company or Rs.100 crores, whichever is lower;
- iv. Availing or rendering of any services, directly or through appointment of an agent exceeding 10% of the turnover of the Company or Rs.50 crores, whichever is lower;
- v. Appointment to any office or place of profit in the Company, its subsidiary company or associate company at a monthly remuneration exceeding Rs.2,50,000.
- vi. Remuneration for underwriting the subscription of any securities or derivatives of the Company exceeding 1% of the net-worth of the Company.

The Turnover/ Net-worth referred in this clause shall be computed on the basis of Audited Financial statement of the Company in the preceding financial year.

The limits specified in sub-clause (i) to (iv) above shall apply for the transaction(s) during a financial year, either individually or taken together.

The explanatory statement to be annexed to the notice of a general meeting convened pursuant shall contain the following particulars namely:

- a. Name of the related party
- b. Name of the director or key managerial personnel who is related, if any;
- c. Nature of relationship
- d. Nature, material terms, monetary value and particulars of the contract or arrangement
- e. Any other information relevant or important for the members to take a decision on the proposed resolution

4. Review and Approval of Related Party Transactions :

Related Party Transactions will be reported to the Audit Committee for review and approval. Any member of the Committee who has a potential interest in any Related Party Transaction will recuses himself/herself and abstains from a discussion and voting on the approval of the Related Party Transaction(s).

The Audit Committee shall be provided with the material facts of such Related Party Transactions and the Audit Committee will determine whether to approve such Related Party Transactions or not.

In assessing a Related Party Transaction, the Audit Committee shall consider such factors as it deems appropriate, including without limitation –

- i. the business reasons for the Company to enter into the Related Party Transaction;
- ii. the commercial reasonableness of the terms of the Related Party Transaction;
- iii. the materiality of the Related Party Transaction to the Company;
- iv. whether the terms of the Related Party Transaction are fair to the Company and on the same basis as would apply if the transaction did not involve a Related Party; and
- v. the extent of the Related Party's interest in the Related Party Transaction.

The following Related Party Transactions shall not require prior approval of Audit Committee or Shareholders:

- i. Any transaction that involves the providing of compensation to a director or Key Managerial Personnel in connection with his or her duties to the Company or any of its subsidiaries or associates, including the reimbursement of reasonable business and travel expenses incurred in the ordinary course of business.
- ii. Any transaction in which the Related Party's interest arises solely from ownership of securities issued by the Company and all holders of such securities receive the same benefits pro rata as the Related Party.
- iii. transactions entered into between the Company and its wholly owned subsidiary whose accounts are consolidated with the holding company and placed before the shareholders at the general meeting for approval.

5. Omnibus approval

Criteria and the need for granting omnibus approval

- a) The Audit Committee may, in the interest of the Company to ensure smooth operations,, grant omnibus approval for Related Party Transactions proposed to be entered into by the Company which are repetitive in nature and which are routine and incidental to the general operations of the Company, subject to such conditions as it may deem fit. Such approval shall be valid for a period not exceeding one year and shall specify the following:

- i. The name(s) of the Related Party;

- ii. The nature of the transaction, period of transaction, maximum amount of transaction that can be entered into &
 - iii. The indicative base price/current contract price and the formula for variation in the price, if any.
- b) The Audit Committee may also grant omnibus approval, without the above details, for unforeseen transaction subject to a value not exceeding Rs. 50 Lacs per transaction.
- c) Such Omnibus approvals shall be valid for a maximum period of one year. The Audit Committee shall review the details of Related Party Transactions entered into by the Company pursuant to such Omnibus approvals, on a quarterly basis.

6. Related Party Transactions not approved under this Policy

In the event the Company becomes aware of a Related Party Transaction with a Related Party that has not been approved under this Policy prior to its consummation, the matter shall be reviewed by the Audit Committee. The Audit Committee shall consider all the relevant facts and circumstances regarding the Related Party Transaction, and shall evaluate all options available to the Company, including ratification, revision or termination of the Related Party Transaction. The Audit Committee shall also examine the facts and circumstances pertaining to the failure of reporting such Related Party Transaction to the Audit Committee under this Policy, and shall take any such action it deems appropriate.

