

**POLICY ON PREVENTION OF SEXUAL HARASSMENT AT
WORKPLACE (POSH)**

CSA INVESTMENTS PRIVATE LIMITED

(Formerly known as CISFIN Investment Solutions Private Limited)

1. INTRODUCTION

CSA Investments Private Limited (*Formerly known as CISFIN Investment Solutions Private Limited*) (hereinafter referred to as “**CSA Advisor**” or “**the Company**”) strives to create a safe and inclusive workplace that welcomes individuals of all genders, castes, races, ethnicities, colors, social and civil statuses, and physical abilities.

This Policy has been created in accordance with the Sexual Harassment of Women at Workplace (Prevention, Prohibition, and Redressal) Act, 2013, and the rules framed under it (hereinafter referred to as “**the Act**”). Sexual harassment is strictly prohibited and will not be tolerated within our organization. This Policy applies to all stakeholders including but not limited to employees, including permanent, temporary, contractual, and interns, as well as vendors, clients, and visitors. The Policy covers all the key aspects of the Act and for any further clarification, reference shall always be made to the Act and the provisions of the Act shall prevail.

We treat each other with respect and dignity, and we expect everyone to promote a sense of personal responsibility. We hire competent and motivated people who respect our values, provide equal opportunities for their development and advancement, protect their privacy, and do not tolerate any form of harassment or discrimination. This Policy takes complete cognizance of the latest legislation by the Government of India, “**The Sexual Harassment at Workplace (Prevention, Prohibition, and Redressal) Act 2013,**” and its rules published on December 9th, 2013. This Act aims to protect against sexual harassment of women at workplace for the prevention and redressal of complaints of sexual harassment and the matters connected herewith or incidental thereto.

It is important to note that if any instances of sexual harassment are not explicitly covered in this Policy, then the Act would be applicable. In case of any conflict between the Policy and the Act, the Act will prevail. This Policy is in place to protect against sexual harassment at the workplace and to address any complaints of sexual harassment and related matters.

All employees are expected to maintain the highest standards of ethical conduct in all their interactions with business stakeholders and at the workplace. This means that employees have a responsibility to:

- i) Treat each other with dignity and respect.
- ii) Follow the letter and spirit of the law.
- iii) Avoid any unwelcome behaviour that has a sexual connotation.
- iv) Avoid creating a hostile environment at the workplace through sexual harassment.
- v) Report any incidents of sexual harassment they experience or witness to the appropriate authorities and follow the complaint handling procedure of the organization.

2. SCOPE

CSA Investments Private Limited and its Subsidiary(ies) are committed to providing a healthy work environment for all employees and promoting equal employment opportunities. The Company is dedicated to prevent discrimination, gender biasness, and harassment in the workplace. All employees are entitled to a non-discriminatory working environment, regardless of their race, caste, religion, color, ancestry, marital status, gender, sexual orientation, age, nationality, ethnic origin, or disability. The Company believes that every employee has the right to be treated with respect and dignity. Sexual harassment is a serious and punishable offense, whether it occurs in the workplace or outside, involving an employee or employees.

This Policy is effective immediately, and individual managers are responsible for ensuring that it is implemented within their respective areas. The HR department owns this Policy and is responsible for maintaining, reviewing, and updating it regularly. If there are any questions regarding the interpretation or implementation of this Policy, you are requested to speak with the HR department.

Complaints related to this Policy will be addressed by the Internal Committee of the respective location, in accordance with the guidelines provided.

3. DEFINITIONS

Act: The Sexual Harassment at Workplace (Prevention, Prohibition, and Redressal) Act, 2013.

Aggrieved Person: In relation to the workplace, any person of any gender or age who alleges to have experienced sexual harassment by the respondent, whether employed or not.

Complainant: Any individual, regardless of gender identity, who files a complaint alleging sexual harassment under this Policy.

Competent Authority: In exercising any Power under this Policy, the Head of the Human Resources Department must be consulted.

Employee: This text describes the definition of a person who is employed at a workplace. This includes individuals who work on a regular, temporary, ad-hoc, or daily wage basis, whether directly or through an agent or contractor. It also includes those who work voluntarily or under any other arrangement, whether express or implied. The term "person employed" encompasses co-workers, contract workers, probationers, trainees, apprentices, or anyone else who is employed by the workplace.

