

For

Evergreen Recyclekaro India Ltd and all other owned subsidiaries *incl.* Evergreen Lithium Recycling
Private Limited

POSH POLICY

Prevention Of Sexual Harassment at the workplace

Version Release Nature/Description of change Prepared/changed by Approved by

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Purpose, Objective and Scope

Evergreen Recyclekaro India Limited (“Recyclekaro”) is committed to fostering a healthy, respectful, and professional work environment free from hostility, discrimination, or bias of any kind. We believe that all women employees, contractual staff, and others interacting with Recyclekaro are entitled to an environment where respect and dignity are paramount.

We fully support and adhere to the Government of India’s Sexual Harassment of Women at Workplace (Prevention, Prohibition, and Redressal) Act and Rules, 2013, along with all amendments (the “Act”), to ensure comprehensive protection for women and promote a safe, inclusive workplace.

Our commitment to equal opportunity extends to all individuals, regardless of race, caste, religion, color, ancestry, marital status, gender, sexual orientation, age, nationality, ethnic origin, or disability. We strive to create a work environment where everyone can perform their duties free from prejudice, gender bias, and harassment, and where integrity, privacy, equality, and opportunity are respected. We recognize that equality in the workplace is compromised when individuals face discrimination or harassment, particularly sexual harassment, which infringes on the fundamental rights to gender equality and personal liberty as protected by Articles 14, 15, and 21 of the Indian Constitution, and impacts the right to work under Article 19(1)(g).

In alignment with these principles, Recyclekaro has established this Policy Against Sexual Harassment at the Workplace (“Policy”) as required by law and as an organizational best practice. This Policy covers women employees and contractual staff namely:

- Binary & Cisgender (Female)
- Transgender, including genderqueer, genderfluid, two-spirited, or non-binary identities (LGBTQIA++)
- Socio-Cultural Genders specific to India, such as Hijras, Jogappas, and Aravani/Thirunangai.

This Policy applies to all queries and/or complaints of sexual harassment made by anyone against a Recyclekaro employee. It extends to employees and contractual staff working onsite, remotely or at any other required locations.

Our success is built on our people, and we hold ourselves to the highest standards of respect, dignity, and accountability. We recruit skilled, motivated individuals who align with our values, provide equal development opportunities, protect individual privacy, and maintain zero tolerance for harassment or discrimination. We will enforce strict disciplinary actions under this Policy against any individual found guilty of sexual harassment, irrespective of gender.

Applicability and Coverage

1. The Policy applies to all employees/contractual workers of the company, who are engaged for the performance of any work on a regular, temporary, ad-hoc, or daily wage basis, either directly or through an agent, including a contractor, with or, without the knowledge of the company, whether for remuneration or not, whether the terms of employment are express or implied, co- worker, a contract worker, probationer, trainee, apprentice, third-party or other person called by any other such name (the “**Employee/Worker**”).
2. The Policy covers acts of Sexual Harassment (defined hereinafter) against any woman, of any age whether employed or not, who alleges to have been subjected to any act of Sexual Harassment by the respondent (“**Aggrieved Person**”) and the term (“**Respondent**”) shall refer to the person (i.e. the Employee of the Organization as defined above) against whom the complaint of sexual harassment has been filed. The Policy applies to acts of sexual harassment that have occurred or have been alleged to have occurred on the premises of the company including any branch offices/administrative units/factory sites or at any other place(s) visited by an employee/worker during employment, including any transportation provided by company for undertaking such journey. It does not only include physical workspaces but also spaces from where work is carried out remotely or virtually (the “**Workplace**”). For example:
 - a. All organization related activities performed at any physical or virtual site used permanently or temporarily.
 - b. Any social, business, or other functions taking place physically or virtually where the conduct or comments may have an adverse impact on the workplace or workplace relations
 - c. Any alleged act of sexual harassment committed during or outside of office hours using any mode of communication including video calls/audio calls, phone calls, text, e-mails, on any social media platform or through any other electronic communication, etc.
 - d. Any sexual harassment on any social networking website during or outside of office hours
 - e. Any place visited by the employee or arising out of or during employment/contract with the organization, including transport services for undertaking business activities, audio/video conferencing applications, or any other communication-related tools/applications. For example, even employees who are on overseas programs and training, in course of their employment with the organization
3. “**Visitor**” or “**Third Party**” includes any person who is visiting the workplace and is not covered by any of the other categories defined by this Policy. For example, guests coming

for physical/online interviews, meetings, events, programs, or people walking in for meeting existing Employees, etc.

