



Date: 30/04/2024

To,

**District Officer, POSH Act, 2013 – Cum –  
Additional Deputy Commissioner, Gurugram  
Vikas Sadan Opp. Mini Secretariat,  
Near Rajiv Chowk, Gurugram 122001  
Ph.0124-2332363  
Email- [posh-grg.rev@hry.gov.in](mailto:posh-grg.rev@hry.gov.in)**

Dear Sir/Madam,

**Re: Annual Return under Sexual Harassment of women at workplace (prevention, Prohibition, and Redressal) Act, 2013 for the year ended December 2023**

We enclosed herewith the Annual Return (All India) under Sexual Harassment of woman at workplace (Prevention, prohibition, and Redressal) Act 2013, with regards to Complaints received and their Redressal for the year ended 31st December 2023.

Please find Compliance Checklist, List of ICC members, LCC members and details of seminar/webinar attached in support of the report.

Thanking You

Yours faithfully,

**For VDOIT Technologies Limited**

**Narinder**

**Kumar Kamra**

Digitally signed by  
Narinder Kumar Kamra  
Date: 2024.04.30  
18:16:08 +05'30'

**Authorized Signatory**

**Narinder Kumar Kamra**

**Managing Director**

**VDOIT Technologies Limited (Simplify the World)**

CIN: U72200HR2015PLC054827 | GST: 06AAFV0553M1Z5

Unit-912, Emaar Palm Square, Golf Course Extension Road, Sector-66, Gurgaon, Haryana, 122011

T +91 880-066-5460 | E. [info@vdoit.in](mailto:info@vdoit.in) | [www.vdoitech.com](http://www.vdoitech.com)



**Report of the committee in respect of Complaints received during the year under the year under the Prevention of Sexual Harassment at the Workplace Act, 2013 and Rules framed there under as per Section 21 of the Act:**

To,  
**Additional Deputy Commissioner-cum-Chairman  
Local Complaints Committee for  
Prevention of Sexual Harassment at Workplaces,  
Gurgaon**

**Annual Report for the year 2023 Under Section 21 of Prevention of Sexual Harassment at the Workplace Act of 2013.**

- a. No. of Complaints received during the year: NIL
- b. No. of Complaints disposed off during the year: NA
- c. No. of Cases pending for more than 90 days: NA
- d. No. of Workshops or Awareness Programmes against Sexual Harassment carried out: 2
- e. Nature of action taken by employer of District Officer

**For VDOIT Technologies Limited**

**Narinder**

**Kumar Kamra**

**Authorized Signatory**

**Narinder Kumar Kamra**

**Managing Director**

Digitally signed by Narinder  
Kumar Kamra  
Date: 2024.04.30 18:16:50  
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To,

Additional Deputy Commissioner,  
Gurugram-cum-District Officer  
under POSH Act, 2013,  
Vikas Sadan, Opp. Mini Secretariat,  
Near Rajiv Chowk,  
Gurugram 122001

**Subject: POSH ACT COMPLIANCE CHECKLIST (COMPREHENSIVE).**

This is to bring to your urgent attention about the formation of an Internal Committee is Legally mandated by the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 ("POSH Act, 2013"). As per the POSH Act, it is mandatory for the Internal Committee to provide an Annual Report in the prescribed format to the District Officer.

You are hereby directed to submit the Annual Report of your organisation pertaining to compliance under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and redressal) Act, 2013 for the year 1<sup>st</sup> January, 2023 to 31<sup>st</sup> December, 2023.

**1. Policies:**

i) Have you prepared and implemented an internal POSH policy for prohibition, prevention and redressal of sexual harassment at the workplace intended to promote gender sensitive safe spaces and remove underlying factors that contribute towards a hostile work environment against women in your organization?

If yes, please state the reference number of the policy: **YES, Policy/POSH/01**

ii) Is sexual harassment specified as a form of misconduct under your employment contract or service rules, or the Standing Orders (if Standing Orders are applicable to your business)? **YES**

If yes, please state the reference number. **STANDING ORDERS NOT APPLICABLE**

iii) Have you created an Internal Committee (IC) at your office (or offices) as required under the POSH Act, 2013? **YES**

**2. Notices:**

i) Have you displayed at conspicuous places in the workplace sufficient notices informing employees about your organization's stance on sexual harassment and the consequences of indulging in such acts? **YES**

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If yes, please attach a sample of the notice and also mention where this notice is displayed (e.g. at the notice board at the entrance of the workplace etc.) **NOTICE BOARD AT THE ENTRANCE (ATTACHED)**

ii) Have you provided sufficient information about the members of the IC at prominent places in the workplace in Hindi as well as English and regional language (applicable if you have employees/vendors/sub-vendors/contract labours/visitors etc. from a particular region who cannot read English or Hindi), so that employees and staff can reach out to them. **YES**

If yes, please attach a sample of display and also mention where this notice is displayed (e.g. at the notice board at the entrance of the workplace etc.) **YES (NOTICE BOARD)**

### **3. Employee awareness and assistance:**

i) Do you organise workshops, awareness programmes or seminars at regular intervals to sensitize employees about the stance of your organization on sexual harassment and about the consequences of engaging in any conduct that amounts to sexual harassment? **YES**

If yes, please provide the date and number of workshops conducted in the calendar year 2023 (1<sup>st</sup> January, 2023 to 31<sup>st</sup> December, 2023). **2, 24<sup>th</sup> June, 2023 & 28<sup>th</sup> December, 2023.**

- Physical (in-person) orientation programme. **NO, Conducted in Virtual mode only.**
- Virtual orientation programme-
  - I. Instructor-led virtual orientation programme: **YES**
  - II. E-learning modules (educational materials and instructions), also mentioning the language(s) in which the E-learning module is disseminated English & Hindi **YES**

ii) Have you covered all your employees (including contractual staff like security guards, washroom attendants, labourers, drivers, loaders etc.) in these awareness programmes? **YES**

iii) Have you made efforts to make employees aware about their rights under the act? **YES**

If yes, please mention briefly about such communication. **Conducted Workshop to create Awareness about the Act.**

iv) Is there any system or process to provide assistance to an employee who has been sexually harassed, in approaching the complaints committee and in dealing with psychological and other effects of sexual harassment?

If yes, please mention briefly about the system: **Provided necessary steps to be followed when an employee is aggrieved.**



v) Does your organization provide assistance to the harassed individual to make criminal complaint in the police station under the Indian Penal Code (45 of 1860) or any other law for the time being in force? **YES if required....no case reported so far**

**4. Internal Committee:**

(Section 4 (i) of the act states that every employer of a workplace shall, by an order in writing, constitute a Committee to be known as "Internal Committee" (Please attach order copy showing constitution of the Internal Committee).

Please note that where the offices or the administrative units of the workplace are located at different places or divisional or sub-divisional level, the Internal Committee shall be constituted at all administrative units or offices.

Do you have required number of members in the IC as per the conditions laid down in the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013? **YES**

If yes, details of the Internal Committee formed in your office are to be provided in below mentioned

Sr. no	Details of member of IC	Name	Official Designation	Contact detail & email-id	Remarks
1	Chairperson (F)	Neetu Gupta	Whole Time Director	8800552860 & Neetu.Gupta@vdoit.in	----- --
2	Member	Vinita Bansal	Chief Financial Officer	99711 66901 & Vinita.Bansal@vdoit.in	----- --
3	Member	Abhinav Agrawal	Sr. Manager operations	9810723276 & Abhinav.agrawal@vdoit.in	----- --
4	Member	Shilpa	Company secretary	9718412072 & Shilpa.vdoit@gmail.com	
5	Member (NGO)	Adv Shikha Kataria	External Member	9310541827 & advshikhakataria@gmail.com	

Have you conducted an orientation program for the IC members?

If yes, please provide dates of such programmes: **YES**

Do you conduct capacity and skill building workshops for the IC members? **YES**



If yes, please provide the year wise the number of workshops conducted in year 2022 & 2023. **2, 24<sup>th</sup> June, 2023 & 28<sup>th</sup> December, 2023.**

Do you provide necessary facilities to the IC for dealing with sexual harassment proceedings? **YES**

### **5. Compliance with complaints committee recommendations**

Have you followed the recommendations of the IC/LC (as applicable) regarding the interim measures? **NO CASE REPORTED**

Have you implemented the IC/LC's (as applicable) recommendations as per the final award in the prescribed time period? **NO CASE REPORTED**

Do you monitor functioning and performance of the IC at a broad level? **NO – Not reported any complaints yet**

For example: whether the complaints follow the prescribed time limits and procedures? Whether conciliation and the interim measures were considered?

### **6. Reports:**

Does the IC forward an annual report containing necessary details of sexual harassment case proceedings to the prescribed authorities? **NOT APPLICABLE AS NO CASE REPORTED**

Do you include information about pending and resolved sexual harassment cases in the annual report of your company, as required under Section 22 of the PoSH Act? **IF APPLICABLE THEN YES WE WILL REPORT**

If yes, please share an extract of this reporting. **NOT APPLICABLE**

As mentioned in Companies (Accounts) Rules, 2014 under Rule 8, have you included a statement that your company has complied with provisions relating to the constitution of Internal Committee under the PoSH Act, 2013? **YES**

If yes, please share an extract of this reporting. **ATTACHED**



## 7. Annual Report:

Attached your annual report which the Complaints Committee is required to prepare us 2lof the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, mentioning the following details: -

No. of Complaints of Sexual Harassment received in the year	NIL
No. of Complaints disposed off during the year	NIL
No. of Complaints pending for more than ninety days.	NIL
No. of workshop or awareness programme against sexual harassment carried out.	TWO
Nature of action taken by employer of District Officer	No Compliant Received Yet

Please note that formation of an Internal Committee and submission of required details and annual report as specified in Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, is legally mandatory; failure to comply with provisions of the Act will be subject to penalty as prescribed in the said Act.