In any case, where the Audit Committee determines not to ratify a Related Party Transaction that has been commenced without its approval, the Committee, as appropriate, may direct additional actions including, but not limited to, immediate discontinuation or rescission of the transaction. In connection with any review of a Related Party Transaction, the Audit Committee has authority to modify or waive any procedural requirements of this Policy.

SIR SHADI LAL ENTERPRISES LIMITED

BOARD DIVERSITY POLICY

Sir Shadi Lal Enterprises Limited recognizes and embraces the importance of a diverse Board in its success. Sir Shadi Lal believes in broad base and diversity at board level as an essential element in maintaining a competitive advantage. A truly diverse board will include and make good use of differences in the skills, regional and industry experience, cultural and geographical background race, gender, which will ensure Sir Shadi Lal Enterprises Limited competitive advantage. Sir Shadi Lal believe that diverse board will contribute to the achievement of its strategic and commercial objective, including to

- drive business results;
- make corporate governance more effective;
- enhance quality and responsible decision making capability;
- ensure sustainable development; and
- enhance the reputation of Sir Shadi Lal Enterprises Limited.

The Nomination and Remuneration Committee (**Committee**) is responsible for reviewing and assessing the composition and performance of the Board, as well as identifying appropriately qualified persons to occupy Board position and recommends the appointment of new Directors. The Committee also oversees the conduct of the annual review of Board effectiveness.

- In reviewing Board composition, the Committee will consider the benefits of all aspects of diversity including, but not limited to, those described above, in order to enable it to discharge its duties and responsibilities effectively.
- In identifying suitable candidates for appointment to the Board, the Committee will consider candidates on merit against objective criteria and with due regard for the benefits of diversity on the Board.
- As part of the annual performance evaluation of the effectiveness of the Board, Board Committees and individual Directors, the Committee will consider the balance of skills, experience, independence and knowledge of Sir Shadi Lal Enterprises Limited on the Board and the diversity representation of the Board, including gender, how the Board works together as a unit, and other factors relevant to its effectiveness.

Measurable Objectives

The Committee will discuss and agree annually all measurable objectives for achieving diversity on the Board and recommend them to the Board for adoption. At any given time the Board may seek to improve one or more aspects of its diversity and measure progress Accordingly, the Committee shall:

- assess the appropriate mix of diversity, skills, experience and expertise required on the Board and assess the extent to which the required skills are represented on the Board,

- make recommendations to the Board in relation to appointments, and maintain an appropriate mix of diversity, skills, experience and expertise on the Board, and
- periodically review and report to the Board requirements, if any, in relation to diversity on the Board.

The Board shall have an optimum combination of executive, non-executive and independent directors in accordance with requirements of the Articles of Association of Sir Shadi Lal Enterprises Limited, the Companies Act, 2013, Listing Agreement and the statutory, regulatory and contractual obligations of Sir Shadi Lal Enterprises Limited.

The effective implementation of this Policy requires that shareholders are able to judge for themselves whether the Board as constituted is adequately diverse. To this end, Sir Shadi Lal Enterprises Limited shall continue to provide sufficient information to shareholders about the size, qualifications and characteristics of each Board member.

RESPONSIBILITY AND REVIEW

The Committee will review this Policy periodically and recommend appropriate revisions to the Board.

Policy for preservation of Statutory and Books of account records,

Company has made a policy in 1985 for preservation of Statutory and Accounts records and passed a resolution no. 10 on 14.09.1985 as preservation of the old records. As per policy old records will be kept 17th years as required by the law and the old record more than 17th years old have to be destroyed after making a list of the same in the presence Officer. The record will be destroyed by burning in the boiler in the Company in the presence of Internal Audit Officer. The record of permanent nature and also of vital importance which is required for evidence in the legal cases pending in the various Courts, may however be kept safe as long as possible / the case are decided.

For future reference only the main General Ledger and duly signed Original Balance Sheet alongwith all the details bound in a book will be kept for more than 17th years upto date same is available.

Accordingly a committee was formed of following officers:-

1. Internal Audit Officer
2. Factory Manager
3. Finance Manager
4. Accountants
5. Record Keeper

The above committee from time to time meets and decides the records which are to be destroyed after taking the opinion from the respective HOD of Cane, Engineering, Store, Sales, Distillery and Factory Manager.