Employer: A person responsible for management, supervision, and control of the workplace. For the implementation and execution of this Policy and IC recommendations, the Employer will be the Company.

Internal Complaints Committee: Means an Internal Complaints Committee constituted under Section 4 of the Act. to receive and inquire complaints pertaining to sexual harassment at Workplace and provide its final recommendations to the Employer, i.e. management of the Company for implementation.

Local Committee: Means the Local Complaint Committee constituted under Section 6 of the Act.

Respondent: A Respondent is an employee of the Organisation against whom a complaint of sexual harassment has been made by the aggrieved person under this Policy.

Sexual harassment: Sexual harassment can happen when someone uses sexual behaviour to control, influence, or affect the career, salary, or job of another person. It can also occur between co-workers or an employee and someone the employee deals with during work, who is not employed by the organization. Sexual harassment includes any unwelcome acts or behaviours, directly or implied, which may include but are not limited to:

Any unwelcome sexually determined behaviour, or pattern of conduct, that would cause discomfort and/or humiliate a person at whom the behaviour or conduct was directed namely:

- i) Unwelcome sexual advances involving verbal, non-verbal, or physical conduct, implicit or explicit.
- ii) Physical contact and advances including (but not limited to) touching, stalking, sounds which explicit and /or implicit sexual connotations/overtones, molestation.
- iii) Teasing, Voyeurism, innuendos and taunts with an implicit sexual connotation, physical confinement, and /or touching against one's will.
- iv) Demand or request for sexual favours.
- v) Sexually coloured remarks or remarks of a sexual nature about a person's clothing or body.

- vi) Display of pictures, signs, etc. with sexual nature/ connotation/ overtones in the work area and work-related areas.
- vii) Showing pornography, making or posting vulgar/indecent / sexual pranks, teasing, jokes, demeaning or offensive pictures, cartoons, or other materials through email, SMS, MMS, gestures, etc.
- viii) Repeatedly asking to socialize during off-duty hours or continued expressions of sexual interest against a person's wishes.
- ix) Giving gifts or leaving objects that are sexually suggestive.
- x) Eve teasing, innuendos and taunts, physical confinement against one's will or any such act likely to intrude upon one's privacy; Persistent watching, following, and contacting of a person; and
- xi) Any other unwelcome physical, verbal, or non-verbal conduct of a sexual nature.
- xii) Implied or explicit promise/ threat of preferential or detrimental treatment in employment in relation to any sexually determined act/ sexual favour.

This Policy covers alleged instances of sexual harassment, whether they occur during or outside the office hours. It is important to note that whether harassment has occurred or not is determined by the experience of the aggrieved person, rather than the intentions of those involved.

Workplace: This section refers to all the locations, establishments, enterprises, institutions, offices, branches, or units that are established, owned, or controlled by the Company, collectively referred to as "Premises." It also includes any places visited by an employee during the course of his employment, including official events, transportation, and accommodation provided by the employer for undertaking such journeys.

4. CONSENSUAL SEXUAL RELATIONSHIP AT WORKPLACE

CSA Advisor discourages any form of romantic or sexual relationships among its employees. Such relationships can lead to conflicts of interest at work. If any such relationship exists, particularly between a member of management or other supervisory employee and their direct or indirect reporting party, the involved parties should inform the Company's management. This is so that the reporting chain can be altered to ensure that no direct or indirect reporting relationship continues. This step is taken in the best interests of the parties and the Company.

5. APPLICABILITY

This Policy applies to all individuals associated with the Company, including employees and those engaged on a project basis, both within India and internationally. It is an integral part of the employment terms for all Company employees in India and its subsidiaries, ensuring compliance with local laws. In other jurisdictions, local laws supersede this Policy wherever applicable.

This Policy encompasses co-founders, employees, consultants, trainee associates, interns, external experts, project-based personnel, and students, irrespective of their location. It extends to all work-related settings and activities, whether within the workplace, during business trips, or at social events organized by Team Members. This includes virtual settings such as WhatsApp Groups, virtual meeting platforms, productivity or project management platforms, and any engagements related to social work undertaken by the Company.

The Company commits to inform necessary information to all individuals covered by this Policy, ensuring they are aware of the ways to prevent sexual harassment. Furthermore, the Company will ensure transparent dissemination of this Policy by publicly displaying it alongside the contact details of designated Internal ICC members and authorized external parties for complaint process.