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का नीति दस्तावेज़

कार्यस्थल पर यौन उत्पीड़न को रोकने के लिए आंतरिक शिकायत  
समिति

एक लिंग-तटस्थ नीति

सभी कर्मचारियों के लिए एक सुरक्षित और संरक्षित कार्यस्थल वातावरण बनाने का प्रयास

(VDOIT टेक्नोलॉजीज लिमिटेड) के लिए दिशानिर्देश



## कार्यस्थल पर यौन उत्पीड़न के विरुद्ध नीति

### I. प्रस्तावना

भारत की संसद ने वर्ष 2013 में "कार्यस्थल पर महिलाओं का यौन उत्पीड़न (रोकथाम, निषेध और निवारण ) अधिनियम" पारित किया। यह अधिनियम कार्यस्थल पर महिलाओं के यौन उत्पीड़न के खिलाफ सुरक्षा प्रदान करता है और यौन उत्पीड़न की शिकायतों की रोकथाम और निवारण करता है। उत्पीड़न और उससे जुड़े या उसके आनुषंगिक मामलों के लिए।

दिशानिर्देश स्पष्ट रूप से निम्नलिखित बताते हैं:

*"कार्यस्थलों या अन्य संस्थानों में नियोक्ता या अन्य जिम्मेदार व्यक्तियों का यह कर्तव्य होगा कि वे यौन उत्पीड़न के कृत्यों को होने से रोकें या रोकें और यौन उत्पीड़न के कृत्यों के समाधान, निपटान या अभियोजन के लिए प्रक्रियाएं प्रदान करें।" सभी चरणों की आवश्यकता है।"*

पब्लिक लिमिटेड कंपनियां भी सुप्रीम कोर्ट के निर्देश और अधिनियम से बंधी हैं। वीडिओआईटी टेक्नोलॉजीज लिमिटेड एक ऐसा वातावरण बनाने और बनाए रखने के लिए प्रतिबद्ध है जो सभी प्रकार की लैंगिक हिंसा, यौन उत्पीड़न और लिंग/लिंग के आधार पर भेदभाव से मुक्त हो। इसके बाद, कंपनी अपने अधिकार क्षेत्र में आने वाले सभी लोगों के उपर्युक्त मानवाधिकारों को सुनिश्चित करने वाले संवैधानिक आदेश को बनाए रखने के लिए प्रतिबद्ध है। अधिनियम के निर्देशानुसार वीडिओआईटी टेक्नोलॉजीज लिमिटेड ने "कार्यस्थल पर महिलाओं के यौन उत्पीड़न को रोकने के लिए आंतरिक शिकायत समिति" नामक एक समिति का गठन किया है। उपरोक्त तथ्यों को ध्यान में रखते हुए निम्नलिखित नीति बनाई गई है।

### II. उद्देश्य

यौन उत्पीड़न को रोकना आंतरिक शिकायत समिति का उद्देश्य कार्यस्थल पर निम्नलिखित हैं:

- कंपनी में यौन उत्पीड़न के खिलाफ एक नीति विकसित करना।
- कंपनी में यौन उत्पीड़न के मामलों और लिंग आधारित हिंसा के अन्य कृत्यों की रोकथाम और निवारण के लिए एक स्थायी तंत्र विकसित करना।
- शिकायतों की उचित रिपोर्टिंग और उनकी अनुवर्ती प्रक्रियाओं के माध्यम से नीति का अक्षरशः कार्यान्वयन सुनिश्चित करना।
- लिंग आधारित भेदभाव से मुक्त वातावरण प्रदान करने की कंपनी की प्रतिबद्धता को कायम रखना।

- यौन उत्पीड़न के किसी भी कृत्य को रोकने के लिए एक सुरक्षित शारीरिक और सामाजिक वातावरण बनाना।
- विभिन्न रूपों में यौन उत्पीड़न के बारे में जागरूकता बढ़ाने के लिए एक सामाजिक और मनोवैज्ञानिक वातावरण को बढ़ावा देना।

### III. यौन उत्पीड़न की परिभाषा (अधिनियम के अनुसार)

कार्यस्थल पर महिलाओं का यौन उत्पीड़न (रोकथाम, निषेध और निवारण) अधिनियम 2013 के अनुसार, यौन उत्पीड़न

इसमें निम्नलिखित में से कोई एक या अधिक अवांछित कार्य या व्यवहार (चाहे प्रत्यक्ष रूप से या निहितार्थ द्वारा) शामिल हैं :

1. शारीरिक संपर्क और प्रगति; या
2. यौन संबंधों की मांग या अनुरोध; या
3. कामुक टिप्पणियाँ करना; या
4. अश्लील साहित्य दिखाना; या
5. यौन प्रकृति का कोई अन्य अवांछित शारीरिक, मौखिक या गैर-मौखिक आचरण।

निम्नलिखित मामलों के दायरे में आने वाले किसी भी कार्य को यौन उत्पीड़न की घटना माना जाएगा (अवांछनीय कृत्यों या व्यवहार का स्पष्टीकरण):

- a) जब अवांछित यौन प्रस्तावों के प्रति समर्पण, यौन अनुग्रह के लिए अनुरोध , तथा यौन प्रकृति का मौखिक या शारीरिक आचरण, स्पष्ट या अप्रत्यक्ष रूप से, किसी व्यक्ति के किसी गतिविधि में संलग्न होने के मार्गदर्शन, रोजगार, भागीदारी या मूल्यांकन की शर्त बना दिया जाता है।
- b) जब अवांछित यौन प्रस्ताव, तथा मौखिक, गैर-मौखिक और/या शारीरिक आचरण जैसे कि भारी टिप्पणियाँ, टिप्पणियाँ या चुटकुले, पत्र, फोन कॉल या ई-मेल, इशारे, अश्लील साहित्य का प्रदर्शन, घृणास्पद नजरें, शारीरिक संपर्क, पीछा करना, अपमानजनक प्रकृति की आवाजें या प्रदर्शन।
- c) उसके काम में हस्तक्षेप करना या उसके लिए डराने वाला, आक्रामक या शत्रुतापूर्ण वातावरण बनाना।
- d) जब कोई व्यक्ति किसी अन्य व्यक्ति के साथ यौन प्रयोजन के लिए उसके शरीर या उसके किसी भाग या शरीर के विस्तार के रूप में किसी वस्तु का उपयोग उसकी सहमति के बिना या उसकी इच्छा के विरुद्ध करता है, तो ऐसा आचरण यौन हमला माना जाएगा।
- e) जब अपमानजनक टिप्पणियाँ, आचरण या ऐसा कोई व्यवहार व्यक्ति की लिंग पहचान/यौन अभिविन्यास पर आधारित हो और/या जब परिसर या कोई सार्वजनिक

फोरम का उपयोग किसी व्यक्ति(यों) को बदनाम करने/उनके विरुद्ध भेदभाव करने, या किसी व्यक्ति की लिंग पहचान/यौन अभिविन्यास के आधार पर शत्रुतापूर्ण वातावरण बनाने के लिए किया जाता है।

- f) किसी महिला के साथ अपमानजनक व्यवहार करता है जिससे उसके स्वास्थ्य और सुरक्षा पर असर पड़ने की संभावना हो।

#### IV. क्षेत्राधिकार

**VDOIT Technologies Limited** की सक्रिय भूमिकाओं में कार्यरत सभी कर्मचारियों पर लागू होंगे। नीति और नियम एवं विनियम उन बाहरी लोगों पर भी लागू होंगे जो नीति के दायरे में आने वाले कार्य के समय **VDOIT Technologies Limited** के क्षेत्र में हो सकते हैं।

1. यह नीति कंपनी परिसर के अंदर लागू होगी, लेकिन आधिकारिक कर्तव्य के अवसर पर परिसर के बाहर भी लागू होगी (कार्यशालाएं, क्षेत्र कार्य, **वीडीओआईटी टेक्नोलॉजीज लिमिटेड** द्वारा आयोजित भ्रमण , बाहरी लोगों के साथ साक्षात्कार/बैठक और **वीडीओआईटी टेक्नोलॉजीज लिमिटेड** द्वारा परिसर के बाहर आयोजित कोई अन्य गतिविधि जिसमें ऐसी गतिविधि के लिए यात्रा की अवधि भी शामिल है)।
2. विशेष रूप से, इस नीति में निर्धारित नियम और प्रक्रियाएं यौन उत्पीड़न की सभी शिकायतों पर लागू होंगी:
  - I. किसी कर्मचारी द्वारा कंपनी के किसी कर्मचारी के विरुद्ध, चाहे यौन उत्पीड़न परिसर के अंदर या बाहर हुआ हो।
  - II. किसी बाहरी व्यक्ति द्वारा किसी कर्मचारी के विरुद्ध अथवा किसी कर्मचारी द्वारा किसी बाहरी व्यक्ति के विरुद्ध, यदि यौन उत्पीड़न का आरोप परिसर के भीतर लगाया गया हो।

उपरोक्त में निम्नलिखित परिभाषाएँ लागू होंगी:

**वीडीओआईटी टेक्नोलॉजीज लिमिटेड** के सदस्यों में कर्मचारी (स्थायी और अस्थायी) और अन्य आगंतुक शामिल हैं।

- a. कर्मचारी से तात्पर्य कंपनी के किसी भी ऐसे व्यक्ति से है जो कंपनी में कार्यरत है, जिसमें प्रशिक्षु, प्रशिक्षु और प्रशिक्षु शामिल हैं।
  - b. किसी भी अन्य आगंतुक का तात्पर्य किसी भी उद्देश्य से कंपनी में आने वाले किसी भी व्यक्ति से है; या साक्षात्कार/प्रवेश परीक्षा/सेमिनार/कार्यशाला/सम्मेलन में उपस्थित होना/भाग लेना।
3. परिसर कंपनी क्षेत्र के भीतर सभी कार्यस्थलों को संदर्भित करता है।

4. नीति को लागू करने के लिए, एक समिति नियुक्त की जाएगी जिसकी संरचना और अधिदेश नीचे वर्णित होंगे।

## V. आंतरिक समिति का गठन

समिति में निम्नलिखित पांच सदस्य शामिल होंगे, जिन्हें निदेशक द्वारा निम्नानुसार नियुक्त किया जाएगा, अर्थात्:

1. कंपनी की एक वरिष्ठ महिला स्टाफ सदस्य, अध्यक्ष और पीठासीन अधिकारी के रूप में
2. कंपनी में दो सदस्य कार्यरत हैं (एक महिला और एक पुरुष)
3. एक बाहरी पुरुष सदस्य (अधिमानतः यौन उत्पीड़न से संबंधित मुद्दों से परिचित और जानकार)
4. प्रत्येक सदस्य का कार्यकाल तीन वर्ष का होगा। पिछली समिति के सदस्य तीन वर्ष के कार्यकाल के अंत में नई समिति के गठन तक बने रहेंगे।
5. यदि निदेशक उनके कामकाज से संतुष्ट है तो पिछली समिति के सदस्य पुनर्नियुक्ति के पात्र हैं।

## VI. अयोग्यता

किसी भी व्यक्ति को समिति का सदस्य नियुक्त नहीं किया जाएगा या बना नहीं रखा जाएगा, यदि वह है

1. सक्षम न्यायालय द्वारा दिवालिया घोषित;
2. पागल या विकृत मन का व्यक्ति;
3. नैतिक अधमता से जुड़े अपराध के लिए दोषी ठहराया गया;
4. अनैतिक तस्करी के बराबर कदाचार में शामिल;
5. किसी भी आपराधिक अपराध में दोषी ठहराया गया;
6. यौन उत्पीड़न से संबंधित किसी जांच का सामना करना या यौन उत्पीड़न का दोषी पाया जाना; किसी दुर्व्यवहार या कदाचार के लिए दंडित होना।

## VII. वैधानिक स्थिति

कार्यस्थल पर महिलाओं के यौन उत्पीड़न को रोकने के लिए आंतरिक समिति को नीति के अधिदेश को क्रियान्वित करने का अधिकार है और इसमें वैधानिक शक्तियां हैं, जो सिविल प्रक्रिया संहिता, 1908 के तहत एक सिविल न्यायालय में निहित हैं, जब निम्नलिखित मामलों के संबंध में मुकदमा चलाया जाता है:

1. किसी भी व्यक्ति (शिकायतकर्ता) को बुलाना और उसकी उपस्थिति सुनिश्चित करना /शिकायतकर्ता/गवाह) की शपथ पर जांच करना और बयान दर्ज करना
2. वैध दस्तावेजों की खोज और प्रस्तुति की आवश्यकता
3. कोई अन्य मामला जो निर्धारित किया जा सकता है