Prevention of Sexual Harassment at the workplace

1. The following conduct (as per paragraph 2) constitutes Sexual Harassment as contemplated by the Policy and the allegations of which, if proved, would amount to misconduct under the internal service regulations and policies of the company, thereby attracting disciplinary action, including but not limited to termination of employment and monetary fines, as further set out in this Policy.
2. Under this Policy, any unwelcome:
 - a. Physical contact and advances including touching, deliberately brushing against another person, interference with an individual's normal work movement or assault; or
 - b. Demand or request for sexual favors, offensive or unwelcome flirtations, unwanted sexual advances or propositions, threats or suggestive or insulting sounds; or
 - c. Making sexually colored remarks containing sexual tones/undertones including repeated sexual innuendoes, sexual epithets, derogatory slurs, sexually explicit jokes; or
 - d. Showing pornography such as derogatory or sexually explicit posters, cartoons, photographs, magazines, drawings, or other printed items; suggestive objects, pictures; emails, screen savers; or other electronic communications; graphic commentaries and leering or obscene gestures; or
 - e. Having posters, photographs, paintings, etc. in the background with any sexual context while being on video calls; or
 - f. Any inappropriate behaviors listed above may be committed either verbally or in written form via letters, video calls/audio calls, phone calls, texts, e-mails, on any social media platform or through any other electronic communication; or
 - g. any other unwelcome physical, verbal, or non-verbal conduct of a sexual nature constitutes sexual harassment (collectively defined as "Sexual Harassment")
3. In addition to the above, determining what constitutes Sexual Harassment depends upon the facts and the context in which the conduct occurs. Sexual Harassment may take many forms - subtle and indirect, or blatant and overt. For example, if Sexual Harassment is accompanied by any of the following circumstances, then these circumstances shall also amount to Sexual Harassment:
 - a. An implied or explicit promise of preferential treatment in employment; or
 - b. An implied or explicit threat of detrimental treatment in employment; or
 - c. An implied or explicit threat relating to present or future employment status; or
 - d. Interference with work or creating an intimidating, offensive, or hostile work environment; or
 - e. Any humiliating treatment likely to affect health or safety

4. Interpretation: Any matter not specifically covered under these guidelines shall be referred to Human Resources for necessary advice. The interpretation of this Policy rests exclusively with the organization. The decision of the Company shall be final and binding.

INTERNAL COMMITTEE (IC)

Recyclekaro/The Company has constituted an Internal Committee to accept and dispose of complaints of Sexual Harassment for the purpose of this Policy (the “Internal Committee/IC”). The Internal committee consists, as of now, of 4 (four) members; however, in no circumstance shall the members of the Internal Committee fall below 4 (four). At least half the members of the Internal Committee shall always be women. The Internal Committee shall comprise of the following members:

- a. A presiding officer who shall be a senior woman Employee of Recyclekaro
 - b. At least 2 (two) Employees preferably committed to the cause of women or who have had experience in social work or have legal knowledge; and
 - c. 1 (one) member from amongst non-governmental organizations or associations committed to the cause of women or a person familiar with the issues relating to Sexual Harassment (collectively the “Members”)
2. Details of the current members of our Internal Committee are contained below:

Name	Role in the Internal Committee	Contact
Ms. Sonalee Ambardar	Presiding Officer	sonalee@recyclekaro.com
Ms. Swati Nalawade	Member	swati@recyclekaro.com
Mr. Anant Kharate	Member	gm@recyclekaro.com
MS Lakshmi Rai	External Member	info@thewishhouse.in

3. Each member of the Internal Committee shall hold office for a term of 3 (three) years (the “Term”) from the date of appointment of such member.
4. The Company may remove a member of the Internal Committee, and such member shall thereby cease to hold office as a member of the internal committee, if such member is found to have been involved in any action or situation that is immoral and unbecoming of an Employee of Recyclekaro. The following is an indicative and non-exhaustive list of the situations in which a member may be removed from office by Recyclekaro:
 - a. If a member leaks or publishes any information regarding any complaints of Sexual Harassment whether disposed of or pending including the names of the alleged victim, accused, witnesses, etc.
 - b. If a member is convicted of an offense or is the subject of an inquiry into any offense under any law
 - c. If a member is found guilty in any disciplinary proceedings or if disciplinary proceedings are pending against such member; or

- d. If a member has abused his position as a member of the Internal Committee, thereby rendering his/her continuance in office against the interests of Recyclekaro and its Employees/Workers
- e. Notwithstanding the aforesaid, Company shall be entitled, at its sole discretion and at any time, to remove a non-presiding member of the Internal Committee and appoint a substitute thereof if the said member is not involved in an ongoing inquiry. In case of any vacancy in the membership of the Internal Committee for any of the reasons as mentioned above, company shall forthwith nominate a person to fill the vacancy.

RESPONSIBILITIES OF THE INTERNAL COMMITTEE

1. Follow the principles of natural justice and treat the Complainant, Respondent, Witnesses, and related people to the inquiry with dignity and respect and give both the Complainant and the Respondent a fair opportunity to make their submissions. All members of the IC shall be acting without any prejudice or bias while conducting inquiries or dealing with complaints of sexual harassment in any other manner.
2. Members of the Internal Committee shall compulsorily undergo the training program formulated against Sexual Harassment at Workplace. The training program and workshops conducted shall include, but not be limited to understanding the paradigms of the act and scope of the definition of sexual harassment, Gender sensitization, examples and case studies, procedural intricacies, orientation programs and seminars, capacity building, and skills building, declare names and contact details of all members of Internal Committee and the complaint mechanism.
3. The Internal Committee shall submit an annual report to the management of company ("**Management**") containing details of the number of complaints of Sexual Harassment, the number of complaints disposed of during the year, the number of complaints pending for more than **90 (ninety)** days, the number of workshops or awareness programs against sexual harassment carried out and details of the action taken by the management after receiving the recommendations of the Internal Committee.
4. Ensure quorum of a minimum **3 (three)** members are met during all Inquiry meetings, with mandatory presence of the Presiding officer at all inquiry meetings.
5. All complaints of Sexual Harassment will be treated seriously, and the IC should ensure the following:
 - a. An appropriate investigation of the complaint is conducted
 - b. No reprisal or retaliatory action is taken or tolerated against the complainant
 - c. Sensitive nature of the complaint and the respective position in the Company of the parties are kept in mind during the investigation

- d. Make efforts to ensure that the Complainants and the witnesses are not further victimized or discriminated against, while the complaint is pending
- e. Seeking consent from involved parties and witnesses for audio/video recording of the inquiry proceedings.
- f. Document in detail all the inquiry proceedings and the inquiry report.
- g. Refrain from talking about potential, pending, or completed cases of Sexual Harassment to any member directly or indirectly connected to any form of media, including print, television, online media, etc.
- h. Recommend action against anyone who threatens or intimidates the complainant or members of the IC
- i. In the event, the complaint does not fall under the purview of Sexual Harassment, or the complaint does not mean an offense of sexual harassment, forward the same to the concerned person/committee

RESPONSIBILITIES AND DUTIES OF THE EMPLOYER

- 1. The responsibilities and duties of the Employer are as under:
 - a. Provide a safe working environment
 - b. Formulate, widely disseminate and DISPLAY its internal policy declaring prohibition, prevention, consequences and redressal of sexual harassment at the workplace
 - c. Declare the names and contacts details of all members of the IC.
 - d. Organize workshops and awareness programs at regular intervals for sensitizing employees on the issues and implications of workplace sexual harassment and organizing orientation programs for members of the Internal Complaint Committee.
 - e. Provide IC with necessary facilities for addressing complaints and conducting an inquiry.
 - f. It will ensure that necessary facilities and information are provided to the IC including technical support for dealing with the complaint and conducting an inquiry.
 - g. Assist in securing the attendance of Respondent and Witnesses before the IC and make available such information to the IC, as it may require with regards to the complaint.
 - h. Aid the IC in any manner feasible to conduct a fair and expeditious inquiry and implement recommendations made by IC.
 - i. Aid the Complainant if the Complainant chooses to file a complaint in relation to the offense under the Indian Penal Code. Cause to initiate action, under the Indian Penal Code, against Respondent or if the Complainant so desires, where the Respondent is not an Employee, in the workplace at which the incident of sexual harassment took place.
 - j. Cause to initiate action, under the Indian Penal Code, against the Respondent, or if the Complainant so desires, where the Respondent is not an employee, in the workplace at which the incident of sexual harassment took place.

- k. Offer counselling sessions to anyone impacted by the incident of sexual harassment.
- l. Do all other things it may deem fit for successful implementation of this Policy.

REPORTING A COMPLAINT

1. Any aggrieved person (Complainant) who believes that an act of Sexual Harassment has been committed against them, in violation of this Policy, may make a complaint in writing or by email id along with supporting documents, list of names and addresses of witnesses, etc. to the Internal Committee or any Member of the Internal Committee thereof at the earliest and in any case within **3 (three)** months from the date of the incident of alleged Sexual Harassment and in case of a series of such incidents, within a period of **3 (three)** months from the date of the last incident (the “**Complaint**”). However, the Internal Committee may extend the time limit for making a Complaint by recording reasons in writing if it is satisfied that legitimate circumstances existed that prevented the aggrieved person (Complainant) from making a Complaint within the prescribed period.
2. If the Aggrieved Person is unable to make a complaint on account of their physical incapacity, a complaint may be filed, with the written consent of the Aggrieved Person by:
 - a. Their relative or friend; or
 - b. Their co-worker; or
 - c. An officer of the National Commission for Women or State Women’s Commission; or
 - d. Any person who knows about the incident
3. If the Aggrieved Person is unable to make a complaint on account of mental incapacity, a complaint may be filed by:
 - a. Their 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 the Aggrieved Person’s relative or friend or a special educator or qualified psychiatrist or psychologist, or guardian or authority under whose care they are receiving treatment or care
4. If 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. If the Aggrieved Person is deceased, a complaint may be filed by any person who has knowledge of the incident, with the written consent of their legal heir.
5. Any of the persons referred to above, who may file a complaint on behalf of the Aggrieved Person shall be referred to as the (“**Complainant**”). Any reference to the term ‘Complainant’ throughout this Policy shall mean reference to ‘Aggrieved Person’ and / or the ‘Complainant’ as applicable.
6. The complainant may submit the complaint on the following email ID, dedicated specifically for POSH (posh@recyclekaro.com) or to any of the Members of the Internal Committee for such offices/administrative units/factories/warehouses. Notwithstanding anything set out in

any internal policy of Company or in applicable law, Company warrants that the contents of the Complaint shall be always kept confidential under all circumstances.

7. If any Complainant is unable to make a Complaint in writing for any reason whatsoever, the Internal Committee or any Member thereof shall provide all necessary assistance to such Complainant to record their Complaint.

Reporting



COMPLAINT AGAINST A NON-EMPLOYEE

If any Employee/Third Party is sexually harassed by any external party who is not an Employee/Worker of the Organization, either in Organization premises or in that external party's premises, then IC shall contact either the IC of that external party and / or the Police (as the case may be), on the written complaint of such Employee/Third Party to the Organization's IC and on their request that such complaint be transferred to other IC and address the matter to satisfactory closure. Alternatively, Employee/Third Party may choose to reach out directly to IC of that external party and / or Police (as the case may be) and Organization will help with written request by Employee/Third Party.

PROCESSING OF COMPLAINT (Internal)

1. Upon receipt of a Complaint, the Complaint shall be forwarded to all the other members of the Internal Committee. The Complaint shall be kept in the strictest of confidence and the presiding officer shall then proceed to call a meeting of the Internal Committee which shall then proceed with the following procedure.
2. The Internal Committee, on receipt of **6 (six)** copies of the Complaint along with supporting documents and the names and addresses of the witnesses from the Complainant, such Complaint shall be made available to the accused (Respondent) within **7 (seven)** working days of its receipt of the same, enabling either party to effectively present their case before the Internal Committee thereof.
3. The **Respondent** on receipt of the Complaint in accordance with paragraph .2 above, shall submit his reply to the same in writing or by email along with supporting documents, list of names and addresses of witnesses, etc. to the Internal Committee or any Member thereof within **10 (ten)** working days.

CONCILIATION

1. Before initiating an inquiry into a complaint of Sexual Harassment in accordance with the procedure set out below, the Internal Committee may, only at the written request of the Complainant, take steps to settle the matter between them and the accused through conciliation. However, a monetary settlement should not be made the basis of such conciliation and such a settlement if any shall be invalid, thereby necessitating the conduct of an inquiry into the original complaint.
2. It is not mandatory for Complainant to request for Conciliation. In cases where a settlement has been arrived at between the Complainant and the accused pursuant to conciliation, the Internal Committee is required to record the settlement arrived at and forward the same to the Management to take the necessary action(s) as specified in the settlement. Copies of the said settlement shall be provided to the Complainant and accused.
3. In cases where settlements have been successfully concluded in the manner, no further inquiry shall be conducted by the Internal Committee. However, if the Complainant informs the Internal Committee that any term or condition of the settlement has not been complied with by the accused, the Internal Committee shall commence an inquiry into the original complaint.

INQUIRY INTO COMPLAINT

1. The Internal Committee in the presence of at least **3 (three)** members including the presiding officer shall commence and conduct an inquiry into the Complaint and shall complete the same within a period of **90 (ninety)** days from its receipt of the Complaint or from the date on which it was brought to the notice of the Internal Committee that a term of the settlement arrived at pursuant to conciliation has not been complied with.
2. For conducting and completing an inquiry, the presiding officer of the Internal Committee may convene such number of hearings as may be deemed necessary to dispose of the Complaint and such hearings shall be convened at such times and places as may be convenient to all persons required to be present at the same. Notice of such hearings shall be given to all persons required to be present at the same at least **3 (three)** days before such hearing is scheduled to take place.
3. During an inquiry, the Internal Committee thereof shall give both the Complainant and the accused an opportunity to be heard and shall follow the principles of natural justice.
4. The Internal Committee shall have the right to terminate inquiry proceedings or give an ex-parte decision/recommendation on the Complaint if the Complainant or accused fail, without sufficient cause to present themselves for **3 (three)** consecutive hearings convened by the presiding officer of the Internal Committee. However, such termination or ex-parte decision/recommendation shall not be made without giving a notice in writing, **15 (fifteen)** days in advance to the Complainant or accused.
5. Neither the Complainant nor the accused shall be represented by any legal practitioner at any stage in the inquiry before the Internal Committee thereof.
6. For completing an inquiry into an alleged act of Sexual Harassment, the Internal Committee thereof may:
 - a. summon and require the presence of any person for the purpose of recording their statement; and
 - b. require the production of any documents and other material that may contain relevant information.

INTERIM MEASURES

1. During the pendency of an inquiry and on a written request being made by the Complainant, the Internal Committee or sub-committee thereof may recommend to the Management, certain interim measures that could be taken for the welfare of the Complainant till the matter is resolved.
2. The interim relief that may be granted to the Complainant includes:
 - a. Transfer of the accused or upon such request by them, transfer of the Complainant to any other Workplace

- b. Grant of leave to the Complainant up to a period of **3 (three)** months (such leave is in addition to the leave that the Complainant is entitled to under other applicable laws); and
- c. Restraining the accused from reporting on the work performance of the Complainant or writing them confidential report and assign the same to another Employee of Recyclekaro.
- d. In case the complaint has been filed by an intern or an apprentice working under the Respondent, restrain the Respondent from supervising any official / academic activity of the Complainant and assign the same to another Employee
- e. Direct the Respondent to not communicate with the Complainant in any manner including any mode of electronic communication such as text messages, emails, video/audio calls, on any social media platform or via any other mode of electronic communication.
- f. In case complaint is filed by a Complainant on behalf of the aggrieved Person, the same benefits as above would apply, depending on facts and circumstances.

The Organization reserves the right to require any of the parties to take any leaves during pendency of inquiry any time after receipt of a complaint of sexual harassment until the IC has concluded its inquiry, if required, based on recommendation of IC. Any such decision will be communicated in writing to the party by the Organization. This is to ensure that there is no retaliation against any party. The Organization reserves the right to require parties to work from home or from an alternate Organization location during the pendency of inquiry.

- 3. The Management is required to implement the recommendations of the Internal Committee thereof about the interim relief to be granted to the Complainant and submit a report of such implementation to the Internal Committee.

ACTIONS AGAINST A VISITOR / THIRD PARTY

If the Respondent is a Visitor / Third Party, adequate steps to ensure that they do not enter Organization premises or contact/threaten Complainant/Witnesses directly or indirectly using any mode of communication is required. IC to suggest appropriate disciplinary action by the concerned authority including reaching out to the Police if required with consent of Complainant.

FINDINGS OF INQUIRY

- 1. On the completion of an inquiry, the Internal Committee thereof shall provide a report of its findings to the Management within a period of **10 (ten)** days from the date of completion of the inquiry and such report should also be made available to the Complainant and Accused. The inquiry report shall specify details of the allegations against the Respondent, the statements made, and evidence presented by the Complainant, Respondent and / or witnesses, IC's findings along with a statement, giving reasons for the findings arrived at by the IC and IC's recommendations.

2. In cases where the Internal Committee thereof arrives at the conclusion that the allegation against the accused has been proved, it should make a recommendation to the Management:
 - a. To act for Sexual Harassment in the manner set out in this Policy; and
 - b. To deduct from the salary or wages of the accused, such sum as it considers appropriate to be paid to the Complainant or their legal heirs in accordance with the rules prescribed by Recyclekaro in this regard or to direct the accused to make such payment if no longer in employment with Recyclekaro
4. The Management shall act upon the recommendation within **60 (sixty)** days of its receipt from the Internal Committee.
5. In cases where the Internal Committee arrives at the conclusion that the allegation against the accused has not been proved, it shall make a recommendation to the Management that no action is required to be taken in the matter.

MALICIOUS COMPLAINTS OR FALSE EVIDENCE

1. Recyclekaro views Complaints of Sexual Harassment as gross misconduct and a serious violation of this Policy entailing strict punishment.
2. If the Internal Committee arrives at a conclusion that the allegation against the accused is malicious or that the woman Complainant has made the Complaint knowing it to be false or that she has produced any forged or misleading document, it shall make a recommendation to the Management to act against the Complainant in the manner set out in this Policy. Prior to making such a recommendation, the malicious intent on part of the Complainant shall be established through an inquiry. However, the mere inability to substantiate a complaint or provide adequate proof will not attract action against the Complainant.
3. The Internal Committee may make a recommendation to the Management to act in accordance with this Policy against any witness in an inquiry if it arrives at a conclusion that during the inquiry, said witness has given false evidence or produced any forged or misleading document.

PUNISHMENT FOR SEXUAL HARASSMENT AND MALICIOUS COMPLAINTS

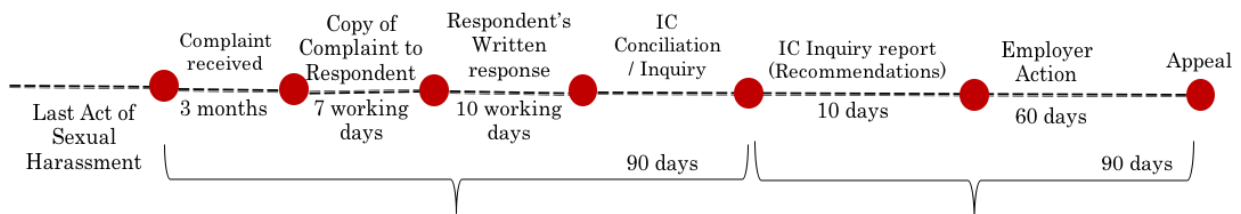
1. If the Internal Committee arrives at the conclusion that the allegation against the accused has been proved, any or all the following actions may be taken by the Management against the accused:
 - a. To take any action including:
 - A written apology from the Respondent
 - A letter of warning may be given to the Respondent and placed in the personnel file

- Reprimand or censure the Respondent
 - Withholding the promotion or reduction in rank
 - Withholding of pay rise or increments
 - Immediate transfer or suspension without pay
 - Termination from service / dismissal from the services of Organization
 - Undergoing a counselling session
 - Carrying out community service
 - Deduction from salary or wages of the Respondent such sum as it may consider appropriate to be paid to the Complainant or to their legal heirs. In case, Organization is unable to make deductions from salary of the Respondent due to them being absent from duty or cessation of employment, it may direct the Respondent to pay such sum to the Complainant. In case the Respondent fails to pay the sum, the IC may forward the order for recovery of the sum as an arrear of land revenue to the concerned district officer
- b. IC may consider various factors as required under Law for the purpose of determining the sums to be paid to the Complainant and may take the following into consideration:
- The mental trauma, pain, suffering, and emotional distress caused to the Complainant
 - The loss in the career opportunity due to the incident of sexual harassment
 - Medical expenses incurred by the victim for physical or psychiatric treatment
 - The income and financial status of the Respondent
 - Feasibility of such payment in lump sum or in instalments
2. Where the Respondent is a Third Party, IC may recommend any one or more of the following:
- a. Warning to employing Organization/association/firm (if any)
 - b. Declaring the Workplace/Organization out of bounds to the Respondent
 - c. Withdrawal of the right to provide services to Organization for a certain period (if applicable)
 - d. Helping the Complainant in filing an FIR, should they desire
 - e. Debarring/blacklisting such person from Organization
 - f. Other similar or appropriate punishment
3. If a complainant is found guilty of making a malicious complaint or providing forged or misleading documents and a witness in an inquiry is found guilty of providing false evidence or forged or misleading documents, then action shall be taken against such Complainant or witness by the Management in accordance with paragraph 16.1 above.
4. A mere inability to substantiate a complaint or provide adequate proof need not attract action against the Complainant as the malicious intent on the part of the Complainant will have to be established through the inquiry process before an action against such Complainant is recommended.

PROCEDURE FOR FILING AN APPEAL

In case the inquiry process is conducted by the IC and the Complainant is a woman, any party aggrieved (Complainant or Respondent) by the recommendations of the IC and / or non-implementation of recommendations may file an appeal to the Appellate Authority as per other provisions of Law within **90 (ninety)** days of the recommendations.

In case the inquiry process is conducted by the IC and the Complainant is not a woman, any party aggrieved (Complainant or Respondent) by the recommendations of the IC and / or non-implementation of recommendations can get in touch with **Head HR**, who will review the appeal.



PROHIBITION OF PUBLICATION

1. Complaints of Sexual Harassment are extremely sensitive issues that affect the reputation of Recyclekaro, the Complainant and the accused. Such Complaints adversely affect the working environment and hence need to be dealt with in a manner that is the least intrusive to all concerned. To effectively deal with such Complaints, Recyclekaro requires all its Employees to maintain strict confidentiality of all Complaints of Sexual Harassment and all other information or circumstances relevant thereto.
2. The contents of a complaint; the identity and addresses of the Complainant, Accused and Witnesses; any information relating to conciliation and inquiry proceedings; recommendations of the Internal Committee; and the action taken by the Management under this Policy should not be published, communicated, or made known to the public, press and media in any manner by any Employee of Recyclekaro including the Complainant, accused or witnesses in the inquiry.
3. However, Recyclekaro reserves the sole right to publish information regarding the justice secured to any victim of Sexual Harassment without disclosing the name, address, or any other particulars that could identify the Complainant, accused or witnesses in the inquiry.
4. Appropriate information will be shared with Government authorities as per the Act. If any person breaches confidentiality, they shall be liable for penalty as per Law. Organization shall recover a sum of Rupees Five thousand (5,000) as penalty from such person and may take any other action as it may deem fit.

OTHER REMEDIES

1. This Policy does not restrict the right of any Complainant, Accused or Witness from appealing against the decision/recommendation of the Internal Committee in accordance with the provisions of the Act. In addition, a complainant may pursue any other remedy available under applicable law and Recyclekaro shall provide all necessary assistance to such Complainant to secure justice.
2. In case of a complaint of sexual harassment or any other offense against a child, as per the Protection of Children from Sexual Offences Act, 2012 (“POCSO”), or in case of offense by a child, the provisions under POCSO and Juvenile Justice (Care and Protection of Children) Act, 2015 may become applicable and would have to be dealt with in accordance with these laws. A child is any person below the age of eighteen years.

POLICY OWNER

1. Recyclekaro reserves the right to amend the provisions of this Policy, from time to time, as it deems fit. If you have any questions regarding this Policy, please contact any Member of the Internal Committee. The management has the right to review, alter, add, vary, and substitute the policy from time to time. Any changes in the policy shall be suitably communicated to all the employees. This Policy supersedes all other previous policies governing the subject matter of this policy.
2. Regardless of the outcome of the complaint made in good faith, the complainant and any person providing information or any witness, will be protected from any form of retaliation. While dealing with complaints of sexual harassment, the IC shall ensure that the complainant or the witness are not victimized or discriminated against by the respondent. Any unwarranted pressures, retaliatory or any other type of unethical behavior from the respondent against the complainant or witness while the investigation is in progress should be reported by the complainant to the IC as soon as possible. Disciplinary action, if required will be taken in relation to any such complaints.

End of document

1. उद्देश व ध्येय

Evergreen Recyclekaro India Limited (“Recyclekaro”) मध्ये आम्ही सर्वांना सुरक्षित, सन्माननीय आणि भेदभावमुक्त कामाचे वातावरण देण्यास वचनबद्ध आहोत.

आमचा विश्वास आहे की प्रत्येक महिला कर्मचारी, कंत्राटी कर्मचारी, तसेच कंपनीशी निगडित इतर व्यक्तींना सन्मान व आदराने वागवले जाणे हा त्यांचा मूलभूत अधिकार आहे.

भारत सरकारच्या लैंगिक छळ प्रतिबंध, मनाई व निवारण कायदा 2013 (“कायदा”) नुसार आम्ही हे धोरण तयार केले आहे. यामध्ये महिलांना सुरक्षित कामाचे वातावरण मिळावे, त्यांना समान संधी मिळावी आणि छळमुक्त वातावरणात काम करता यावे हे आमचे ध्येय आहे.

Recyclekaro मध्ये शून्य सहिष्णुता धोरण (Zero Tolerance Policy) आहे – लैंगिक छळ किंवा भेदभाव करणाऱ्या कोणत्याही व्यक्तीवर कठोर कारवाई केली जाईल.

2. व्याप्ती (Scope)

हे धोरण खालील सर्वांवर लागू आहे:

- कायमस्वरूपी कर्मचारी
- कंत्राटी कामगार
- प्रशिक्षार्थी, अप्रेंटिस, इंटर्न्स
- दैनंदिन वेतनावर काम करणारे
- तात्पुरते/ठेकेवरचे कामगार
- संस्थेत येणारे पाहुणे, ग्राहक, पुरवठादार किंवा मुलाखतीसाठी येणारे उमेदवार

हे धोरण ऑफिस, फॅक्टरी, गोदाम, प्रशिक्षण कार्यक्रम, प्रवास, ऑनलाईन मिटिंग्स किंवा व्हिडीओ कॉल्स या सर्व ठिकाणी लागू आहे.

3. लैंगिक छळ म्हणजे काय? (What counts as Sexual Harassment)

कंपनीमध्ये खालील वर्तनास "लैंगिक छळ" मानले जाईल:

- अनावश्यक शारीरिक स्पर्श, ढकलणे किंवा जवळीक साधण्याचा प्रयत्न
- लैंगिक उपकारांची मागणी करणे
- अश्लील/अयोग्य विनोद, टिप्पणी, टोमणे किंवा आवाज काढणे
- अश्लील चित्र, पोस्टर, ई-मेल, मेसेज, स्क्रीनसेव्हर दाखवणे
- व्हिडीओ कॉलच्या पार्श्वभूमीत अश्लील पोस्टर/चित्र असणे
- सोशल मीडिया, ई-मेल, मेसेज किंवा कॉलद्वारे अश्लील बोलणे

तसेच, जर कोणी खालील परिस्थिती निर्माण करत असेल तर तेही लैंगिक छळ मानले जाईल:

- नोकरीत विशेष सुविधा देण्याचे आश्वासन देणे
- कामात त्रास देण्याची धमकी देणे
- शत्रुत्वपूर्ण कामाचे वातावरण निर्माण करणे
- अपमानास्पद वागणूक देणे ज्याचा परिणाम आरोग्य किंवा सुरक्षिततेवर होतो

4. अंतर्गत तक्रार समिती (Internal Committee – IC)

कंपनीने तक्रारीचे निवारण करण्यासाठी अंतर्गत समिती (IC) स्थापन केली आहे. या समितीत किमान 4 सदस्य असतील आणि त्यातील निम्म्या महिला असतील.

सध्याचे सदस्य:

Name	Role in the Internal Committee	Contact
सोनाली अंबार्डार	प्रमुख अधिकारी	sonalee@recyclekaro.com
स्वाती नलावडे	सदस्य	swati@recyclekaro.com
अनंत खराटे	सदस्य	gm@recyclekaro.com
लक्ष्मी राय	बाह्य सदस्य	info@thewishhouse.in

या समितीचे काम:

- तक्रारीची चौकशी करणे
- दोन्ही बाजूंना समान संधी देणे
- गोपनीयता राखणे
- शिफारस केलेली कारवाई व्यवस्थापनाला कळवणे

5. तक्रार कशी करावी? (Reporting a Complaint)

- ज्याला लैंगिक छळ झाला आहे (तक्रारदार), ती व्यक्ती तक्रार लिहून किंवा ई-मेलद्वारे करू शकते.
- तक्रार घटनेपासून 3 महिन्यांच्या आत करणे आवश्यक आहे. जर सलग घटना घडल्या असतील, तर शेवटच्या घटनेपासून 3 महिन्यांच्या आत तक्रार करता येईल.
- काही कारणास्तव तक्रारदार स्वतः तक्रार करू शकत नसेल, तर त्यांचा नातेवाईक, मित्र, सहकारी, किंवा महिला आयोगाचे अधिकारी तक्रार दाखल करू शकतात.
- मृत्यू झाल्यास तक्रार कायदेशीर वारस दाखल करू शकतो.
- तक्रार posh@recyclekaro.com या ई-मेलवर किंवा अंतर्गत समितीच्या कोणत्याही सदस्याकडे करता येईल.
- तक्रारीतील सर्व माहिती गोपनीय ठेवली जाईल

6. चौकशी प्रक्रिया (Processing of Complaint)

- तक्रार मिळाल्यावर IC (अंतर्गत समिती) चौकशी सुरू करेल.
- आरोपीला (Respondent) तक्रारीची प्रत 7 दिवसांच्या आत दिली जाईल.
- आरोपीने 10 दिवसांच्या आत लेखी उत्तर द्यायचे आहे.
- चौकशी जास्तीत जास्त 90 दिवसांत पूर्ण केली जाईल.
- चौकशीदरम्यान दोन्ही बाजूंना आपली बाजू मांडण्याची संधी मिळेल.
- चौकशी गोपनीय ठेवली जाईल

7. मध्यस्थी (Conciliation)

- तक्रारदाराच्या लेखी विनंतीनुसार समिती मध्यस्थी (समेट) करण्याचा प्रयत्न करू शकते.
- मात्र, पैशावर तोडगा काढला जाणार नाही.
- जर दोन्ही बाजूंनी समेट मान्य केला तर चौकशी थांबवली जाईल.
- समेटातील अटी पाळल्या नाहीत, तर चौकशी पुन्हा सुरू होईल.

8. तात्पुरती उपाययोजना (Interim Measures)

तक्रार प्रलंबित असताना समिती व्यवस्थापनाला खालील उपाय सुचवू शकते:

- आरोपीचे किंवा तक्रारदाराचे दुसऱ्या ठिकाणी बदली करणे
- तक्रारदाराला जास्तीत जास्त 3 महिन्यांची सुट्टी देणे
- आरोपीला तक्रारदाराच्या कामाचे रिपोर्टिंग न देणे
- आरोपीला तक्रारदाराशी थेट संपर्क साधण्यास मनाई करणे
- चौकशीदरम्यान तक्रारदार सुरक्षित राहील याची खात्री करणे

9. शिक्षा / कारवाई (Actions & Punishments)

जर चौकशीमध्ये आरोप खरे ठरले, तर व्यवस्थापन खालील शिक्षा करू शकते:

- आरोपीकडून लेखी माफी मागवणे
- इशारा देणे आणि फाईलमध्ये नोंद ठेवणे
- बढती/पगारवाढ रोखणे
- पद कमी करणे किंवा निलंबन करणे
- नोकरीतून बडतर्फ करणे
- समुपदेशन (Counselling) सत्र घेणे
- समाजोपयोगी काम करवून घेणे
- तक्रारदाराला नुकसानभरपाई (compensation) देण्याचे आदेश देणे

जर तक्रार खोटी किंवा खोट्या पुराव्यावर आधारित असल्याचे सिद्ध झाले, तर तक्रारदारावरही कारवाई होऊ शकते. पण फक्त पुरावे पुरेसे नाहीत म्हणून तक्रारदारावर कारवाई केली जाणार नाही.

10. अपील प्रक्रिया (Appeal)

- IC च्या शिफारशीवर समाधान नसेल तर तक्रारदार किंवा आरोपी 90 दिवसांच्या आत अपील करू शकतात.
- महिला तक्रारदारांच्या प्रकरणात – अपील कायदेशीर प्राधिकरणाकडे करता येईल.
- इतर प्रकरणात – अपील HR प्रमुखाकडे करता येईल.

11. गोपनीयता नियम (Confidentiality)

- तक्रारीतील तपशील, तक्रारदार/आरोपी/साक्षीदार यांची नावे, चौकशीची माहिती कोणालाही प्रेस, मीडिया किंवा सार्वजनिक ठिकाणी उघड केली जाणार नाही.
- फक्त सरकारला आवश्यक ती माहिती दिली जाऊ शकते.
- गोपनीयता भंग करणाऱ्या व्यक्तीवर दंड (₹5,000) व इतर शिस्तभंग कारवाई केली जाईल.

12. इतर महत्वाचे मुद्दे (Other Remedies)

- तक्रारदाराला कायद्याने मिळणारे इतर हक्क वापरण्याचा अधिकार आहे.
- अल्पवयीन (18 वर्षांखालील) प्रकरणांमध्ये *POCSO Act* लागू होईल.
- तक्रारदार किंवा साक्षीदाराला चौकशीदरम्यान संरक्षण व भेदभावमुक्त वातावरण दिले जाईल.

13. धोरणात बदल (Policy Owner)

- कंपनीला हे धोरण वेळोवेळी बदलण्याचा अधिकार आहे.
- बदल सर्व कर्मचाऱ्यांना कळवले जातील.
- चांगल्या हेतूने तक्रार केलेल्या व्यक्तीवर कुठल्याही प्रकारची प्रतिशोधात्मक कारवाई होणार नाही