6. ACTIONS IDENTIFIED AS SEXUAL HARASSMENT

Sexual harassment encompasses a range of unwelcome behaviours, both explicit and implied, which create discomfort, intimidation, or offense. These behaviours include:

- i) Physical contact or advances, such as touching or stalking.
- ii) Requests for sexual favours.
- iii) Making sexually suggestive remarks or jokes.
- iv) Displaying pornography or sexually suggestive material.
- v) Creating a hostile work environment that disadvantages the complainant in terms of employment, privileges, benefits, or career progression.
- vi) Repeatedly asking for romantic involvement.
- vii) Teasing, voyeurism, innuendos, or taunts that intrude upon privacy or cause discomfort.
- viii) Off-colour verbal "kidding," offensive flirtations, or propositions.
- ix) Continued verbal abuse or degrading comments about an individual's appearance.
- x) Subtle pressure for sexual activity or inappropriate physical contact.
- xi) Any other unwelcome verbal, non-verbal, or physical conduct of a sexual nature.

In all professional interactions, whether within the workplace or with business stakeholders, Team Members are expected to maintain the highest ethical standards. They are obliged to:

- i) Treat each other with respect.
- ii) Adhere to both the letter and spirit of the law.
- iii) Refrain from engaging in any unwelcome behaviour of a sexual nature.
- iv) Avoid creating a hostile work environment through sexual harassment.
- v) Report instances of sexual harassment experienced personally or witnessed to the appropriate authorities, following the company's complaint handling procedure.

Certain actions, even if occurring in the context of hiring, firing, performance appraisal, or promotions, may constitute sexual harassment if connected with or related to such behaviour. These include:

- i) Implicit or explicit promises of preferential treatment or threats of detrimental treatment in employment.
- ii) Threats regarding present or future employment status.
- iii) Interference with work or creating an intimidating, offensive, or humiliating environment likely to affect community members' health or safety.

All forms of communication, whether in person, over the phone, via email, messaging apps, or any other medium, are subject to these prohibitions.

It's important to note that occasional compliments or consensual personal relationships aren't considered sexual harassment unless they involve discriminatory acts. However, the Company intends to prevent conflicts of interest, and any romantic or sexual advances toward colleagues are unacceptable unless explicitly agreed upon and disclosed to management.

Determining sexual harassment requires considering the reasonableness of behaviour, and assessing whether it causes the victim to feel offended, ashamed, or afraid. Conduct is evaluated objectively, taking into account its potential to humiliate or intimidate, and considering the context in which it occurs.

7. RESPONSIBILITIES OF MANAGERS

All managers have the responsibility to prevent any form of harassment and ensure equal treatment for all employees. They must also make it clear to everyone that harassment will not be tolerated in any shape or form. Complaints regarding harassment will be taken seriously, and the complainant, respondent, or witnesses will not face any form of victimization.

8. INTERNAL COMPLAINTS COMMITTEE (ICC)

The company has an Internal Committee (ICC) that investigates sexual harassment allegations. The ICC ensures complainants receive full support and confidentiality. The Policy prohibits retaliation against complainants or witnesses and provides swift action against alleged offenders.

Functions & Powers of ICC

- i) The Internal Complaints Committee is tasked with organizing gender sensitization programs for executives and employees. These programs, may include workshops, seminars, etc., which aim to foster awareness and understanding of gender issues in the workplace. If necessary, the committee may seek assistance from specialized NGOs or Ethics Counsellors.
- ii) The Internal Complaints Committee meeting would convene at least once annually, even in the absence of active cases, to assess and ensure compliance with the requirements of the Sexual Harassment of Women at Workplace (Prevention, Prohibition, and Redressal) Act, 2013 within the Company.
- iii) A quorum consisting of 2/3rd of the committee members is required for meetings or hearings. However, this requirement is not mandatory for adjourned meetings.
- iv) The Chairperson, serving as the Presiding Officer of the Internal Complaints Committee, holds veto power, ensuring effective decision-making and leadership within the committee.
- v) Tenure: The Chairperson and every member of the committee serve a term of up to three years from the date of their appointment. This ensures continuity and accountability within the committee's composition over time.