## VIII. समिति की शक्तियां एवं कर्तव्य :

समिति को नैतिक पुलिस के रूप में कार्य नहीं करना है; न ही यह किसी की निजता में दखल देगी। समिति की भूमिका यौन उत्पीड़न के बारे में जागरूकता पैदा करना और यौन उत्पीड़न के गैर-सहमतिपूर्ण कृत्यों से निपटना और दंड की सिफारिश करना है, न कि परिसर के भीतर यौन अभिव्यक्ति को रोकना है। सदस्यों से अपेक्षा की जाती है कि वे इस मुद्दे के प्रति संवेदनशील रहें और व्यक्तिगत पूर्वाग्रहों और पूर्वाग्रहों (चाहे लिंग, जाति, वर्ग पर आधारित हों) और रूढ़िवादिता (जैसे, "पीड़ित" या "आरोपी" को कैसे कपड़े पहनने चाहिए या कैसे व्यवहार करना चाहिए, इस बारे में पूर्व निर्धारित धारणाएँ) को समिति के सदस्यों के रूप में अपने कामकाज को प्रभावित न करने दें।

### A. निवारक

1. कार्यस्थल पर संपर्क में आने वाले व्यक्तियों/आगंतुकों से सुरक्षा सहित यौन उत्पीड़न से मुक्त सुरक्षित वातावरण का निर्माण और सुनिश्चित करना।
2. नीति का अंग्रेजी में व्यापक प्रचार करना, विशेष रूप से नोटिस बोर्ड और पैम्फलेट वितरण के माध्यम से
3. समिति के सदस्यों के नाम और फोन नंबर अंग्रेजी में प्रचारित करना।

### B. लिंग संवेदीकरण

लिंग संवेदीकरण में लिंग और कामुकता के मुद्दों के बारे में जागरूकता पैदा करना और लैंगिक न्याय के लिए एक सक्षम वातावरण बनाना और काम करना शामिल है जहां सभी व्यक्तिगत सुरक्षा और सम्मान की भावना के साथ मिलकर काम कर सकें। संवेदीकरण एवं जागरूकता गठित समिति का मूल कार्य होगा। निम्नलिखित तरीकों की एक सूची है जिसमें जागरूकता और संवेदीकरण कर्मचारियों का संचालन किया जाएगा:

1. की प्रकृति और दायरे पर चर्चा के लिए एक ओरिएंटेशन सेमिनार आयोजित किया जाएगा

कार्यस्थल पर महिलाओं का यौन उत्पीड़न (रोकथाम, निषेध और निवारण )

अधिनियम 2013, कैलेंडर वर्ष की शुरुआत में।

2. प्रतिवर्ष एक या अधिक कार्यशालाएँ/सेमिनार जहाँ विषय पर बाहरी विशेषज्ञ सभी कर्मचारियों के साथ बातचीत करेंगे।
3. सेमिनार, प्रदर्शन और चर्चा मंच जहाँ लिंग संवेदनशीलता और लिंग जागरूकता पर ध्यान केंद्रित किया जाएगा - ये कैलेंडर वर्ष के दौरान होंगे।
4. (कंपनी का नाम) द्वारा कार्यान्वित की जा रही नीति के बारे में अनौपचारिक सत्रों, प्रदर्शनों आदि के माध्यम से नीति और उसके कार्यान्वयन के बारे में जागरूकता फैलाना ।

### **C. उपचारात्मक**

1. शिकायतें दर्ज करने का तंत्र सुरक्षित, सुलभ और संवेदनशील होना चाहिए।
2. यौन उत्पीड़न के बारे में शिकायतों का संज्ञान लेना, जांच करना, पीड़ितों को सहायता और समाधान प्रदान करना , दंडात्मक कार्रवाई की सिफारिश करना या यदि आवश्यक हो तो उत्पीड़नकर्ता के खिलाफ तत्काल कार्रवाई करना।
3. जांच के बाद समिति में पंजीकृत किसी भी शिकायत के लिए निदेशक/प्रशासन/या संबंधित प्राधिकारियों को अनुशासनात्मक कार्रवाई की सिफारिश करना तथा अनुवर्ती कार्रवाई करना और उसकी निगरानी करना।
4. यदि शिकायतकर्ता भारतीय दंड संहिता या किसी अन्य वर्तमान कानून के अंतर्गत अपराध के संबंध में शिकायत दर्ज कराना चाहे तो कंपनी को सहायता प्रदान करने की सिफारिश करना।
5. कंपनी को शिकायतकर्ता की सहमति से या यहां तक कि ऐसे मामलों में बिना सहमति के भी चिकित्सा हस्तक्षेप प्रदान करने की सिफारिश करना जहां शिकायतकर्ता अपनी सहमति देने में शारीरिक या मानसिक रूप से अक्षम हो।
6. यदि पीड़िता चाहे तो प्रशासन को सूचित करना कि उसे उचित मनोवैज्ञानिक, भावनात्मक और शारीरिक सहायता (परामर्श, सुरक्षा और अन्य सहायता के रूप में) उपलब्ध कराई जाए।

### **IX. समिति की बैठकें :**

समिति के सदस्य वर्ष में कम से कम चार बार बैठक करेंगे। अध्यक्ष एवं पीठासीन अधिकारी बैठक की अध्यक्षता करेंगे। अध्यक्ष की अनुपस्थिति में दूसरी वरिष्ठ महिला सदस्य बैठक की अध्यक्षता करेंगी। अध्यक्ष, समिति के कुल सदस्यों में से कम से कम एक तिहाई सदस्यों के अनुरोध पर, ऐसी मांग की प्राप्ति के बाद पंद्रह दिनों के भीतर किसी तारीख को बैठक बुला सकता है।

1. समिति की बैठक का कोरम इसके चार सदस्यों से होगा। यदि किसी बैठक में कोरम पूरा नहीं होता है, तो उसे आधे घंटे के लिए स्थगित कर दिया जाएगा और उसके बाद बैठक उन सदस्यों के साथ शुरू की जाएगी जो बैठक में उपस्थित हैं।
2. सभी निर्णय बैठक में उपस्थित समिति के सदस्यों की आपसी सहमति से लिए जाएंगे। किसी भी निर्णय के संबंध में सदस्यों के बीच किसी भी असहमति की स्थिति में, समिति के अध्यक्ष को अंतिम निर्णय लेने का अधिकार होगा और उनका निर्णय अंतिम माना जाएगा।

## **X. भत्ता**

समिति के सभी बैठकों में भाग लेने वाले बाह्य सदस्यों या समिति के कार्य हेतु आने वाले किसी भी आमंत्रित अतिथि को यात्रा भत्ता दिया जाना चाहिए।

समिति का कोई भी आंतरिक सदस्य, जो सरकारी ज्यूटी या व्यक्तिगत अवकाश (गुड़गांव से बाहर) पर है, को बैठक के लिए बुलाया जाता है, तो समिति के ऐसे सदस्यों को यात्रा भत्ता दिया जाना चाहिए।

## **XI. शिकायत प्रक्रिया**

1. किसी भी महिला/कर्मचारी या परिवीक्षाधीन या यहां तक कि एक छात्र (इसके बाद 'शिकायतकर्ता' के रूप में उल्लिखित) को किसी भी कर्मचारी/संकाय/प्रशासनिक कर्मचारी/अनुसंधान कर्मचारी/किसी भी सदस्य के खिलाफ यौन उत्पीड़न सहित किसी भी उत्पीड़न के संबंध में शिकायत दर्ज करने का अधिकार होगा। जैसा भी मामला हो, समिति (इसके बाद 'शिकायतकर्ता' के रूप में उल्लिखित)।
2. कोई भी शिकायतकर्ता घटना की तारीख से 3 महीने की अवधि के भीतर शिकायत दर्ज कर सकता है। घटनाओं की एक श्रृंखला के मामले में, शिकायतकर्ता को अंतिम घटना की तारीख से 3 महीने की अवधि के भीतर मामला दर्ज करना चाहिए।
3. जहां पीड़ित कर्मचारी अपनी शारीरिक या मानसिक अक्षमता या मृत्यु या अन्य कारण से शिकायत दर्ज करने में असमर्थ है, वहां उसका कानूनी उत्तराधिकारी या ऐसा कोई अन्य व्यक्ति, जिसे विहित किया जाए, इस धारा के अंतर्गत शिकायत कर सकता है, लेकिन शिकायत के साथ पीड़ित की लिखित स्वीकृति भी होनी चाहिए।
4. सभी शिकायतें केवल लिखित रूप में ही स्वीकार की जाएंगी। समिति को लिखित शिकायत न होने पर भी कार्रवाई करने की अनुमति है। हालांकि लिखित शिकायत स्वीकार नहीं की जाती है।



- अवश्य , तथापि यदि पीड़ित ऐसा नहीं करना चाहता तो कोई भी व्यक्ति लिख सकता है उसकी ओर से.
5. किसी भी लिखित शिकायत पर शिकायतकर्ता के हस्ताक्षर होने चाहिए तथा उसे शिकायतकर्ता को पढ़कर सुनाया जाएगा तथा जब तक शिकायतकर्ता द्वारा हस्ताक्षर नहीं किए जाएंगे, तब तक उस पर कार्रवाई नहीं की जाएगी।
  6. शिकायतकर्ता को प्रत्येक स्तर पर पूर्ण गोपनीयता प्रदान की जाएगी।
  7. शिकायतकर्ता का नाम, पता, पहचान या कोई अन्य विवरण जिससे उसकी पहचान हो सके, गोपनीय रखा जाएगा तथा इस संबंध में बैठक बुलाए जाने तक समिति को भी इसका खुलासा नहीं किया जाएगा।
  8. इस तरह के संचार की तारीख से 5 कार्य दिवसों की अवधि के भीतर, अध्यक्ष शिकायत से निपटने के लिए एक बैठक बुलाएगा और शिकायत के तथ्यों को सत्यापित करने के लिए प्रारंभिक जांच/तथ्य खोज जांच करेगा। यदि शिकायत वास्तविक पाई जाती है तो एक **जांच समिति** गठित की जाएगी।
  9. यदि जांच समिति शिकायत पर आगे बढ़ने का फैसला करती है, तो उनके पास शिकायतकर्ता और शिकायतकर्ता के बीच मामले को सुलह के माध्यम से निपटाने का विकल्प हो सकता है। इसके लिए शिकायतकर्ता की इच्छा का पता लगाया जाएगा और यदि शिकायतकर्ता चाहता है कि चेतावनी पर्याप्त होगी तो कथित अपराधी को समिति की बैठक में बुलाया जाएगा, उसकी बात सुनी जाएगी और यदि वह संतुष्ट हो जाता है कि चेतावनी उचित और उचित है, तो उसे उसके व्यवहार के बारे में चेतावनी दी जा सकती है। इसके बाद मामले को समाप्त माना जाएगा और शिकायत रजिस्टर में इस आशय का एक नोट बनाकर निपटारा किया जाएगा।

## **XII. जांच समिति का गठन**

जांच समिति निम्नलिखित मानदंडों के साथ मुख्य समिति का एक हिस्सा होगी:

1. **जब शिकायतकर्ता कोई कर्मचारी हो:** अध्यक्ष (महिला सदस्य), एक आंतरिक सदस्य और एक बाह्य सदस्य के साथ दो कर्मचारी सदस्यों (एक पुरुष और एक महिला) की उपस्थिति अनिवार्य है।
2. **जब शिकायतकर्ता कोई अन्य आगंतुक हो :** एक स्टाफ सदस्य, अध्यक्ष (महिला सदस्य) और बाहरी सदस्य की उपस्थिति अनिवार्य है।

