

WONDERWORKS PRIVATE LIMITED  
Policy against Sexual Harassment at Workplace

**WONDERWORKS PRIVATE LIMITED**

**Policy against SEXUAL HARRASMENT**  
**At Workplace**

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#### **IT'S RULES AND CONSTITUTION**

##### **1. PRELIMINARY**

This committee will be called as Internal Committee (earlier known as Internal Committee before the amendment in 2016) for prevention and prohibition of sexual harassment and redressal against complaints of sexual harassment of working women at the workplace as per Sexual Harassment of Women At Workplace (Prevention, Prohibition And Redressal) Act, 2013 read with Sexual Harassment of Women At Workplace (Prevention, Prohibition And Redressal) Rules, 2013. This Internal Committee shall have the power/jurisdiction to deal with complaints of sexual harassment of working women as per the rules explained hereunder.

##### **2. APPLICABILITY**

These rules shall be effective on **all employees of M/s WonderWorks Private Limited at all locations.**

##### **3. DATE OF APPLICABILITY**

These rules shall come into operation w.e.f. **28<sup>th</sup> June 2022**

##### **4. DEFINITIONS**

In these rules unless the context otherwise required, -

- i) “**Act**” means the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013.
- ii) “**Aggrieved woman**” means any woman of any age whether employed or not and includes a woman employed or not, including regular, contractual, temporary, adhoc, daily wager, trainee and visitors who alleges to have been subjected to any act of sexual harassment at the work place/ establishment.
- iii) “**Complaint**” means a complaint made by the complainant/ aggrieved woman as provided in these rules.
- iv) “**Complainant**” means any aggrieved woman making in writing a complaint of sexual harassment at work place to the Internal Committee.
- v) “**Defendant or Respondent**” means a person against whom the complaint of sexual harassment has been made.
- vi) “**Establishment**” means **M/s WonderWorks Private Limited** including its offices situated at all locations.
- vii) “**Employee**” means a person employed at workplace for any work on regular, probationer, temporary, ad-hoc or daily wages basis either directly through an

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agent including a contractor or trainee or apprentice whether for remuneration/ stipend or not and also includes any worker engaged by contractor.

- viii) **“Employer”** means **M/s WonderWorks Private Limited.**
- ix) **“Internal Committee”** means Internal Committee constituted as mentioned in these rules to dispose of the matters pertaining to matter of sexual harassment at the work place.
- x) **“Incident”** means an incident of sexual harassment.
- xi) **“Management”** means Chairman / Managing Director / Director / General Manager / Manager / Departmental Head or such other officer or nominee as authorized in this regard by the Company.
- xii) **“Member”** means a member of Internal Committee as nominated by management of the establishment under these rules.
- xiii) **“Presiding Officer”** means the presiding officer of the Internal Committee nominated by the management and she will be amongst the employees employed at managerial level in the establishment or any other branch or office of the organization.
- xiv) **“Section”** means a section of Sexual Harassment of Women At Workplace (Prevention, Prohibition And Redressal) Act, 2013
- xv) **Sexual Harassment**

Without prejudice to the general meaning of the word sexual harassment of woman employee and with the exclusion of any consensual conduct between the employee, it includes anyone or more of unwelcome acts or behaviour whether directly or by implication, namely the following: -

- a) Physical contact and advances
- b) A demand or request for sexual favours
- c) Making sexually colored remarks to woman employee or
- d) Showing pornography or
- e) Any other unwelcome physical, verbal or non-verbal conduct of sexual nature
- f) 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 may amount to sexual harassment:
  - (i) Implied or explicit promise of preferential treatment in her employment; or
  - (ii) implied or explicit threat of detrimental treatment in her employment: or

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- (iii) implied or explicit threat about her present or future employment status; or
- (iv) interference with her work or creating an intimidating or offensive or hostile work environment for her; or
- (v) humiliating treatment likely to affect her health or safety.

In addition to the instances mentioned hereinabove, any other acts or behavior, which outrages the modesty of a female employee, will be considered asexual harassment.

- xvi) “**Special Educator**” means a person trained in communication with people will special needs in a way that addresses their individual differences and needs.
- xvii) “**Workplace**”, means and includes any place where an aggrieved woman or defendant or both is/are employed or work(s), or visit(s) in connection with work during the course of or arising out of employment in the establishment or any place visited by employee arising out of or during course of employment including travelling / such journey through transportation provided by the employer or any place arising out of employment of the employee / associate during the course employment which shall include but not limited to working from home for a specified period.