Members of ICC

S.No.	Name	Designation	E-mail Id
1	Ms. Nishi Singh	Presiding Officer	HR@csa-advisor.com
2	Ms. Shristi Rajpurohit	Member	shristi@csa-advisor.com
3	Ms. Ritika Kapoor	Member	Ritika.Kapoor@csa-advisor.com
4	Mr. Sahil Sharma	Member	sahil.sharma@csa-advisor.com
5	Ms. Navya Gupta	External Member	ng.navyagupta@gmail.com

Duties and Functioning of ICC

The Internal Complaints Committee (ICC) is committed to maintaining meticulous records of observed and reported incidents for future reference.

The ICC ensures transparency in its operations by disclosing necessary information to stakeholders as needed or required by them. Investigations into complaints are conducted with adherence to the principles of natural justice.

Integrity and impartiality are paramount for the ICC, which strives to set high standards for its daily operations. Performance metrics, initiatives, timelines, record-keeping, and member evaluations are developed to guide its functioning.

Confidentiality is rigorously maintained regarding the identities of individuals involved, incident details, and resolution proceedings. Information is disclosed only when necessary to prevent greater harm, with decisions requiring a majority vote for execution.

A secretary may be appointed by the ICC to facilitate meeting coordination and documentation. Comprehensive records, including minutes and video recordings of meetings, are maintained to ensure transparency and accountability.

9. PROCEDURE FOR FILING AND DEALING WITH THE COMPLAINTS

The ICC shall adhere to the procedures and timelines stipulated in the Sexual Harassment of Women at Workplace (Prevention, Prohibition, and Redressal) Rules, 2013.

Dealing with Complaints

- i) Complaints should be promptly submitted in writing following an incident. If necessary, the HR Manager may assist the complainant in drafting a written statement and in cases where an employee is unable to write, the HR Manager will record a verbal complaint. If the complainant feels unable to disclose their identity to the Panel members for specific reasons, they may address the complaint directly to the Presiding Officer of the ICC.
- ii) Complaints may be lodged in writing directly with the ICC or any applicable ICC Member. Complaints can be submitted via email to hello@csa-advisor.com, and the complainant's identification details, including name, address, phone number, company email address, and designation, should be provided to the ICC. Anonymous complaints will not be considered by the ICC.
- iii) The complainant has the option to file a police complaint in cases of serious offenses, with the Company providing support to the potential victim if such action is taken. Upon receiving a complaint or being informed by a supervisor or manager of a potential Policy violation, all employees and consultants are obligated to report such incidents to any ICC member. The ICC may consult with the company's legal counsel in reviewing complaints.
- iv) The ICC must inform the complainant about informal complaint mechanisms. If the complainant rejects an informal resolution, the ICC will initiate an investigation to determine the validity of the alleged Policy violation.
- v) If necessary, measures will be taken to separate the complainant and the respondent during the investigation, such as internal transfers or administrative leave.
- vi) During the initial meeting of the complaint committee, the complainant's statement will be recorded, along with any collaborative material provided to substantiate the complaint.
- vii) Subsequently, the accused will be notified of the complaint and given an opportunity to respond during a meeting with the complaint committee, followed by an inquiry process.

- viii) The ICC will conduct interviews with the complainant, respondent, and any witnesses as part of the investigation to determine the veracity of the alleged conduct.
- ix) If the complaint does not fall under the purview of sexual harassment or if it is found to lack substance, the complaint may be dismissed by the committee, with reasons recorded accordingly.
- x) In the event that a complaint is found to be false at any stage, the complainant will face appropriate disciplinary action.
- xi) If a complaint involves a member of the Panel, that member will not be permitted to participate in the inquiry committee.

Informal Complaints Procedure

Upon acceptance of a complaint, the ICC may give an option to the complainant for seeking resolution through conciliation as the primary approach. This involves identifying any potential misunderstandings or miscommunications and exploring steps to amicably settle the matter between the complainant and the accused. However, this process can only commence if the complainant agrees to it.

Informal methods for addressing sexual harassment may include the following actions:

- i) Providing the employee with an opportunity to directly communicate to the offender that their conduct was unwelcome.
- ii) Seeking confidential guidance on potential solutions from a supervisor, trusted colleague, or a designated officer trained to handle sexual harassment issues.
- iii) Requesting a supervisor or relevant officer to privately and informally address the offender on behalf of the concerned employee.