**\*\*\* सभी मामलों में कम से कम एक पुरुष सदस्य की उपस्थिति अनिवार्य है।**

## **XIII. पूछताछ प्रक्रिया**

यदि शिकायतकर्ता अनुरोध करता है कि शिकायत पर आगे कार्रवाई की जानी चाहिए

यदि कोई शिकायत मात्र चेतावनी के रूप में दी गई हो, तो उस पर कार्रवाई की जाएगी तथा उसे 90 कार्य दिवसों की निर्धारित अवधि के भीतर हल करना होगा।

1. जांच प्रक्रिया शुरू होने के पांच दिनों के भीतर, जांच समिति आरोपी और शिकायतकर्ता को शिकायत की एक प्रति उपलब्ध कराएगी, साथ ही एक लिखित नोटिस भी देगी जिसमें दोनों पक्षों को लिखित रूप से प्रस्तुत करने के लिए कहा जाएगा। यदि शिकायतकर्ता के पास पहले दर्ज की गई शिकायत में जोड़ने के लिए कुछ नहीं है, तो वह बस उस आशय का एक बयान प्रस्तुत कर सकती है।
2. एक सप्ताह के भीतर, दोनों पक्ष जांच समिति को उन दस्तावेजों पर अपने जवाब प्रस्तुत करेंगे जो उन्हें सौंपे गए हैं। जवाबों में उन सवालों की सूची भी शामिल हो सकती है जो पक्ष चाहता है कि जांच समिति दूसरे पक्ष या उसके गवाहों से पूछे।
3. उत्तरों और प्रश्नों की सूची प्राप्त होने के एक सप्ताह के भीतर, जांच समिति मौखिक सुनवाई की प्रक्रिया शुरू करेगी।
4. मौखिक सुनवाई के दौरान, शिकायतकर्ता, अभियुक्त और उनके गवाहों को शिकायत में उल्लिखित घटनाओं का विवरण देने का अलग-अलग अवसर दिया जाएगा।
5. मौखिक सुनवाई के समय सभी पक्षकार कोई भी दस्तावेजी साक्ष्य प्रस्तुत कर सकते हैं।
6. जांच समिति को मौखिक सुनवाई के दौरान सभी पक्षों से ऐसे प्रश्न पूछने का अधिकार होगा, जो वह उचित समझे।
7. जांच समिति शिकायतकर्ता और प्रतिवादी द्वारा अन्य पक्षों के लिए प्रस्तुत किए गए प्रश्न भी पूछेगी। हालाँकि, जांच समिति को ऐसे किसी भी प्रश्न को अस्वीकार करने का अधिकार है जिसके बारे में उसे विश्वास हो कि वह अप्रासंगिक, शरारती या लिंग के प्रति असंवेदनशील है।
8. जांच समिति अतिरिक्त गवाहों को भी बुला सकती है तथा उनसे कोई भी प्रश्न पूछ सकती है, जो वह उचित समझे।
9. जांच समिति के पास शिकायतकर्ता के साथ-साथ आरोपी से संबंधित किसी भी आधिकारिक कागजात या दस्तावेजों के लिए संबंधित अधिकारियों से पूछने की शक्ति होगी।
10. जांच समिति निष्पक्ष तरीके से कार्यवाही करेगी और शिकायतकर्ता और आरोपी को अपना मामला पेश करने और बचाव करने के लिए उचित अवसर प्रदान करेगी।
11. जांच कार्यवाही के दौरान किसी भी समय आरोपी और शिकायतकर्ता को आमने-सामने नहीं रखा जाएगा, या ऐसी स्थिति में नहीं रखा जाएगा जहां वे आमने-सामने हों।
12. जांच समिति इसके खिलाफ किसी भी पूर्व शिकायत को प्रासंगिक मान सकती है

आरोपी। हालाँकि, जांच प्रक्रिया में किसी भी समय शिकायतकर्ता के पिछले यौन इतिहास की जांच नहीं की जाएगी, क्योंकि ऐसी जानकारी यौन उत्पीड़न की शिकायत के लिए अप्रासंगिक मानी जाएगी।

13. यदि अभियुक्त, बिना किसी वैध आधार के, जांच समिति के अध्यक्ष द्वारा आयोजित तीन सुनवाईयों में उपस्थित होने में विफल रहता है, तो समिति को उपलब्ध साक्ष्य के आधार पर शिकायत पर निर्णय लेने का अधिकार होगा।
14. पूछताछ के दौरान वकीलों की अनुमति नहीं है, लेकिन दोनों पक्ष उनकी मदद ले सकते हैं।

### **टिप्पणी:**

*यौन उत्पीड़न के ज्यादातर मामले निजी तौर पर होते हैं, इसलिए हो सकता है कि कोई चश्मदीद गवाह न हो। जांच समिति को इस तरह के सबूत या साक्ष्य के बिना शिकायत के बारे में निष्कर्ष पर पहुंचना होगा। यह परिस्थितिजन्य साक्ष्य और शिकायतकर्ता, अभियुक्त और गवाहों (यदि कोई हो) की लिखित प्रस्तुतियों और मौखिक गवाही के साथ-साथ किसी भी दस्तावेजी साक्ष्य पर निर्भर करेगा। यह जांच कोई आपराधिक जांच या कानून की अदालत में कार्यवाही नहीं है - शिकायत पर निर्णय लेने के लिए 'उचित संदेह से परे सबूत' के बजाय एक मजबूत संभावना ही पर्याप्त है।*

### **XIV. शिकायत वापसी**

1. शिकायतकर्ता जांच प्रक्रिया के दौरान किसी भी समय लिखित रूप में अपनी शिकायत वापस ले सकता है। हालाँकि, समिति को शिकायत वापस लेने के कारणों का पता लगाना चाहिए और उसे लिखित रूप में दर्ज करना चाहिए तथा शिकायतकर्ता से उस पर प्रतिहस्ताक्षर करवाना चाहिए।
2. ऐसी वापसी पर शिकायत जांच प्रक्रिया समाप्त कर दी जाएगी, उन मामलों को छोड़कर जिनमें जांच समिति को सूचित किया गया है, पता है, या विश्वास करने का कारण है, कि ऐसी वापसी के कारण जबरदस्ती और धमकी के परिणाम या प्रभाव हैं अभियुक्त, या शिकायतकर्ता की ओर से कोई भी व्यक्ति। ऐसे मामले में, शिकायत जांच कार्यवाही नीति में उल्लिखित प्रक्रिया के अनुसार जारी रहेगी।

### **XV. अनुशासनात्मक कार्यवाही**

समिति द्वारा अनुशासनात्मक कार्रवाई में वृद्धि, शिकायतकर्ता को हुई चोट की प्रकृति और सीमा, समग्र रूप से संस्थानों पर उल्लंघन का प्रभाव, सत्ता पदानुक्रम में उत्पीड़क की स्थिति, पुनरावृत्ति जैसे कारकों पर निर्भर हो सकती है। अपराध आदि

जहां समिति को पता चलता है कि कंपनी का कोई कर्मचारी शिकायतकर्ता के यौन उत्पीड़न में संलिप्त है, तो वह निम्नलिखित रूप में अनुशासनात्मक कार्रवाई की सिफारिश कर सकती है:

1. चेतावनी
2. लिखित माफ़ी
3. व्यवहार का बंधन
4. प्रदर्शन मूल्यांकन में प्रतिकूल टिप्पणियाँ
5. कर्तव्यों से वंचित करना
6. पुनः नियुक्ति या अनुबंध के नवीकरण से इनकार
7. वेतन वृद्धि/पदोन्नति रोकना
8. पदावनत, पदावनत
9. निलंबन
10. पदच्युति
11. कोई अन्य प्रासंगिक तंत्र

ऐसे मामलों में जहां समिति किसी तीसरे पक्ष/बाहरी व्यक्ति को यौन उत्पीड़न का दोषी पाती है, कंपनी के प्राधिकारी उचित प्राधिकारी के पास शिकायत दर्ज कराकर कार्रवाई शुरू करेंगे और कंपनी स्तर पर वे निम्नलिखित रूप में अनुशासनात्मक कार्रवाई की सिफारिश कर सकते हैं:

12. चेतावनी
13. लिखित माफ़ी
14. परिसर में प्रवेश पर रोक

***या समिति पर किसी भी तरह का दबाव/धमकी देने वाले व्यक्ति के खिलाफ कार्रवाई की जाएगी।***

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उपर्युक्त रिपोर्टों में शिकायतकर्ताओं की गोपनीयता बनाए रखी जाएगी।

## **XVI. निवारण**

1. समिति कंपनी के मुख्य कार्यकारी अधिकारियों को अनुशासित अनुशासनात्मक कार्रवाई के साथ एक रिपोर्ट प्रस्तुत करेगी।
2. जांच रिपोर्ट प्राप्त होने पर **वीडीओआईटी टेक्नोलॉजीज लिमिटेड** के सीईओ दो महीने के भीतर प्रासंगिक सेवा नियमों के तहत समिति की सिफारिशों के आधार पर अनुशासनात्मक कार्रवाई लागू करेंगे।
3. अनुशासनात्मक कार्रवाई उल्लंघन की प्रकृति के अनुरूप होगी।
4. यदि शिकायत साबित नहीं होती है, तो समिति सिफारिश करेगी कि मामले में कोई कार्रवाई करने की आवश्यकता नहीं है। किसी शिकायत को प्रमाणित करने में असमर्थता या

- पर्याप्त सबूत दें कि आपको शिकायतकर्ता के खिलाफ कार्रवाई करने की आवश्यकता नहीं है।
5. ऐसे मामलों में, जो दुर्लभ होने की संभावना है, जहां समिति इस निष्कर्ष पर पहुंचती है कि शिकायतकर्ता द्वारा लगाया गया आरोप दुर्भावनापूर्ण है या शिकायतकर्ता की पूर्ण जानकारी में झूठा है या जहां शिकायतकर्ता ने कोई जाली या भ्रामक दस्तावेज प्रस्तुत किया है, समिति ऐसे शिकायतकर्ता के विरुद्ध दंडात्मक कार्रवाई की सिफारिश कर सकती है।
  6. यदि समिति इस निष्कर्ष पर पहुंचती है कि जांच के दौरान किसी गवाह ने गलत साक्ष्य दिया है या कोई जाली या भ्रामक दस्तावेज प्रस्तुत किया है, तो वह उक्त गवाह के खिलाफ दंडात्मक कार्रवाई की सिफारिश कर सकती है।
  7. निवारण और समाधान के गैर-प्रतिकूल तरीकों पर भी विचार किया जा सकता है। इसके उदाहरण मौखिक चेतावनी, मौखिक माफ़ी, अच्छे व्यवहार का वादा आदि हो सकते हैं।
  8. समिति, अपवादात्मक मामलों में, कंपनी से शिकायतकर्ता को 10 दिनों तक की अवधि के लिए अवकाश पर जाने की अनुमति देने के लिए कह सकती है (यह अवकाश उसके अवकाश खाते से नहीं काटा जाएगा)।
  9. शिकायतकर्ता को ऐसी अन्य राहत प्रदान करना जो विहित की जा सके।