## 5. OBJECTIVES

- (a) The Sexual harassment of a woman at work place is matter of great concern for management. It is not only a social evil but a grave criminal offence too. It can destroy the dignity and freedom of a woman. It is essential to give due recognition to concept of gender equality and to increase the awareness of gender justice and at the same time to increase the effort to guard against any kind of sexual harassment to a woman employee. Sexual harassment infringes the fundamental right of a woman to gender equality under Article 14 of Constitution of India and her right to life and live with dignity under Article 21 of Constitution of India, which includes right to a safe environment from sexual harassment. Equality in employment can be seriously impaired if a woman is subjected to gender specific violence, such as sexual harassment at workplace. The fundamental rights of a woman to life and liberty and to practice any profession depend upon the availability of a safe working environment with respect and dignity. Right to protection from sexual harassment and right to work with dignity are recognized as universal human rights by international conventions and instruments such as Convention on the Elimination of all Forms of Discrimination Against Women (CEDAW), which have been ratified by the Govt. of India. Bill in this regard was passed. The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2012 has already received the assent of President of India on 22.04.2013 and the same was published for general information on 23.04.2013. Now the rules have also been notified under

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said Act by the Government vide notification dated 09.12.2013 and effective from 09.12.2013.

- (b) All concerned shall take cognizance of the fact that the Company strongly opposes sexual harassment which is also prohibited in its terms of employment. Commission of any act of sexual harassment as defined in the Act and in this Policy shall result in strict disciplinary action. Thus the main object of Internal Committee is to take all appropriate steps to deter/prevent and prohibit any act of sexual harassment and ensure safe working environment at the work place and in case of occurrence of such act, prompt initiation of redressal process in a manner explained in these rules. The employer will also bring the awareness among its employees by various means as suggested in the rules. The names and the contact numbers of the members of the internal committee will also be made aware to the employees and be displayed at conspicuous places of the establishment.

#### **6. CONSTITUTION OF INTERNAL COMMITTEE**

##### **(i) MEMBERS OF INTERNAL COMMITTEE**

- (a) There will be the Internal Committee having not less than four members to deal with matters of sexual harassment who will be nominated by the management of the establishment as explained in these rules. Out of these, not less than half of the total members shall be women. One member will be Presiding Officer of the Internal Committee, who shall be a woman employed at managerial level in the establishment or any office or other unit of the organization.
- (b) Two members, preferably one male and one female, from the establishment shall be member of Internal Committee preferably committed to cause of women or having experience in social work or having legal knowledge.
- (c) One or more member of Internal Committee from amongst NGO (Non-Government Organization) or association or body, which is committed to cause of woman or person familiar with the issues relating to sexual harassment.
- (d) The member appointed other than the employees of the establishment, shall be paid fee and travelling expenses. The following persons have been nominated by the company and shall be members of IC at the Corporate Office:

Sl. No.	Name	Designation	Membership
1.	Ms. Mamta Chauhan	Deputy General Manager-Accounts	Presiding officer
2.	Mr.Raju Singh Tomer	Company Secretary & Head Legal	Member

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3.	Ms. Parul Nakra	Company Secretary	Member
4.	Mr. Anuj Singh	Assistant Manager-HR	Member
5	Ms. Rishika Dhawan	Advocate & Member NGO	External Member

The following persons have been nominated by the Company and shall be the members of IC at the Factory:

<b>Sl. No.</b>	<b>Name</b>	<b>Designation</b>	<b>Membership</b>
1.	Ms. Mamta Chauhan	Deputy General Manager-Accounts	Presiding officer
2.	Ms. Parul Nakra	Company Secretary	Member
3.	Mr. Jayanta Kumar Mahatha	Senior Manager-HR & Administration	Member
4.	Mr. Rohit Kumar Sharma	Deputy Manager- Production	Member
5.	Mr Manoj Kumar Srivastava	Assistant Manager- Engineering	Member
6.	Ms. Rishika Dhawan	Advocate & Member NGO	External Member

**(ii) CESSATION OF MEMBERSHIP**

(a) The management can withdraw nomination of any member including Presiding Officer;

- i. if he/she violates any rules of Internal Committee; or discloses the identity of aggrieved woman, respondent and witnesses or any information relating to conciliation and enquiry proceedings, recommendation of the internal committee to the public, press or media in any manner apart from imposing the fine of Rs. 50,000/- (Rupees Fifty Thousand) as penalty as provided under said Act and the rules made thereunder.
- ii. he/she has been convicted for an offence or an enquiry into an offence under any law for the time being in the force is pending against him/her or
- iii. he/she has been found guilty in any disciplinary proceedings or a disciplinary proceeding is pending against him/her or
- iv. He/she has so abused his/her position as to render his continuance in office prejudicial to the public interest.

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***In such cases the management will nominate another person as member at place of such member for unexpired tenure of Internal Committee.***

- (b) If any Member of Internal Committee resigns from the membership of Internal Committee, the management will nominate another person as member in place of such member for unexpired tenure of Internal Committee.
- (c) If any member of this Internal Committee, who is in employment of the establishment, leaves the employment or who is discharged/ dismissed/ terminated or any such termination is in dispute or the employee is put under suspension or disciplinary proceeding is going on against such member, then automatically he/she will cease to be the member of this Internal Committee. The management will nominate another person as member at place of such member for unexpired tenure of Internal Committee.
- (d) In case any member dies or he ceases to be member for any other reason, the management shall nominate any other person at his/her place for unexpired tenure of Internal Committee.

#### **7. TENURE OF EXECUTIVE MEMBERS**

- (a) The term of Internal Committee shall be for three years. Thereafter new members will be nominated. However, the Internal Committee will continue to function after expiry of its tenure till the nomination of new presiding officer and members of Internal Committee and the acts done or decisions taken by the outgoing Internal Committee during such period shall be enforceable and binding. The management can extend the tenure of Internal Committee for further terms.
- (b) If a member of Internal Committee is junior in the hierarchy of the Company to the defendant in the proceedings before it, then for that particular case, the said member shall be substituted by any other additional member nominated by the management for that matter only.

#### **8. GENERAL AND EMERGENCY MEETING**

The Internal Committee shall hold generally one meeting in three months. However, in case, any complaint is reported pertaining to subjection of sexual harassment, the Committee shall hold emergency meeting immediately as per its discretion and will proceed further in accordance with the provisions of these rules as it may deem fit for the proper redressal, prevention and prohibition of sexual harassment at workplace.



**9. QUORUM OF MEMBER FOR HOLDING MEETING**

The minimum number for quorum for holding any meeting of the Committee shall not be less than three members, provided the Presiding Officer and External Member shall remain present in the meeting.

**10. FILING OF COMPLAINT**

- (i) The aggrieved woman will make complaint of sexual harassment in writing to the Internal Committee within period of three months from the date of incident and in case of a series of incidents, within a period of three months from the date of last incident. The complainant shall submit the complaint in writing and in six copies duly signed to the Presiding Officer at the email id [mamta.chauhan@dfmgroup.in](mailto:mamta.chauhan@dfmgroup.in) or [posh-wonderworks@dfmgroup.in](mailto:posh-wonderworks@dfmgroup.in) along with supporting documents and addresses of the witnesses. The complaint shall contain all material and relevant details concerning the alleged Sexual Harassment including the name of the respondent, the nature of the harassment, the dates and details of the incidents, names of witnesses and any evidence that support the allegation(s). In addition it should also include the contact details of the aggrieved woman such as contact number, department and names(s) and details of the alleged harasser (respondent) etc.
- (ii) Where such complaint cannot be made in writing the Presiding Officer or any member of Internal Committee shall render all reasonable assistance to the woman for making the complaint in writing.
- (iii) The Internal Committee may extend the time limit of filing the complaint maximum for three months by giving reason to be recorded in writing, if it is satisfied that the circumstances were such which prevented the woman from filing a complaint within the said period.
- (iv) Where the aggrieved woman is unable to make a complaint on account of her physical incapacity then the complaint can be made by her relative or friend or co-worker or officer of National Commission of Women or State Women's Commission or by any person who has knowledge of the incident but with written consent of aggrieved woman.
- (v) Where the aggrieved woman is unable to make a complaint on account of her mental incapacity then the complaint can be made by her relative or friend or special educator or qualified psychiatrist or psychologist or guardian or Authority under whose care she has receiving treatment or care or by any person who has knowledge of incident jointly with her relative or friend or special educator or qualified

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psychiatrist or psychologist or guardian or Authority under whose care she has receiving treatment.

- (vi) Where the aggrieved woman is dead, a complaint may be filed by any person who has knowledge of the incident with written consent of her legal heir.
- (vii) Where the aggrieved woman 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 her written consent.
- (viii) The complaint by the aggrieved person should contain all the material and relevant details concerning the alleged sexual harassment including the name of contravener. In case the complaint is not in writing, the Internal Committee will render all reasonable assistance to the woman for making the complaint in writing.
- (ix) The Internal Committee on receipt of the complaint from aggrieved woman shall send one of the copies of complaint to the respondent/ defendant within seven days of receipt of said complaint.
- (x) The respondent/ defendant shall file his reply along with his list of documents and names and addresses of witnesses within a period not exceeding 10 working days from the date of receipt of the copy of complaint of aggrieved woman along with documents.

### **11. CONCILIATION**

- (i) Before the commencement of enquiring into the complaint, the Internal Committee may resolve the matter by conciliation, if aggrieved woman requests for the same.
- (ii) **The settlement so arrived between the parties during the conciliation shall be recorded and shall be binding upon complainant and defendant.**
- (iii) Thereafter, the copy of settlement shall be sent to the employer/management for implementing the same as per the terms of said settlement **and recommendation of the committee**. Copy of the settlement shall also be provided to the complainant as well as to the defendant.
- (iv) No monetary settlement shall be made as a basis of conciliation.
- (v) If Internal Committee is informed by the aggrieved woman that any term or condition of the settlement has not been complied with, the committee will make an enquiry into the same and will take further steps as it considers appropriate and necessary for disposal of the matter or the main complaint as the case may be.

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- (vi) In case the Complainant does not receive any response on the complaint within 15 days of making complaint, she may write to the Managing Director and / or Company secretary in writing informing about her grievance along with complete documents as submitted originally before Internal Committee.

#### **12. ENQUIRY INTO COMPLAINT**

- (i) If the settlement is not reached between the parties, the internal committee shall proceed to conduct a full and detailed inquiry into the complaint in accordance with the principles of natural justice.
- (ii) The Internal Committee shall investigate in detail into the matter of the complaint interviewing the Aggrieved Woman and Respondent and any witnesses, determining if there are individuals with direct or indirect information regarding the complaint, and, if so, by interviewing them or by obtaining information from such other persons and making such inquiries as it thinks fit. The respondent and the complainant shall have the right to adduce their respective witnesses apart from themselves subject to be cross examined by other party. The process of enquiry shall be as below:
  - a) The first stage of the inquiry would be ‘evidence of the aggrieved woman wherein aggrieved woman’s statement would be recorded and respondent shall be given the right to cross-examine the aggrieved woman on the facts/statement given by her.
  - b) After concluding the aggrieved woman’s evidence, the evidence of witnesses named by her, whom she intends to produce in support of the complaint, will be recorded one-by-one and they may also be cross-examined by the respondent, if he may so desire. Thereafter, aggrieved woman’s evidence will be concluded.
  - c) Next stage would be for recording of ‘defense evidence’ wherein first witness would be the respondent himself and the aggrieved woman will be given a chance to cross-examine him upon the submissions given by the respondent himself. After his evidence and cross-examination, statements/submissions of respondent’s witnesses shall be recorded and the aggrieved woman may cross-examine them one-by-one.
  - d) Incase IC feels that any relevant witness to the aggrieved woman needs to be examined, the IC may summon such a witness who shall be treated as an ‘independent witness’ who shall depose his/her statement/evidence before the IC and the parties to the complaint shall be given the right to cross-examine them, if they may so desire. This shall close the process of enquiry to the complaint.
  - e) After evidence of both parties is concluded, enquiry will be concluded and IC will share its findings with both the parties to submit their respective

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submissions upon it, if any and IC shall close the findings by giving reasons upon such submissions. IC shall then submit its report to the management with recommendations as per provisions law.

- (iii) IC shall record the conclusion of its findings in report in writing supported with explanations and recommendations and shall forward the same to the management within a period of 10 days from the date of completion of the enquiry.
- (iv) The committee shall have the right to terminate the enquiry proceedings or to give an ex-parte decision on the complaint, if the complainant or respondent fails, without sufficient cause, to present herself or himself for three consecutive hearings convened by Presiding Officer. The fifteen days' notice will be given to the party for passing any ex-parte order.
- (v) The party shall not be allowed to bring any legal practitioner to represent them in their case at any stage of the proceedings before Internal Committee.
- (vi) For the purpose of making an enquiry the Internal Committee shall have the same powers as are vested in his civil court under the Code of Civil Procedure, 1908 when trying a suit in respect of following matters namely:
  - a) Summoning and enforcing the attendance of any person and examining him on Oath
  - b) Requiring the discovery and production of documents and
  - c) Any other matter which may be prescribed by law from time to time.
- (vii) The parties to the complaint will be allowed to be represented by him/her and shall not be allowed to be represented by any outsider/ legal practitioner.
- (viii) The Internal Committee will generally complete its enquiry within ninety days from the date of receipt of the complaint and if more time is required then this period can be extended by the committee for proper or sufficient reasons.
- (ix) If the complainant or defendant desires to examine any witness or tender any documents before the Internal Committee, the same will be permitted. Copy of the same will be provided to the opposite party as well.
- (x) The Internal Committee shall complete the inquiry within ninety days from the receipt of the complaint and if more time is required then this period can be extended by the committee for proper or sufficient reasons.

**13. RECOMMENDATIONS BY THE COMMITTEE**

- (i) If the Internal Committee arrives at the conclusion that the allegations against the respondent have been proved, it shall recommend the appropriate punishment for the defendant to the management, which may consider for implementation of the same. The committee can recommend the management:
  - a) To take action for Sexual Harassment as misconduct in accordance with the provisions of the services rules/policy/standing orders applicable to the respondent or where there are no such rules in, such manner as may be prescribed.
  - b) In absence of service rules/policy/standing orders, either of the punishments like written apology, warning, reprimand or censure, withholding of promotion, withholding of pay rise or increment, terminating the respondent from service or undergoing a counselor session or carrying out community service.
- (ii) The committee may also recommend to the employer to restrain the defendant/respondent from reporting on work performance of the aggrieved woman or writing her confidential report and assign the same to another officer. It may also recommend deduction from the salary of respondent/ defendant such sum as it may consider appropriate to be paid to the aggrieved woman or to her legal heirs as per provisions of said Act and rules made thereunder.
- (iii) On the completion of an enquiry by the Internal Committee, if it comes to conclusion that allegations against respondent/defendant do not stand proved, then it shall recommend to employer that no action be taken against the respondent.
- (iv) In case the Internal Committee comes to the conclusion that the allegation levelled by the complainant against the respondent/defendant is malicious or the aggrieved woman or any other person making the complaint has made the complaint knowing it to be false or the aggrieved woman or any other person making the complaint has produced any forged or misleading document it may recommend the employer to take action against complainant as per the service rules and in absence of same as per principles of natural justice.
- (v) In case, if in the opinion of the Internal Committee, it is necessary that the victim needs special counseling or any other support service including the maintenance of the confidentiality of the victim, it will inform the Management about the steps to be taken in that matter. At the same time, the Committee will also see that it is not used as a shield by any woman employee for personal gain or to take a revenge from any employee at its whims and fancies.

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- (vi) During the pendency of enquiry also the Committee may recommend on the written request of the aggrieved woman to transfer the aggrieved woman or the respondent to any other work place. The employer may consider the same, if it is possible and practical as per the circumstances and options available. It may also recommend to grant the leave to the aggrieved woman maximum up to 3 months.
- (vii) The Company recognizes and expects that some claims may be difficult to prove or support or may not, in fact, be found to raise to the level of seriousness deemed necessary to constitute Sexual Harassment. These types of will not be considered to be false accusations.

#### **14. WITHDRAWAL OF COMPLAINT**

- (i) If at any stage, after filing of a complaint and during any proceedings in respect of it under these rules by the Internal Committee, the aggrieved woman wishes to withdraw the complaint, then she shall have the right to withdraw the complaint and the Internal Committee shall permit her to withdraw the complaint and if an enquiry has commenced, then the Internal Committee shall discontinue the enquiry.
- (ii) If it is brought to the notice of the Internal Committee, or the Committee is of the opinion that, pressure is being brought on the complainant or the witnesses to withdraw her complaint or not to proceed with the complaint, then the committee will record the same and will take further action as it may deem fit and proper under those circumstances.

#### **15. CONFIDENTIALITY**

- (i) Given the serious nature of cases of Sexual Harassment and their impact on the victim as well as the person against whom such allegations are leveled, the parties to the complaint, their witnesses and the Company is committed to maintaining strict confidentiality in relation to such complaints and the resultant enquiry.
- (ii) The Contents of Complaint, the identity and address of the aggrieved woman, respondent and witnesses, any information relating to conciliation and inquiry proceedings, findings, report, recommendations of the Internal Committee, any document or any verbal communication and/or the action taken by the employer under the provisions of the Act shall not be divulged, published, communicated or made known to any other employee/associate within the Company and/or outside the company, any third party, public at large, press and media in any manner; Provided that information may be disseminated regarding the justice secured to any victim of sexual harassment under this Act without disclosing the name, address, identity or any other particulars calculated to lead to the identification of the aggrieved woman and witnesses;
- (iii) Where any person entrusted with the duty to handle or deal with the complaint, inquiry or any recommendations or action to be taken under the provisions of this

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Act, contravenes the provisions of section 16, he shall be liable for penalty in accordance with the provisions of the service rules applicable to the said person or where no such service rules exist, in such manner as may be prescribed.

#### **16. GENERAL PROVISIONS**

- (i) The employer will promote and facilitate measures taken in the establishment for prevention of sexual harassment and to ensure a safe work environment free from sexual harassment including prevention and deterrence. It will also educate the employees with the issue of sexual harassment and procedure for redressal by way of holding workshops or meetings.
- (ii) A brief shall be given to all the existing employees regarding the features of this policy immediately on formulation of this policy and to all new employees during their induction.
- (iii) The employer will also provide necessary facilities and assistance to Internal Committee for dealing/redressing the complaint and conducting an enquiry.
- (iv) The employer will also follow the directions given by Internal Committee for disposal of complaint. It will ensure that the complainant or supporter or witness is not victimized, harassed or discriminated against for initiating or supporting or giving evidence in proceedings under these rules nor it will alter to the prejudice of the aggrieved woman or witness or representative concerned, the conditions of service prevailing immediately prior to the complaint being lodged as a consequence to the making and prosecuting of a complaint under these rules.
- (v) The employer will also provide assistance to the complainant if she chooses to initiate criminal proceedings against the defendant. It may consider request of the complainant for her own transfer or the transfer of defendant to any other department or other place of the establishment, which is in existence or may have establishment in future and management will consider the same as per facts and circumstances of the matter.
- (vi) The employer will also monitor timely submission of report by Internal Committee. The management will always maintain good working conditions in respect of work, leisure, health and hygiene as it is providing now, to ensure that there is no hostile environment towards women at workplace and no woman employee has ground to believe that she is disadvantaged in connection with her employment.

#### **17. THIRD PARTY SEXUAL HARASSMENT**

In case any matter of sexual harassment occurs as a result of an act or omission by any third party or outsider or by employee of a company against third party, being guest or visitor or any other person dealing with company in any manner, in the premises of the establishment, even then, the Committee will take all steps necessary and reasonable to assist the effected person in terms of support and preventive action.

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#### **18. SUBMISSIONS OF ANNUAL REPORT**

The Internal Committee will also make an annual report and will submit the same to the Management. The copy of the same will be made available to the appropriate Authority/District Officer in the prescribed manner giving the number of complaints of sexual harassment received in the year, number of complaints disposed of during the year, number of cases pending for more than 90 days, number of workshop or awareness programs carried out against the issue of sexual harassment and the nature of action taken by the employer.

#### **19. APPEAL**

The aggrieved woman/ complainant or the defendant/ respondent or any person aggrieved from the recommendation made by the Internal Committee may prefer an appeal to the Appellate Authority notified under Industrial Employment (Standing Orders) Act, 1946 within 90 days of the recommendations made by the Internal Committee as provided under said Act and the rules made thereunder.

20. The copy of this Internal Committee will be kept displayed on the notice board to create awareness among the female employees about their rights against sexual harassment.
21. The object of awareness among female employees will also be achieved by way of publication or in any other manner or by circulation of draft of this Internal Committee among employees.
22. The management shall take all necessary and reasonable steps to prevent and ensure that no woman is subject to sexual harassment in her workplace by any third party and where any such sexual harassment occurs; the management shall take all necessary and reasonable steps to assist the aggrieved woman to redress the act of sexual harassment.
23. The management for the implementation of these rules will recognize that confidentiality is important and will respect the confidentiality and privacy of complainant or defendant, to the extent reasonably possible.