Resolution procedure through conciliation

Upon arriving at a settlement, the internal complaint committee will document the resolution and provide copies to both parties and the employer, effectively ending the investigation.

If the person who filed a complaint informs the internal complaint committee that the respondent has not complied with any of the terms or conditions of the settlement that was reached through conciliation, the committee will investigate the complaint and award the necessary decision. If necessary, the committee may forward the complaint to the police for required actions.

Formal Complaints Procedure

An employer should have a formal procedure in place for handling complaints of sexual harassment in the workplace. Employees should not be required to try informal resolution methods before lodging a formal complaint. When investigating the complaint, the principles of natural justice must be followed. This includes ensuring a balance of information from both the victim and the alleged perpetrator of the harassment. The perpetrator must be fully informed of the complaints lodged against them and be given an opportunity to respond. Similarly, victims of sexual harassment must be fully informed of the perpetrator's response to the charges filed against them and have the opportunity to respond. To ensure justice and equality, three basic requirements need to be met in any situation.

- i) Both parties shall receive a notification of any complaints or accusations against them, and the procedure for addressing these issues.
- ii) Both parties should have a chance to be heard and share their input regarding the complaint or accusation.

- iii) The decision-makers must act with honesty, impartiality, and without any biasness.

If an enquiry is ongoing, the internal complaint committee may recommend the employer to take certain actions. For instance, on the written request of the aggrieved complainant, the committee may recommend the transfer of either the complainant or the respondent to a different workplace. Alternatively, the committee may recommend that the employer should grant leave to the aggrieved complainant. Once the committee makes its recommendations, the employer is obligated to implement them and send a report of such implementation to the committee.

Enquiry Procedure

- i) In the event that either party (the complainant or the accused) disagrees with the conciliation process, the ICC will proceed with its investigative proceedings, which will involve obtaining statements from witnesses.
- ii) The ICC will promptly initiate the enquiry and inform both the complainant and the accused accordingly. All proceedings of the enquiry will be meticulously recorded, and the presence of all parties at communication meetings will be endorsed as a token of authenticity.
- iii) The ICC will provide the accused with the statement of allegation and offer an opportunity to submit a written explanation, if desired, within 15 days of receipt. The complainant will be furnished with a copy of the Statement of Defence submitted by the accused and allowed to respond, if deemed necessary by the ICC, without reiterating the complaint itself.
- iv) If either party wishes to call witness(es), they must communicate the names of the witness(es) in writing to the ICC. Any documents intended to be tendered as evidence must be supplied as true copies to the complaint committee by the respective party, with their signature certifying their authenticity.
- v) The committee will summon all witnesses mentioned by both parties, beginning with those of the Complainant. Disputed facts will be verified through corroboration with witness narratives and other evidence.
- vi) Each party will have the right to cross-examine the other party and its witnesses. However, in highly sensitive matters, face-to-face interactions between the victim and the accused will only occur with the victim's consent. In such instances, the committee will conduct the cross-examination of the victim on behalf of the accused.
- vii) The complaint committee will afford every reasonable opportunity to the complainant and the accused to present and defend their respective cases.
- viii) The complaint committee will expedite the Enquiry process and communicate its findings and recommendations for disciplinary action to the appointing authority. The Presiding Officer/Chairperson will direct the employer to take action in accordance with the ICC's recommendations.
- ix) The complaint committee will be governed by rules framed by the ICC, considering best practices from India and abroad. The ICC may conduct as many hearings as necessary to ensure adherence to the principles of natural justice.

Obligations of the ICC

- i) Notify employees of their right to press separate charges against the alleged harasser, depending on the nature of the sexual harassment.
- ii) Take care to not disadvantage the complainant or prejudice the alleged harasser if the claim is found to be unwarranted.

- iii) Provide the alleged harasser with an opportunity to tell their version of the story and identify all supporting witnesses.
- iv) Ensure that the investigation and grievances are handled in a manner that keeps the identities of the persons involved and all records relating to the harassment complaint confidential.
- v) Ensure that provisional working arrangements are made if necessary to ensure that the alleged victim and perpetrator can continue working in a safe environment while the case is being investigated. This could include a temporary relocation of the accused to a different workspace.

Documentation

All details related to any incidents, complaints, investigations, hearings, evidence, conclusions, agreements, and closures will be recorded and documented in soft copy format. The International Criminal Court (ICC) will securely maintain these records and share the relevant documentation with both the complainant and the accused.