## **XVII. वीडिओआईटी टेक्नोलॉजीज लिमिटेड के अधिकारियों के दायित्व**

1. कार्यस्थल पर सुरक्षित कार्य वातावरण उपलब्ध कराना जिसमें कार्यस्थल पर संपर्क में आने वाले व्यक्तियों से सुरक्षा शामिल होगी।
2. कार्यस्थल पर किसी भी प्रमुख स्थान पर यौन उत्पीड़न के दंडात्मक परिणाम तथा **वीडीओआईटी टेक्नोलॉजीज लिमिटेड के गठन का आदेश प्रदर्शित करना।**
3. कर्मचारियों को अधिनियम के प्रावधानों के प्रति संवेदनशील बनाने के लिए प्रतिवर्ष दो या अधिक कार्यशालाओं का आयोजन करने तथा समिति के सदस्यों के लिए अभिमुखीकरण कार्यक्रम आयोजित करने में समिति की सहायता करना।
4. प्रत्येक कैलेंडर वर्ष की शुरुआत में लिंग अभिविन्यास सत्र आयोजित करना चाहिए।
5. कंपनी अपने अधिकारियों के माध्यम से समिति को आवश्यक सुविधाएं और जांच की प्रक्रिया सुनिश्चित करेगी। साथ ही, वह समिति को शिकायत के संबंध में आवश्यक जानकारी भी उपलब्ध कराएगी।
6. आईपीसी के तहत शिकायत दर्ज करने के लिए व्यक्ति को सहायता प्रदान करना
7. यौन उत्पीड़न को सेवा नियम के अंतर्गत कदाचार माना जाएगा तथा कदाचार के विरुद्ध कार्रवाई शुरू की जाएगी।
8. यौन उत्पीड़न की शिकायतों के लिए आरटीआई लागू नहीं है।

## **XVIII. नीति में संशोधन**

1. वर्तमान कानूनों में संशोधन के अनुसार नीति में उचित संशोधन किया जाएगा।
2. आवश्यकता पड़ने पर समिति समय-समय पर नीति में संशोधन कर सकती है।

**POLICY DOCUMENT OF**

**INTERNAL COMPLAINT COMMITTEE TO PREVENT  
SEXUAL HARASSMENT AT THE WORKPLACE**

**A GENDER-NEUTRAL POLICY**

**AN ATTEMPT TO CREATE A SAFE AND SECURE WORKPLACE ENVIRONMENT FOR ALL  
EMPLOYEES**

**GUIDELINES FOR (VDOIT TECHNOLOGIES LIMITED)**

# **POLICY AGAINST SEXUAL HARASSMENT AT THE WORKPLACE**

## **I. Preamble**

The Parliament of India passed the “Sexual Harassment of Women at Workplace (Prevention, Prohibition, and Redressal) Act,” in the year 2013. The ACT provides protection against sexual harassment of women at workplace and for the prevention and redressal of complaints of sexual harassment and for the matters connected therewith or incidental thereto.

The guidelines explicitly state the following:

*“It shall be the duty of the employer or other responsible persons in workplaces or other institutions to prevent or deter the commission of acts of sexual harassment and to provide the procedures for the resolutions, settlement, or prosecution of acts, of sexual harassment by taking all steps require.”*

Public Limited Companies are also bound by the Supreme Court’s directive and the Act. VDOIT Technologies Limited is committed to creating and maintaining an environment which is free of all forms of gender violence, sexual harassment, and discrimination on the basis of sex/gender. Following this, the Company is committed to uphold the Constitutional mandate ensuring the above-mentioned human rights of all those who fall within its jurisdiction. As directed by the act VDOIT Technologies Limited has constituted a committee called “Internal Complaint Committee to Prevent Sexual Harassment of Women at the Workplace.” The following policy has been made keeping in mind the above facts.

## **II. Objectives**

The objectives of the Internal Complaint Committee to Prevent Sexual Harassment at the Workplace are as follows:

- To develop a policy against sexual harassment at the Company.
- To evolve a permanent mechanism for the prevention and redressal of sexual harassment cases and other acts of gender-based violence at the Company.
- To ensure the implementation of the policy in letter and spirit through proper reporting of the complaints and their follow-up procedures.
- To uphold the commitment of the Company to provide an environment free of gender-based discrimination.



- To create a secure physical and social environment to deter any act of sexual harassment.
- To promote a social and psychological environment to raise awareness on sexual harassment in its various forms.

### **III. The Definition of Sexual Harassment (as per the act)**

According to THE SEXUAL HARASSMENT OF WOMEN AT THE WORKPLACE (PREVENTION, PROHIBITION AND REDRESSAL) ACT 2013, sexual harassment includes any one or more of the following unwelcome acts or behavior (whether directly or by implication) namely:

1. Physical contact and advances; or
2. A demand or request for sexual favors; or
3. Making sexually colored remarks; or
4. Showing pornography; or
5. Any other unwelcome physical, verbal or non-verbal conduct of sexual nature.

Any act falling under the purview of following cases will be considered as an incident of sexual harassment (Clarification of Unwelcome acts or behavior):

- a) When submission to unwelcome sexual advances, requests for sexual favours, and verbal or physical conduct of a sexual nature are, implicitly or explicitly, made a term or condition of guidance, employment, participation, or evaluation of a person's engagement in any activity.
- b) When unwelcome sexual advances, and verbal, non-verbal and/or physical conduct such as loaded comments, remarks or jokes, letters, phone calls or e-mails, gestures, exhibition of pornography, lurid stares, physical contact, stalking, sounds or display of a derogatory nature.
- c) Interfering with her work or creating an intimidating, offensive, or hostile environment for her.
- d) When a person uses the body or any part of it or any object as an extension of the body with a sexual purpose in relation to another person without the latter's consent or against that person's will, such conduct will amount to sexual assault.
- e) When deprecatory comments, conduct or any such behavior is based on the gender identity/sexual orientation of the person and/or when the premises or any public

forum of the Company is used to denigrate/discriminate against person(s), or create a hostile environment on the basis of a person's gender identity/sexual orientation.

- f) When a person shows any humiliating treatment to a woman that is likely to affect her health and safety.

#### **IV. Jurisdiction**

The policy and the rules & regulations would apply to all employees on active roles of **VDOIT Technologies Limited**. The policy and the rules & regulations would also apply to outsiders who may be within the territory of the **VDOIT Technologies Limited** at time of commission of the act coming under the purview of the policy.

1. The policy would apply inside the Company Premises but also outside premises on occasion of official duty (workshops, field work, excursions organized by **VDOIT Technologies Limited**, interviews/meeting with outside people and any other activity organized by **VDOIT Technologies Limited** outside the premises including the period of travelling for such activity).
2. In particular, the rules and procedures laid down in this policy shall be applicable to all complaints of sexual harassment made:
  - I. By an employee against an employee of the Company irrespective of whether sexual harassment is alleged to have taken place within or outside the premises.
  - II. By an outsider against an employee or an employee against an outsider, if the sexual harassment is alleged to have taken place within the premises.

In the above, the following definitions will apply:

Members of the **VDOIT Technologies Limited** include employees (permanent and temporary) and any other visitors.

- a. Employee refers to any person in the Company who is in employment of the Company including trainee, intern & apprentices.
  - b. Any other visitor refers to any person visiting Company for any purpose; or appearing/participating in interview/entrance tests/seminars/workshops/conferences.
3. Premises refers to all places of work within the Company territory.
  4. In order to implement the policy, a Committee shall be appointed whose composition and mandate would be as described below.

## **V. Constitution of the Internal Committee**

The Committee shall consist of following five members, who shall be appointed by the Director as under, namely:

1. A senior female staff member from the Company, as the Chairperson & Presiding Officer
2. Two members all in employment of Company (One females and one male)
3. One External male member (preferably familiar & knowledge with issues related to sexual harassment)
4. The term of each member shall be of three years. The previous committee members will continue till the new committee is constituted at the end of three years' term.
5. The previous committee members are eligible for reappointment if the director is satisfied with their working.

## **VI. Disqualification**

No person shall be appointed or continue to be a member of the Committee, if he/she is

1. Declared insolvent by the competent Court;
2. Lunatic or a person of unsound mind;
3. Convicted for an offence involving moral turpitude;
4. Involved in a misconduct amounting to immoral trafficking;
5. Convicted in any criminal offence/s;
6. Facing any inquiry relating to sexual harassment or found guilty of sexual harassment; punished for any misbehavior or misconduct.

## **VII. Statutory Status**

The Internal Committee to Prevent Sexual Harassment of Women at the Workplace is empowered to carry out the mandate of the policy and has statutory power as are vested in a civil court under the Code of Civil Procedure, 1908 when trying a suit in respect of the following matters:

1. Summoning and enforcing the attendance of any person (COMPLAINANT /COMPLAINEE /WITNESS) and examining him/her on OATH and recording the statements
2. Requiring the discovery and production of valid Documents
3. Any other matter which may be prescribed

## **VIII. Power and Duties of the Committee:**

The committee is NOT to act as moral police; neither will it intrude on anyone's privacy. The role of the Committee is to create awareness about sexual harassment and to deal with and recommend punishment for non-consensual acts of sexual harassment, and not to curtail sexual expression within the premises. Members are expected to be sensitive to the issue and not let personal biases and prejudices (whether based on gender, caste, class) and stereotypes (e.g., predetermined notions of how a "victim" or "accused" should dress up or behave) affect their functioning as members of the committee.

### **A. Preventive**

1. To create and ensure a safe environment that is free of sexual harassment, including safety from persons/visitors coming into contact at the workplace.
2. To publicize the policy in English widely, especially through notice boards and distribution of pamphlets
3. To publicize in English, the names and phone numbers of members of the Committee.

### **B. Gender Sensitization**

Gender Sensitization involves creating awareness about issues of gender and sexuality and working towards and creating an enabling environment of gender justice where all can work together with a sense of personal security and dignity. Sensitization and Awareness will be a basic function of the Committee formed. The following is a list of methods in which awareness and sensitization employees will be conducted:

1. An orientation seminar will be organized to discuss the nature and scope of the

sexual harassment of women at the workplace (Prevention, Prohibition and Redressal) Act 2013, at the beginning of the calendar year.

2. One or more workshops/seminars annually where external experts on the subject will interact with all employees.
3. Seminars, performances and discussion forums where gender sensitization and gender awareness will be the focus – these will happen during the calendar year.
4. Spreading awareness of the policy and implementation of the same through informal sessions, performances etc., about the policy being implemented by (Company Name).

### **C. Remedial**

1. The mechanism for registering complaints should be safe, accessible, and sensitive.
2. To take cognizance of complaints about sexual harassment, conduct enquiries, provide assistance and redressal to the victims, recommend punitive action or take immediate action against the harasser, if necessary.
3. To recommend disciplinary action for any complaint registered with the Committee after the enquiry to the Director/administration/or concerned authorities and to follow- up action and monitor the same.
4. To recommend Company to provide assistance to the complainant if she so chooses to file a complaint in relation to the offence under the Indian Penal Code or any other law for the time-being in force.
5. To recommend the Company to provide the medical intervention with the consent of the complainant or even without consent in such cases where the complainant is physically or mentally incapacitated to give her consent.
6. To inform the administration to arrange for appropriate psychological, emotional, and physical support (in the form of counselling, security and other assistance) to the victim if she so desires.

### **IX. Meetings of the Committee:**

The members of the Committee shall meet at least four times in a year. The Chairperson & presiding officer shall preside over the meeting. In the absence of the Chairperson, the second senior female member shall preside over the meeting. The Chairperson may upon the request of not less than one third of the total members of the Committee, call a meeting on a date not later than fifteen days after the receipt of such requisition.

1. The quorum of the meeting of the Committee shall have four of its members. If the quorum is not complete in any meeting, it shall be adjourned for half an hour and thereafter, the meeting shall precede with those members who are present in the meeting.
2. All decisions in the meeting will be taken through mutual consent from the members of the Committee present in the meeting. In the case of any disagreement among the members regarding any decision, the Chairperson of the Committee shall hold the authority to take the final decision and her decision would be considered as final.

#### **X. Allowances**

The travelling allowances should be paid to the External members of the Committee for attending all the meetings of the Committee or any invited guest coming for the work of the Committee.

Any internal member of the Committee, who is on official duty or personal leave (outside Gurgaon) is called for meeting, the travelling allowances should be paid to such members of the Committee.

#### **XI. Complaint Procedure**

1. Any woman / employee or probationer or even a student (hereinafter mentioned as the 'COMPLAINANT') shall have the right to file a complaint concerning any harassment including sexual harassment against any employee/Faculty /Administrative staff / research staff / any of the members of the Committee (hereinafter mentioned as the 'COMPLAINEE') as the case may be.
2. Any COMPLAINANT may file a complaint within a period of 3 months from the date of incident. In case of a series of incidents, a COMPLAINANT should file a case within a period of 3 months from the date of last incident.
3. Where the aggrieved employee is unable to file a complaint on account of his/her physical or mental incapacity or death or otherwise, his/her legal heir or such other person as may be prescribed may make a complaint under this section but complaint should be accompanied with a written approval of the victim..
4. All complaints will only be accepted in writing. The Committee is allowed to take action even in the absence of a written complaint. Though a written complaint is

must, however if the victim does not want to do the same, anybody can write on his/her behalf.

5. Any complaint in writing has to be signed by the COMPLAINANT and will be read out to the complainant and will not be acted upon till the same is signed by the complainant.
6. The complainant shall be afforded full secrecy at each stage.
7. The name, address, identity or any other particulars calculated to lead to identification of the COMPLAINANT shall be kept confidential and will not be disclosed even to the Committee, till the meeting in this regard is convened.
8. Within a period of 5 working days from the date of such communication, the Chairperson shall convene a meeting to deal with the complaint and make preliminary enquiry/fact finding enquiry to verify the facts of the complaint. An **Enquiry Committee** will be constituted if the complaint is found genuine.
9. In case, the Enquiry Committee decides to proceed with the complaint, they may have the option to settle the matter between COMPLAINANT & COMPLAINEE through conciliation. For this the wishes of the complainant shall be ascertained and if the complainant wishes that a warning would suffice then the alleged offender shall be called to the meeting of the Committee, heard and if so satisfied that a warning is just and proper, he may be warned about his behavior. The matter shall then be treated as concluded and disposed of with a note to that effect made in the Complaint Register.

## **XII. Constitution of the Enquiry Committee**

The Enquiry Committee will be a part of the main Committee with the following criteria -

1. **When the COMPLAINANT is a Staff:** Presence of two staff members (one male and one female) is mandatory along with Chairperson (female member), one Internal Member, and the External Member.
2. **When the COMPLAINANT is any other Visitor:** Presence of one Staff member, Chairperson (female member) and the External Member is mandatory.

**\*\*\* In all cases the presence of at least one Male member is compulsory.**

## **XIII. The Inquiry Process**

In case the **COMPLAINANT** requests that the complaint should be processed with beyond

a mere warning, the same may be processed and has to be solved within a stipulated time of 90 working days.

1. Within five days of the start of the enquiry process, the Inquiry Committee shall furnish a copy of the complaint to the accused and complainant along with a written notice requiring both parties to furnish a written submission. In case the complainant does not have any additions to make to the complaint filed earlier, she can just submit a statement to that effect.
2. Within a week, both parties shall submit to the Inquiry Committee their replies to the documents that have been served on them. The replies may also include a list of questions that the party wishes the Enquiry Committee to ask the other party or its witnesses.
3. Within one week of the receipt of the replies and list of questions in (2) above, The Enquiry Committee shall start the process of an oral hearing.
4. In the course of the oral hearing, the complainant, the accused, and their witnesses will separately be given a chance to give an account of the instances alluded to in the complaint.
5. All parties can also submit any documentary evidence at the time of the oral hearing.
6. The Enquiry Committee shall have the power to ask questions that it deems fit to all parties during the oral hearing.
7. The Enquiry Committee would also ask questions which have been submitted by the complainant and defendant for the other parties. However, The Enquiry Committee has the right to disallow any questions that it has reason to believe to be irrelevant, mischievous, or gender insensitive.
8. The Enquiry Committee may also call upon additional witnesses and ask them any questions that it may deem fit.
9. The Enquiry Committee shall have the power to ask the relevant authorities for any official papers or documents pertaining to the complainant as well as the accused.
10. The Enquiry Committee shall conduct the proceedings in a fair manner and shall provide reasonable opportunity to the complainant and accused for presenting and defending his/her case.
11. At no time during the inquiry proceedings shall the accused and the complainant be placed face to face, or put in a situation where they may be face to face.
12. The Enquiry Committee may consider as relevant any earlier complaints against the



accused. However, at no time in the enquiry process shall the past sexual history of the complainant be probed into, as such information shall be deemed irrelevant to a complaint of sexual harassment.

13. If the accused fails, without valid ground, to present him for three hearings convened by the chairperson of the Enquiry Committee shall have the right to take a decision on the complaint based upon available evidence.
14. Lawyers are not allowed during the enquiry but both sides can avail help from them.

**Note:**

*Most cases of sexual harassment occur in private, so there may not be any eye-witness. The Enquiry Committee will have to come to a conclusion about the complaint without proof or evidence of this kind. It will rely on circumstantial evidence and the written submissions and oral testimonies of the complainant, the accused, and witnesses if any as well as any documentary evidence. This inquiry is not a criminal investigation or a proceeding in a court of law – a strong probability, rather than ‘proof beyond reasonable doubt’, is enough to make a decision on the complaint.*

**XIV. Complaint Withdrawal**

1. The COMPLAINANT may withdraw his/her complaint in writing at any time during the inquiry procedure. However, the Committee must ascertain the reasons for withdrawal of the complaint and record the same in writing and get it counter- signed by the complainant.
2. The complaints enquiry procedure shall, on such withdrawal, be terminated, save in instances in which the Enquiry Committee is informed, knows, or has reason to believe, that the reasons for such withdrawal are the consequences or effect of coercion and intimidation exerted by the Accused(s), or any person on her/his behalf on the complainant. In such an instance, the complaints enquiry proceedings shall continue in accordance with the procedure outlined in the policy.

**XV. Disciplinary Actions**

Enhancement of disciplinary action, by the Committee, could depend on factors such as the nature and extent of injury caused to the complainant, the impact of the violation on the institutions as a whole, the position of the harasser in the power hierarchy, repetition of offence etc.

Where the Committee finds an employee of the Company involved in sexual harassment of the complainant, it can recommend disciplinary action in the form of:

1. Warning
2. Written apology
3. Bond of good behaviour
4. Adverse remarks in the performance assessment
5. Debarring from duties
6. Denial of re-employment or renewal of contract
7. Stopping of increments/promotion
8. Reverting, demotion
9. Suspension
10. Dismissal
11. Any other relevant mechanism

In such cases where the Committee finds a third party/outsider to be guilty of sexual harassment, the Company's authorities shall initiate action by making a complaint with the appropriate authority and at the Company level it can recommend disciplinary action in the form of:

12. Warning
13. Written apology
14. Debarring entry into the premises

*[NOTE: The reasons for the action have to be provided in writing. Action will be taken against the person(s) who try to pressurize the complainant in any way and any pressure/threat to the committee.]*

In the above-mentioned reports, confidentiality of the complainants will be maintained.

## **XVI. Redressal**

1. The Committee will submit a report along with recommended disciplinary actions to the CEOs of the Company.
2. The CEOs of the **VDOIT Technologies Limited** upon receipt of the enquiry report shall implement the disciplinary action on the basis of the recommendations of the Committee under relevant service rules within two months.
3. The disciplinary action will be commensurate with the nature of the violation.
4. In case the complaint is not proved, the Committee shall recommend that no action is required to be taken in the matter. Mere inability to substantiate a complaint or

provide adequate proof that you need not attract action against the complainant.

5. In such cases that are likely to be rare, where the Committee arrives at the conclusion that the allegation by the complainant is malicious or false with the full knowledge of the complainant or where the complainant has produced any forged or misleading document, the Committee may recommend punitive action against such COMPLAINANT.
6. If the Committee arrives at a conclusion that during the inquiry any witness has given false evidence or produced any forged or misleading document, it may recommend punitive action against the said witness,
7. Non-adversarial modes of redressal and resolution could also be considered in appropriate cases. Examples of this may be verbal warning, verbal apology, promise of good behavior etc.
8. The Committee, in exceptional cases, can ask the Company to allow the complainant to proceed on leave for a period of up to 10 days (the leave will not be deducted from her leave account).
9. Grant such other relief to the complainant as may be prescribed.

#### **XVII. Obligations of VDOIT Technologies Limited Authorities**

1. Provide a safe working environment at the workplace which shall include safety from persons coming into contact at the workplace.
2. Display at any conspicuous place at the workplace, the penal consequences of sexual harassment, and the order constituting the **VDOIT Technologies Limited**
3. Assist the Committee to organize two or more workshops annually to sensitize the employees with the provisions of the Act and orientation programmed for members of the Committee
4. Company should organize gender orientation sessions at the beginning of each calendar year.
5. The Company through its authorities would ensure necessary facilities to the Committee and the process of an inquiry. It would also make available such information to the Committee as it may require having regard to the complaint.
6. Provide assistance to the individual to file a complaint under the IPC
7. Treat sexual harassment as misconduct under the service rule and initiate action against misconduct.
8. RTIs are not applicable for sexual harassment complaints.

### **XVIII. Amendments in the Policy**

1. The policy will be suitably amended as per modifications in the prevailing laws.
2. In case of need, committee may amend the policy time to time.

क्रमांक	आईसी के सदस्य का विवरण	नाम	आधिकारिक पदनाम	संपर्क विवरण एवं ईमेल आईडी	टिप्पणी
1	अध्यक्ष (महिला)	नीतू गुप्ता	पूर्णकालिक निदेशक	8800552860& Neetu.Gupta@vdoit.in	----- -
2	सदस्य	विनीता बंसल	मुख्य वित्तीय अधिकारी	99711 66901& Vinita.Bansal@vdoit.in	----- -
3	सदस्य	अभिनव अग्रवाल	वरिष्ठ प्रबंधक संचालन	9810723276& अभिनव.अग्रवाल@vdoit.in	-----
4	सदस्य	शिल्पा	कंपनी सचिव	9718412072 एवं शिल्पा.vdoit@gmail.com	
5	सदस्य (एनजीओ)	एडवोकेट शिखा कटारिया	बाहरी सदस्य	9310541827 advshikakataria@gmail.com	

Sr. no	Details of member of IC	Name	Official Designation	Contact detail & email-id	Remarks
1	Chairperson (F)	Neetu Gupta	Whole Time Director	8800552860 & Neetu.Gupta@vdoit.in	----- --
2	Member	Vinita Bansal	Chief Financial Officer	99711 66901 & Vinita.Bansal@vdoit.in	----- --
3	Member	Abhinav Agrawal	Sr. Manager operations	9810723276 & Abhinav.agrawal@vdoit.in	----- --
4	Member	Shilpa	Company secretary	9718412072 & Shilpa.vdoit@gmail.com	
5	Member (NGO)	Adv Shikha Kataria	External Member	9310541827 advshikhakataria@gmail.com	



The screenshot shows a Microsoft PowerPoint presentation titled "Impact of inappropriate behaviour". The slide content is as follows:

Professional	Personal
<ul style="list-style-type: none"><li>• Decreased work performance</li><li>• Increased absenteeism, late arrival</li><li>• Loss of professional opportunities</li><li>• Negative team dynamics, or colleagues' thoughts of the respondent</li><li>• Reduced longevity and quality of work</li><li>• Being ostracised</li><li>• Damaging public reputation</li><li>• Intimidation</li><li>• Being embarrassed</li><li>• Loss of confidence and self-esteem</li><li>• Reduced career progression</li><li>• Reduced respect and status</li></ul>	<ul style="list-style-type: none"><li>• Depression</li><li>• Anxiety, panic attacks</li><li>• Traumatic stress</li><li>• Insomnia</li><li>• Stress, guilt, self-blame</li><li>• Difficulties in communicating</li><li>• Resentment</li><li>• Fatigue, loss of motivation</li><li>• Personal difficulties with sleep</li><li>• Feeling ostracised, excluded or gossiped</li><li>• Feeling belittled and demeaned</li><li>• Feeling angry or bitter towards the respondent</li><li>• Feeling powerless</li><li>• Loss of confidence and self-esteem</li><li>• Over all use of sick or pseudo</li><li>• Reduced self-worth</li><li>• Withdrawal from activities</li></ul>

A Zoom meeting grid with the following participants:

- Abhinav Agrawal (Avatar: A)
- Manoj Negpal (Avatar: M)
- Devesh Gaur (Avatar: D)
- Sidharth Gupta (Avatar: S)
- Shriya Panghal (Avatar: S)
- 14 others (Avatar: N)
- H (Avatar: H)



tuilka mahapatra is presenting

The screenshot displays a Zoom meeting in progress. The main window shows a Microsoft PowerPoint presentation titled "POSH TRAINING" with a slide containing six images of people in professional settings. The participant list on the right includes Shilpa Panghal, Divyesh Gaur, Sidharth Gupta, and Kapil Dev Sharma. The Zoom control bar at the bottom shows a play/pause button highlighted, indicating the presentation is paused. The text "POSH Training" is visible in the bottom left corner of the Zoom interface.

**Instances of Sexual Harassment...in basic terms**

A number of unwelcome actions by fellow colleagues are causing harassment among women workers. Prominent of them are:

- Derogatory comments of sexual nature or based on gender;
- Presence of sexual visual material or pornographic material such as posters, cartoons, drawings, calendars, pinups, pictures, computer programs of sexual nature;
- Written material that is sexual in nature, such as notes or e-mail containing sexual comments;
- Comments about clothing, personal behavior, or a person's body;
- Patting, stroking grabbing or pinching one's body;
- Obscene phone calls;
- Telling lies or spreading rumors about a person's personal or sex life;
- Rape or attempted rape and so on.

Participant grid showing:

- Maraavi Nagpal
- Abhinav Agrawal
- Kapil Dev Sharma
- Sidharth Gupta
- Dr. Yadvinder Singh
- 25 others
- You

## Instances of Sexual Harassment...in basic terms

- ▶ A number of unwelcome actions by fellow colleagues are causing harassment among women workers. Prominent of them are:
- Derogatory comments of sexual nature or based on gender;
  - Presence of sexual visual material or pornographic material such as posters, cartoons, drawings, calendars, pinups, pictures, computer programs of sexual nature;
  - Written material that is sexual in nature, such as notes or e-mail containing sexual comments;
  - Comments about clothing, personal behavior, or a person's body;
  - Patting, stroking grabbing or pinching one's body;
  - Obscene phone calls;
  - Telling lies or spreading rumors about a person's personal or sex life;
  - Rape or attempted rape and so on.

prabhav



5:20 PM | kct-ecce-emp



21°C Simla 10:14 22/04/21

DELL

## RESPONSIBILITIES OF THE Employer



- Create and communicate a detailed policy;
- Ensure awareness and orientation on the issue;
- Constitute Complaints Committee's at workplace so that every working women is provided with a mechanism for redress of her complaint(s);
- Ensure Complaints Committees are trained in both skill and capacity;
- Prepare an annual report and report to the respective state government;
- District Officer will also appoint a nodal officer to receive complaints at the local level;
- Formulate and widely disseminate an internal policy or charter or resolution or declaration for prohibition, prevention and redressal of sexual harassment at the workplace intended to promote gender sensitive safe spaces and remove underlying factors that contribute towards a hostile work environment against women;
- Carry out orientation programmes and support for the Members of the Internal Committee;
- Carry out employees awareness programmes and create forum for dialogues which may involve Panchayat Raj, Yashodara, Gram Sahas, women's groups, mother committees, adolescent groups, urban local bodies and any other body as may be considered necessary.

5:21 PM | ind-women-emp



DELL





**CERTIFIED TRUE COPY OF THE RESOLUTION PASSED IN THE MEETING OF THE BOARD OF DIRECTORS OF VDOIT TECHNOLOGIES LIMITED HELD ON THURSDAY 8<sup>th</sup> JUNE, 2023 AT THE REGISTERED OFFICE OF THE COMPANY SITUATED AT 912, EMAAR PALM SQUARE, SECTOR - 66 GURUGRAM, HARYANA – 122011.**

**To Constitution of POSH Committee and Appointment of External Member in POSH Committee**

**RESOLVED THAT** as per the provisions of Section 4 of Sexual Harassment of Women at Workplace Prevention, Prohibition and Redressal Act, 2013, we hereby constitute the Internal Committee for our organization.

Updated list of POSH Committee given below:

S. No.	Name	Designation
1.	Ms. Neetu Gupta	Presiding Officer
2.	Ms. Vinita Bansal	Committee Member
3.	Ms. Abhinav Agrawal	Committee Member
4.	Ms. Shilpa	Committee Member
5.	Adv. Shikha Kataria	External Member

**RESOLVED FURTHER THAT** the Internal Committee members are hereby authorized to do the following:


- To draft the Sexual Harassment Policy for our organization
- To work towards providing a safe and respectful working environment
- Organize training and awareness programs (classroom / eLearning) at regular intervals
- To conduct meetings:
  - When there is a complaint received in writing from any of the women employees,
  - To settle grievances and
  - To make sure there is appropriate compensation for any case of misconduct and sexual harassment

**RESOLVED FURTHER THAT** Narinder Kumar Kamra, Managing Director is hereby authorized to do the following:

- Submission of application and other relevant documents to the concerned authorities / departments
- Declaration filing as required
- Authentication of documents related to the POSH Act
- Representation of the Company in connection to the issues related to the POSH Act
- Returns Filing as per the POSH Act

**"RESOLVED FURTHER THAT** Narinder Kumar Kamra, Managing Director of the company, be and is hereby authorized to issue the work order and to sign the resolution and do the needful to give effect to this resolution."

//Certified True Copy//  
For, VDOIT Technologies Limited

  
**Narinder Kumar Kamra**  
Managing Director  
DIN: 07102531  
Date: April 29, 2024

GURUGRAM, INDIA

vdoitech.com

महिलाओं का कार्यस्थल पर यौन उत्पीड़न (निवारण, प्रतिषेध और प्रतितोष) अधिनियम, 2013 के अन्तर्गत जिला स्तर पर गठित स्थानीय समिति, गुरुग्राम,  
ईमेल- आइडी **posh-grg.rev@hry.gov.in**

**Local Committee, Gurugram**  
Constituted under Sexual Harassment of Women at Workplace  
(Prevention, Prohibition and Redressal) Act, 2013  
Email-ID **posh-grg.rev@hry.gov.in**

Sr. No.	Name of Members of Local Committee	Designation	Mobile No.
1	Smt. Jyoti Grover	Chairperson	9810071537
2	District Programme Officer, Women & Child Development Department, Gurugram	Member (Ex-officio)	0124-2331148
3	Smt. Meghna Ghai	Member	9717850867
4	Smt. Geeta Khatri	Member	9871499786
5	Sh. Jayant Bakshi	Member	9873040148

**Important information for complaints such as** - the complainant is not required to go to a Advocate/lawyer, can directly approach office of the Additional Deputy Commissioner, Gurugram, Room number 3, Ground Floor, Vikas Sadan by email ID [posh-grg.rev@hry.gov.in](mailto:posh-grg.rev@hry.gov.in) etc.



# VDOIT TECHNOLOGIES LIMITED (FORMERLY Vdoit Technologies Private Limited)

REG. Office: 912, EMAAR PALM SQUARE, SEC.66, GURUGRAM, HARYANA, 122011

CIN: U72200HR2015PLC054827

## DIRECTOR'S REPORT

To,  
The Shareholders,

Your directors have pleasure in presenting their Annual Report of the Company together with the Audited Financial Accounts for the Year ended March 31, 2023.

### FINANCIAL SUMMARY/ HIGHLIGHTS

The Board hereby confirms that the Financial Statements of the company is disclosing true and fair view of the state of affairs of the Company:

Particulars	Standalone 2022-2023	Standalone 2021-2022	Consolidated 2022-2023	Consolidated 2021-2022
Revenue from Operations	4,79,22,873	3,21,80,657	4,79,22,873	-
Other Income	7,92,303	1,50,265	7,92,303	-
<b>Total Income</b>	<b>4,87,15,177</b>	<b>3,23,30,922</b>	<b>4,87,15,177</b>	-
<b>Total Expenses</b>	<b>2,10,76,277</b>	<b>2,01,71,845</b>	<b>2,11,72,873</b>	-
<b>Net Profit / (Loss) Before Tax</b>	<b>2,76,38,900</b>	<b>1,21,59,077</b>	<b>2,75,42,303</b>	-
Tax expense for current year	69,73,010	32,78,175	69,48,700	-
Deferred tax	(4,40,701)	(4,215)	(4,40,701)	-
<b>Net Profit / (Loss) After Tax carried to Reserve &amp; Surplus</b>	<b>2,06,65,890</b>	<b>88,80,902</b>	<b>2,06,12,922</b>	-
<b>Earnings Per Share (EPS)</b>	<b>2066.59</b>	<b>888.09</b>	<b>2061.29</b>	-

### FINANCIAL PERFORMANCE REVIEW

There has been no change in the business of the Company during the financial year ended 31<sup>st</sup> March, 2023. The Company has been able to generate profit before tax of Rs 2,76,38,900/- for the year 2022-23 as compared to previous year of Rs 1,21,59,077/-

### DIVIDEND

No Dividend was declared for the current financial year.

### HOLDING - SUBSIDIARY RELATIONSHIP

To expand the business activities of the company, during the year, as on 6th February 2023, the company incorporated a subsidiary VDOIT US, LLC in the United States of America with 80% ownership. However, there was no investment by the company till 31.03.2023 in the newly incorporated subsidiary. The subsidiary also did not start any operations till 31.03.2023. There is no revenue/expenditure in subsidiary company except company incorporation expenses of \$1,175 (Rs. 96,597).

### CONSOLIDATED FINANCIAL STATEMENTS

The Consolidated Financial Statements of your Company prepared in accordance with the provisions of the Companies Act, 2013. The Consolidated Financial Statements, consolidates the company

figures with VDOIT US, LLC and is presented before you along with the Standalone Financial Statement for the year ending on 31<sup>st</sup> March, 2023.

#### SHARE CAPITAL

The Authorized Share Capital as on 31<sup>st</sup> March, 2023 was Rs. 4,00,000/- divided into 40,000 Equity shares of Rs. 10 each and paid-up Share Capital as on March 31, 2023 was Rs. 1,00,000/- divided into 10,000 Equity Shares of Rs. 10 each. There was no change in the share capital of the Company during the year under report.

However, your Board shall like to take note that subsequent to the date of preparation of the Financial Statements, we increased the Authorised Share Capital to Rs. 5 Crores. Your Board would also like to take note that you have authorised issue of Bonus Shares, utilising the reserves available with your company as on 31<sup>st</sup> March, 2023. Your Board shall like to thank you for the approval for the process and looks forward to continue to take such steps for expansion of your Company.

#### DIRECTORS/KEY MANAGERIAL PERSONNEL (KMP)

There has been change in the constitution of Board during the year under review i.e., the Company made following appointment and resignations of Directors and whole time KMPs,

Sr no.	Name	Designation	Date of Appointment	Date of Resignation
1	Manu Chopra	Independent Director	9.11.2022	--
2	Kamal Gulati	Independent Director	9.11.2022	--
3	Dhamini Chhabra	Independent Director	13.12.2023	--
4	Vinita Bansal	Chief Financial Officer	4.01.2023	--
5	Shilpa	Company Secretary	23.01.2023	--
6	Rajan Malhotra	Independent Director	13.12.2023	02.03.2023

However, Directors appointed as on 9.11.2022 and 13.12.2023 Mr. Kamal Gulati, Mr. Manu Chopra and Ms. Dhamini Chhabra are regularized in Extraordinary General Meeting 3<sup>rd</sup> March, 2023.

#### PARTICULARS OF LOANS, GUARANTEE OR INVESTMENTS UNDER SECTION 186

There were no loans, guarantees or investments made by the Company under Section 186 of the Companies Act, 2013 during the year under review and hence the said provision is not applicable.

#### AMOUNT TRANSFER TO RESERVE

Profit of Rs 2,06,65,890/- was transferred to the reserves during the financial year ended 31<sup>st</sup> March, 2023.

#### EXTRACT OF ANNUAL RETURN

Pursuant to Section 92(3) of Companies Act, 2013 and Rule 12(1) of the Companies (Management and Administration) Rules, 2014, an extract of Annual Return in MGT-9 for the financial year ending 31<sup>st</sup> March, 2023 is not applicable. The Annual return of the company in form MGT-7 is available on the website of the company.

#### NUMBER OF MEETINGS OF THE BOARD OF DIRECTORS

During the period 2022-23, the Board of Directors met 11 times as per the provisions of the Companies Act, 2013 and the Articles of Association of the Company, wherever applicable.

#### RELATED PARTY TRANSACTIONS

All Related Party Transactions entered during the year were in Ordinary Course of business and at Arm's Length basis. No Material Related Party Transactions, i.e., transactions exceeding 10% of the Annual Consolidated Turnover as per the last Audited Financial Statements, were entered during the year by your

Company. Accordingly, the disclosure of Related Party Transactions as required under Section 134(3)(h) of the Companies Act, 2013 in Form AOC-2 is not applicable.

#### **EXPLANATION OR COMMENTS ON QUALIFICATIONS, RESEVATIONS OR ADVERSE REMARKS OR DISCLAIMER MADE BY THE AUDITORS AND PRACTICING COMPANY SECRETARY IN THEIR REPORTS.**

Accounts and Auditors remarks in their report are self-explanatory and do not call for any further comments.

#### **SECRETARIAL AUDITOR'S REPORT**

Company has not conducted secretarial Audit from Company Secretary in Practice as the provision of Section containing Secretarial Audit requirement as per Companies Act, 2013 and Rules made thereunder is not applicable on the Company.

#### **COST AUDITOR**

Company has not conducted Cost Audit from Cost Auditor in Practice as the provision of Section containing Cost Audit requirement as per Companies Act, 2013 and Rules made thereunder is not applicable on the Company.

#### **STATUTORY AUDITORS**

**M/s. SATINDER GOYAL & CO.**, Statutory Auditors of the Company having (FRN NO. 027334N), were appointed as Statutory Auditors of the company for a period of five (05) years in Board Meeting and their appointment is subject to ratification at the ensuing Annual General meeting of the Company.

The Company has received confirmation from **M/s. SATINDER GOYAL & CO.**, Chartered Accountants, Statutory Auditors to the effect that their proposed appointment, if made would be within the limits prescribed under Section 139 of the Companies Act, 2013.

Your directors recommend their ratification as Statutory Auditors of the Company.

#### **DIRECTORS' RESPONSIBILITY STATEMENT**

In terms of Section 134(5) of the Companies Act, 2013 the directors hereby state that:

- a) In the preparation of the Annual Accounts for the Financial Year ended 31<sup>st</sup> March, 2023, the applicable Accounting Standards have been followed along with proper explanation relating to material departures;
- b) The directors have selected such Accounting Policies and applied them consistently and made judgments and estimates that are reasonable and prudent so as to give a true and fair view of the State of Affairs of the Company as at March 31, 2023 and of the loss of the company for that period under review;
- c) The directors had taken proper and sufficient care for the maintenance of adequate accounting records in accordance with the provisions of the Companies Act, 2013 for safeguarding the assets of the company and for preventing and detecting fraud and other irregularities;
- d) The directors have prepared the Annual Accounts on a Going Concern Basis and;
- e) The directors have devised proper systems to ensure compliance with the provisions of all applicable laws and that such systems were adequate and operating effectively.

#### **STATEMENT ON DECLARATION GIVEN BY INDEPENDENT DIRECTOR U/S 149 (6)**

Your Company has received necessary declaration from each independent director under section 149(7) of the Companies Act, 2013 that they meet the criteria of independence laid down in section 149(6) of the Companies Act, 2013. The Independent Directors of the Company have confirmed that they have enrolled themselves in the Independent Directors' Databank maintained with the Indian Institute of Corporate Affairs ('IICA') in terms of Section 150 of the Act read with Rule 6 of the Companies (Appointment & Qualification of Directors) Rules, 2014.

**MATERIAL CHANGES AND COMMITMENTS, IF ANY, AFFECTING THE FINANCIAL POSITION OF THE COMPANY WHICH HAVE OCCURRED BETWEEN THE END OF THE FINANCIAL YEAR OF THE COMPANY TO WHICH THE FINANCIAL STATEMENTS RELATE AND THE DATE OF THE REPORT**

No material changes and commitments affecting the financial position of the Company occurred between the end of the financial year to which these financial statements relate on the date of this report.

**CONSERVATION OF ENERGY AND TECHNOLOGY ABSORPTION**

As required under Section 134(3)(m) of the Companies Act, 2013 read with rule 8 of Companies (Accounts) Rules 2014, details of conservation of energy, technology absorption, foreign exchange earnings and outgo are as follows:

**(A) Conservation of energy:**

Energy conservation is an area of priority and the Company has made all efforts to ensure continuous monitoring and improvement in energy consumption in all its offices.

**(B) Technology absorption:**

Being in the business of providing clean energy, the Company is constantly looking at innovation and technology absorption to increase production efficiency in its business.

Statement giving the details of conservation of energy, technology absorption and foreign exchange earning & outgo in accordance with requirements of Section 134 (3)(m) of the Companies Act, 2013 read with Companies (Accounts) Rules, 2014, is as follows: -

**(C) Foreign Exchange Earnings and Outgo**

The foreign exchange earnings and outgo during the year as follows: -

Foreign Exchange Earning	2,53,91,980
Foreign Exchange Outgo	-

**RISK MANAGEMENT POLICY**

The Company has developed a very comprehensive risk management policy and the same is reviewed by the Management at periodical intervals, about the risk assessment and minimization procedures adopted by the management. At the corporate level major risks are reviewed by the Directors and directions in this regard are issued accordingly. Key business risks and their mitigation are considered in the annual/strategic business plans and in periodic management reviews. The risk management process in our multi-business, multi-site operations, over the period of time will become embedded into the Company's business systems and processes, such that our responses to risks remain current and dynamic.

**SIGNIFICANT AND THE MATERIAL ORDERS PASSED BY THE REGULATORS OR COURTS**

There are no significant material orders passed by the Regulators/Courts which would impact the going concern status of the Company and its future operations.

**PREVENTION OF SEXUAL HARASSMENT AT WORKPLACE**

The Company has adopted a prevention of Sexual Harassment Policy in line with the requirements of the Sexual Harassment of Women at the Workplace (Prevention, Prohibition and Redressal) Act, 2013 and the Rules thereunder for prevention and redressal of complaints of sexual harassments at workplace. All women associate/s (permanent, temporary, contractual and trainees) as well as any woman visiting the Company's office premises or women service providers are covered under this Policy.

During the year under review, no complaint was received by the Company related to sexual harassment.

### CORPORATE SOCIAL RESPONSIBILITY INITIATIVES

No disclosures on Corporate Social Responsibility are required as provision under Section 135 of the Companies Act, 2013 and Rules made thereunder are applicable on the Company.

### DEPOSITS

The Company has not accepted any deposits from the public as defined in the Section 73 to 76 of the Companies Act, 2013.

### SHARES

- a. **Buy Back of Securities**  
The Company has not bought back any of its securities during the year under review.
- b. **Sweat Equity**  
The Company has not issued any Sweat Equity Shares during the year under review.
- c. **Bonus Shares**  
No Bonus Shares were issued during the year under review.
- d. **Employees Stock Option Plan**  
The Company has not provided any Stock Option Scheme to the employees.

### PERSONNEL

The provisions of Section 197 read with Rule 5 of Companies (Appointment and Remuneration) Rules, 2014 are applicable to your Company and during the period under consideration, no employee of the Company was in receipt of remuneration exceeding the sum prescribed under section 197 of the Companies Act, 2013 read with Rule 5(2) of the companies (Appointment and Remuneration of Managerial Personnel) Rules, 2014.

### ACKNOWLEDGEMENT

Your directors place on records their gratitude to the Company's valued Customers, Suppliers, Central and State Government authorities, Bankers and Shareholders for their continued support and confidence and to the employees for their dedicated services.

**For and on behalf of Board**

**VDOIT TECHNOLOGIES LIMITED (FORMERLY Vdoit Technologies Private Limited)**



**NARINDER KUMAR KAMRA**  
**MANAGING DIRECTOR**  
**DIN: 07102531**



**NEETU GUPTA**  
**DIRECTOR**  
**DIN: 07102599**

**Date: 10<sup>th</sup> July, 2023**

**Place: GURUGRAM**