According to this policy the old records up to the year 1997-98 has been destroyed and the records for 18th years old records are kept in the record section.

SIR SHADI LAL ENTERPRISES LTD

POLICY AGAINST SEXUAL HARASSMENT AT WORKPLACE

OBJECTIVE/ PURPOSE:

It's is our desire to promote a healthy and congenial working environment irrespective of gender, caste, creed or social class of the employees. We value every individual and are committed to protect the dignity and respect of every individual. Therefore, we have zero-tolerance for sexual harassment and any act of sexual harassment will invite serious disciplinary action. This policy is meant to educate the employees about what conduct constitutes sexual harassment, the ways and means which we are adopting to prevent occurrence of any such event, and in the unlikely chance of such an occurrence, to enable a fair mechanism for dealing with such conduct.

WHO IS COVERED UNDER THE SEXUAL HARASSMENT POLICY AT SSLEL

SSLEL's "Rules for prevention and redressal of sexual harassment at workplace" is applicable to:

- (i) Every employee across the Company – permanent, temporary, on training and on contract;
- (ii) An alleged act of sexual harassment, whether the incident has occurred during or beyond office hours;
- (iii) An alleged act of sexual harassment, whether sexual harassment has taken place within or outside the company premises.

Any act of sexual behaviour is included if such an act is perceived to be detrimental to a healthy and congenial work environment. This policy is only applicable when both or either the alleged harasser & the victim are employees/agents of the company. It is not applicable when both the alleged harasser & the victim are third parties.

III. DEFINITIONS:

a. "Aggrieved Person" means a person in relation to work place whether employed or not, who alleges to have been subject to any act of sexual harassment by the Respondent.

b. "Company" means Sir Shadi Lal Enterprises Limited.

c. "employee" means a person employed at a workplace for any work on regular, temporary, ad hoc or daily wages 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 called by any other such name;

d. "Internal Complaints Committee" means a committee constituted by Company as per this Policy. e. "Respondent" means a person against whom the aggrieved person has made a complaint.

f. "Sexual Harassment" includes any one or more of the following unwelcome acts or behaviour (whether directly or by implication) such as:

i. Physical contact and advances; or

ii. A demand or request for sexual favours; or

iii. Making sexually coloured remarks; or

iv. Showing pornography or other offensive or derogatory pictures, cartoons, representations, graphics, pamphlets or sayings; or

v. Any other unwelcome physical, verbal or non - verbal conduct of sexual nature; or Following circumstances amongst other circumstances mentioned above may constitute sexual harassment if it occurs or is present in relation or connected with any act or behaviour of sexual harassment:

i. implied or explicit promise of preferential treatment in their employment

; ii. implied or explicit threat of detrimental treatment in their employment;

iii. implied or explicit threat about their present or future employment status;

iv. interfering with their work or creating an intimidating or offensive or hostile work environment; humiliation treatment likely to affect their health or safety.

v. humiliating treatment likely to affect the health and safety of the aggrieved person. In addition to the instances mentioned hereinabove, any other acts or behavior, which outrages the modesty of a female employee, will be considered as sexual harassment.

g. "workplace" includes any department, organization, undertaking, establishment, enterprise institution, office or branch unit. Any place visited by the employee arising out of or during the course of employment including transportation provided by the employer for undertaking such journey.

IV. INTERNAL COMPLAINTS COMMITTEE:

Every complaint received shall be forwarded to internal complaint committee formed under the policy for redressal. The investigation shall be carried out by Internal Complaints Committee constituted for this purpose. Internal Complaints Committee has been constituted of the following members as nominated by the Company:

a. A woman employee employed at a senior level amongst the employees shall act as Presiding officer of the committee.

b. 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.

c. 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.

The Name of the Members of the Internal Complaints Committee is as per Annexure A of this Policy and any change in such composition shall be effected in the policy

At least half the total members of the Committee have to 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.

COMPLAINT REDRESSAL MECHANISM

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 extension in the opinion of the Internal Complaints Committee.

1. The Presiding Officer or any Member of the Internal Complaints Committee can render reasonable assistance to the person for making complaint in writing, in case they are unable to do so.
2. On receipt of 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 principle of Natural Justice while handling such complaints.
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
 - c) 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.
4. Internal Complaints Committee on receipt of such written complaint, may, if require ask the aggrieved person to furnish additional information about the alleged harassment.
5. The Complainant or person authorized on their behalf as per above provision, shall make a complaint to the Internal Complaints Committee through following mode:
 - a. Copy of complaint along with supporting documents and names and address of witness shall be sent to Internal Complaints Committee at ethics@tataaia.com
 - b. On receipt of such complaint, Internal Complaints Committee shall provide a copy along with supporting documents of such complaints to the Respondent within 7 working days
 - c. Respondent shall file reply within 10 working days of receipt of the complaint along with list of documents, names and addresses of witnesses
 - d. Internal Complaint Committee shall investigate in detail into the matter of the complaint. The Internal Complaint committee shall have the right to call the person against whom the complaint is made or any other witnesses as when necessary.

e. 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.

f. The Internal Committee must complete its investigation within a period 90 days.

g. 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.

h. For conducting the enquiry the quorum of the Internal Complaints Committee shall be of 3 members including the presiding officer.

6. The Internal Committee may before initiating an inquiry, and at the aggrieved person's request, attempt to settle the matter through conciliation. However, Internal Complaints Committee shall ensure that:

a. Monetary settlement will not be made as a basis of conciliation.

b. Where a settlement has been arrived, the settlement terms shall be signed by both the parties and shall be provided with a copy of it.

Where, a settlement is arrived as mentioned hereinabove, no further enquiry shall be conducted by the Internal Complaints Committee.

7. The Internal Complaints Committee may during such investigation may exercise the power of a civil court, vested in it, in respect of:

a. summoning and enforcing the attendance of any person and examining him under oath;

b. requiring discovery and production of documents;

c. any other prescribed matter.

8. During such enquiry, upon written request by the aggrieved person, the committee may at its discretion recommend:

a. to transfer the aggrieved person or the respondent to any other workplace;

b. grant leave to the aggrieved person of up to three months which is in addition to leave to which she is otherwise entitled. Provided, the aggrieved person has to tender justified reason for such transfer or leave, such as threat to work in the workplace.

ACTION:

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.

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.

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 a 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.
4. Such action will be taken within 60 days of the receipt of report,

AWARENESS:

1. All the Employees, Agents, Customers, Vendors, Partners and Visitors shall have access to this Policy at any given point of time and clarification related to this Policy shall be addressed by the HR team.
2. A brief shall be given to all existing employees regarding the features of this Policy immediately on formulation of the Policy and to new employees in Tata AIA Life during their initial Induction.
3. The Company 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.
4. Company shall display the notice showing the name of the Internal Complaints Committee members at its every establishment at a conspicuous place.

Possible Disciplinary Actions arising out of the Recommendations

1. A letter of warning that will be placed in the personal file of the harasser.
2. Immediate transfer or suspension without pay or both.
3. Fine equivalent to 3-6 month's salary that can be credited to a fund created to be utilized for the welfare of the employees.
4. Stoppage of increment with or without cumulative effect.
5. Reduction in rank.
6. Termination/dismissal from the services of the Company.
7. Any other action that the Disciplinary Authority may deem fit.
8. Filing a Complaint before the relevant police station/ Court.

Power to make rules and Amendments

Company 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.

OTHERS

1. 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.
2. The Internal Complaint Committee shall prepare an annual report with the following details and shall submit the same to the Company to include in its Annual report:
 - a. Number of complaints of sexual harassment received during the year;
 - b. Number of complaints disposed off during the year;
 - c. Number of cases pending for more than 90 days;
 - d. Number of workshops or awareness program against sexual harassment carried out; e. Nature of action taken by the employer.

ANNEXURE : A

Composition of Internal Complaints Committee

Name	Designation	Membership
Ms. Radhika Viswanathan Hoon	Director	Presiding Officer
Shri R B Khokhar	Chief Operating Officer	Member
Shri Ajay Kumar Jain	Comapny Secratery	Member
Shri S K Singh Raghuwanshi	GM (Hr)	Member
Ms. Vandana Gupta	Independent	Member
Ms. Pratibha	Officer	Member
Ms. Kamla Dhoundiyal	Officer	Member