Final Meeting and Report

Upon completion of the investigation process, the members of the ICC shall hold a final meeting to prepare a report. This report will contain recommendations for the management to execute the final decision. It is important to note that this report is confidential. If the act in question falls under the scope of sexual harassment, the ICC may recommend one or more actions as stated in Clause 10 of the Policy.

However, if the investigation reveals that the complaint is frivolous, false, or lodged with malicious intent, appropriate disciplinary actions can be taken against the complainant. If the ICC determines that the degree of offense is severe enough to warrant a criminal case, they will mention this in their report. The employer will then initiate appropriate action to file a Police Complaint.

In the event that the matter is a mere misinterpretation of events and the complainant and accused agree to this in writing, the ICC will recommend that no action be taken against either party and the same would be reflected in the Report.

If the sexual harassment is found to have occurred as a result of an act or omission by a third party or outsider, the Company is responsible for taking all necessary and reasonable steps to support and assist the affected person/Victim which includes taking preventive actions.

Timelines

The ICC (Internal Complaints Committee) has a set of timelines in place for its activities related to sexual harassment complaints. These timelines are as follows:

Accepting a complaint: Any complaint regarding sexual harassment can be accepted if it is reported within **90 days** of the occurrence of the incident.

Initiating the investigation proceedings: After receiving the complaint, the ICC has 10 days to initiate the investigation proceedings, unless it is a matter of extreme urgency.

Investigation: The ICC shall complete the Investigation within 90 days .

Submission of report: The ICC must submit its report to the management within 10 days of completing the investigation. Thereafter, the management has 60 days to implement the suggestions made in the report.

These timelines are prescribed and mandated, and must be followed in all instances except in cases where the complainant, accused, or ICC can provide a valid written reason for an extension, accepted by all parties involved.

10. GUIDELINES ON THE RECOMMENDATIONS TO BE SUGGESTED BY ICC

The recommendations proposed by the ICC after investigating a complaint may vary depending on the severity of the offense committed by the accused. Sexual harassment complaints may have one or more of the following categories: mental trauma, emotional damage, physical harm, and professional damage.

The recommendations may include the following options: a formal apology, either public or private, counselling, a written warning to the accused with a copy maintained in the employee's file, a change of work assignment, or a transfer for either the accused or the complainant, suspension or termination of services of the guilty employee, demotion of the guilty employee, and a direction to the accused to pay monetary compensation to the complainant.

11. CONFIDENTIALITY OF THE PROCEEDINGS

Any complaints received will be handled with the utmost confidentiality among all parties involved, including the members of the ICC. Anyone who violates the confidentiality requirements will face financial and legal consequences. The penalty for violating confidentiality will be determined by the ICC. If any member of the ICC breaches confidentiality, the remaining members will determine the penalty and required action. If all or a majority of the ICC members violate the confidentiality requirements, they will be removed from the ICC and the board of directors of the company will determine the penalty and required action.

12. ANNUAL REPORT

The Internal Complaints Committee (ICC) will prepare an Annual Report according to the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, comprising the following details:

- i) Number of complaints of sexual harassment received during the year.
- ii) Number of complaints disposed of during the year.
- iii) Number of cases pending for more than ninety days.
- iv) Number of workshops or awareness programs conducted against sexual harassment.
- v) Nature of action taken by the employer.

This report shall be submitted to the concerned government department as a part of statutory compliance.

13. APPEAL

Appeals against administrative or disciplinary action can be made to the Head of Human Resources within 7 days of the investigation's conclusion and communication of consequences.

14. POLICY OWNER

Legal and HR function owns this Policy and will be responsible for effective implementation of the Policy at CSA Advisor and its subsidiaries. The Management reserves all right to append, modify, withdraw any part or complete Policy at any time and same shall be communicated in writing by HR.

Employee Declaration

This is to acknowledge that I have read and understood my organization's HR Policy on Sexual Harassment at Workplace drawn as per the provisions of the Act (Prevention, Prohibition & Redressal of Sexual Harassment at Workplace Act, 2013).

I hereby give my acceptance to adhere to this Policy at all times and understand that any breach/noncompliance on my part may result in formal investigations and may lead to disciplinary action against me as per the provisions of the Act.

Name:

Signature

Date: