

Policy name- Prevention of sexual harassment policy
Version number – SIL/2025/08.006
Approval Date- 15/10/2025
Revision Date- 02/05/2025
Policy Effective Date- 1/10/2025

SUMADHURA

FOUNDATION OF HAPPINESS

<u>Prepared & verified by</u>	<u>Approval L1</u>
K Jeevana Rao IC – Presiding Officer	Giridhar Kumar COO
	

PREVENTION OF SEXUAL HARASSMENT POLICY

1. BACKGROUND

As an equal employment opportunity workplace, the Company is committed to creating a healthy working environment that enables employees to work without fear of prejudice, gender bias and sexual harassment.

The right of all women working or visiting any Sumadhura workplace whether in the capacity of regular, temporary, ad hoc, or daily wages basis is protected under this Act. It includes all women whether engaged directly or through an agent including a contractor, with or without the knowledge of the principal employer. Further, she could be a co-worker, a contract worker, probationer, trainee, apprentice, visitors or called by any other such name.

The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (Act) has directed companies to lay down guidelines and a forum for redressal of grievances related to sexual harassment. This document caters for the same.

2. SCOPE

At Sumadhura, this policy aims to create and maintain a safe, inclusive, and respectful workplace, free from any form of sexual harassment. It applies to all women employees, as well as all other employees, contract staff, interns, consultants, vendors, and visitors, at all work-related premises, events, or activities. While formal complaints under the POSH Act can be raised by women employees, the organization encourages reporting of any inappropriate behavior by or against any individual, regardless of gender, sexual orientation, or gender identity, and will take appropriate action under internal policies.

3. DEFINITION OF WORKPLACE

Workplace” includes any place visited by an Employee arising out of or during the course of the employment including transportation provided by the firm and outstation stay for work related purposes. It does not only include physical workspaces but also spaces from where work is carried out remotely or virtually. For example:

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- All offices or other premises where the Firm's business is conducted.
- All Firm related activities performed at any physical or virtual site.
- Any social, business or other functions taking place physically or virtually where the conduct or comments may have an adverse impact on the workplace or workplace relations.
- Any alleged act of sexual harassment committed during or outside office hours, using any mode of communication—including video calls, audio calls, phone calls, text messages, emails, social media platforms, or any other electronic medium—will be addressed under this policy if it is connected to work or affects the workplace environment. The Internal Complaints Committee (ICC) will investigate such complaints and take appropriate action in accordance with the POSH Act and internal company procedures.
- Any sexual harassment on any social networking website during or outside of office hours
- Any place visited by Employee or arising out of or during the course of employment with Firm, including transport services provided by Firm for undertaking such journey, audio/video conferencing applications or any other communication related tools/applications. For example, Employees who are on overseas programs and trainings in course of their employment with the Firm.

4. GENERAL PROCEDURE

- Employees may file a complaint of sexual harassment with the Chairperson of the Internal Committee (IC). Complaints can be submitted in writing or via email. However, as per the POSH Act, the complaint must be signed by the complainant.
 - If submitted by email, a scanned copy of the signed complaint must be attached.
 - Alternatively, a handwritten or printed and signed hard copy may be submitted directly to the IC.
 - Refer to Annexure 5 for the POSH Complaint Form to be used while submitting a complaint.
- The complainant may choose to proceed with either a formal or informal inquiry. The IC or any of its members shall not interfere with or influence the complainant's decision regarding the preferred mode of inquiry.
 - Informal Inquiry: Focuses on resolving the matter through counseling, mediation, or mutual understanding without initiating a formal investigation process.
 - Formal Inquiry: Involves a structured investigation by the IC, including examination of evidence, interviews, and documentation, in accordance with the POSH Act.

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- The Internal Committee (IC) will conduct all investigations in a thorough, prompt, free, and fair manner. The process may include private interviews with the complainant, the respondent (the person alleged to have committed the offence), and any witnesses.
- The complainant will be informed of the outcome of the investigation. The inquiry shall be completed within 90 days from the date of the complaint. Every effort should be made to complete it within 30 days, wherever possible.
- If the investigation concludes that sexual harassment has occurred, the IC will submit its findings and recommendations for appropriate disciplinary action. The Board of Directors/Management will review these recommendations and determine the final disciplinary action, while the HR team will ensure its implementation in line with organizational policies and the provisions of the POSH Act.
- The HCM will maintain a complaint register to record details of all complaints received and the process followed.
- The HCM will also report to the concerned government authority (State/Central) regarding complaints received and actions taken, as required under the POSH Act.

5. TIMELINES AS PER THE ACT

- A complaint of sexual harassment should be filed within three months from the date of the last incident. In exceptional cases, the Internal Committee (IC) may extend the filing period by up to three additional months if it deems there is sufficient reason for the delay, in accordance with the POSH Act.
- Notice to the Respondent Within 7 days of receiving copy of the complaint.
- Respondent to file his reply Within 10 days of receiving copy of the complaint.
- Completion of enquiry Within 90 days
- Submission of Report by IC/Designated Officer to employer Within 10 days of completion of the inquiry.
- Implementation of Recommendations Within 60 days
- Appeal Within 90 days of the recommendations
- File Returns to the authorities annually

6. SEXUAL HARASSMENT WILL MEAN AND INCLUDE ANY OF THE FOLLOWING:

- Unwelcome sexual advances, requests or demands for sexual favours, either explicitly or implicitly, in return for employment, promotion, examination or evaluation of a person towards any company activity.
- Unwelcome sexual advances may include verbal, non-verbal, or physical conduct such as sexually coloured remarks, jokes, letters, phone calls, e-mail, sexually suggestive gestures, showing of pornography, physical contact or molestation, stalking, display of

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pictures, signs, verbal, or non-verbal communication which may be deemed to offend the individual's sensibilities and/or affect her/his performance.

- Eve-teasing, innuendos and taunts, physical confinement against one's will and acts which are likely to intrude upon one's privacy.
- Unwelcome/offensive gestures by an employee having sexual overtones.
- Unwelcome/offensive jokes, gestures, comments and repartee, offensive words on clothing/dress.
- Unwelcome/offensive touching and/or any other bodily contact.
- Repeated requests for meeting outside of the workplace that are turned down or unwelcome/ offensive flirting.
- Transmitting or posting emails or pictures of a sexual or other harassment-related nature.
- Displaying sexually suggestive objects, pictures, or posters.
- Playing sexually suggestive music.
- Acts or conduct at the workplace or outside of the workplace which falls under the definition of sexual harassment.
- Any other activity as deemed sexually offensive.

7. THE INTERNAL COMMITTEE (IC)

The IC has been constituted by the CMD/Board of Directors to consider and redress any complaints of Sexual Harassment received by the Company against a Company employee.

The IC constitutes as follows:

- Presiding Officer
- Member
- Member
- Member
- External Member
- The Internal Committee (IC) shall be constituted such that more than 50% of its members are women..
- The IC will be valid for 3 years from the constitution.
- The IC will meet in once in quarter.
- A quorum of 3 members is required to be present for the meeting of the IC one of whom shall be a lady.
- The meeting agenda and minutes of the meeting of the IC is prepared and filed.
- The management will review the findings of the IC and take suitable action against any Company employee and any of its vendors, contractors or consultants employee found guilty of an act of sexual harassment.

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8. REDRESSAL PROCEDURE

- Any employee who feels that he/she is being sexually harassed, directly or indirectly, may submit a complaint of the alleged incident to any member of the IC in writing with their signature within 3 months of occurrence of such incident. The IC may, at its sole discretion, extend this time limit by up to 3 more months if it is satisfied that the circumstances were such which prevented the complainant from filing of the complaint within the period of 3 months.
- The IC will maintain a register to record all complaints received by them and keep the contents confidential, if it is so desired, except to use the same for investigation.
- The IC shall normally forward a copy of complaint to the person against whom the complaint has been made, within 7 working days of receipt of the complaint, or within such time period as it may deem reasonable and give him/her an opportunity to submit a written explanation if he/she so desires.
- The IC will hold a meeting with the Complainant within 5 days of receipt of the complaint, but no later than 10 days in any case.
- At the first meeting, the Committee members shall hear the Complainant and record her allegations. The Complainant can also submit any corroborative material and/or documentary proof, oral or written material, etc., to substantiate their complaint. (The complainant or the respondent may be assisted by a third party in exceptional circumstances, with the approval of the Internal Committee (IC). This is not a default provision and will be allowed only when deemed necessary by the IC to ensure a fair and unbiased inquiry).
- Thereafter, the person against whom the complaint has been made will be called for deposition before the Committee and an opportunity will be given to him/her to give an explanation.
- The IC may, before initiating an inquiry and at the request of the Complainant, take steps to settle the matter between the Complainant and the person against whom the complaint has been made through conciliation, provided that no monetary settlement shall be made as a basis of conciliation. Refer to Annexure 4 for Process flow.
- Thereafter, the Committee will investigate the complaint and will consider additional witnesses and/ or evidence as necessary.
- In the event the complaint does not fall under the purview of Sexual Harassment, or the complaint does not mean an offence of Sexual Harassment, the same will be dropped after recording the reasons thereof.
- The findings and recommendations of the Committee will be recorded and submitted to the Management for further action.
- The report of the Internal Committee (IC) shall be treated as the official inquiry report, on the basis of which an erring employee may be recommended for appropriate

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disciplinary action. In exceptional cases, if the IC concludes that a complaint was deliberately false, malicious, or frivolous, it may recommend appropriate disciplinary action against the complainant, ensuring such action is based on clear findings from the inquiry and not on mere inability to substantiate the complaint.

- The Management will take appropriate disciplinary action against the erring employee taking into consideration the recommendation of the Committee.

9. ACTION DURING PENDENCY OF AN ENQUIRY:

During the pendency of an inquiry, the Internal Committee (IC) may take appropriate interim measures to ensure the safety, well-being, and work environment of the aggrieved individual and to maintain a fair and unbiased investigation.

Such measures may include, but are not limited to:

- Allowing the aggrieved individual or the respondent to work from home.
- Granting paid leave to the aggrieved individual for up to three months, in addition to any other leave entitlement.
- Placing the respondent on unpaid leave, if deemed necessary.
- Restricting the respondent from reporting on the aggrieved individual's work performance or writing confidential reports, and assigning such responsibilities to another employee.
- In cases where the complainant is an intern, apprentice, or trainee under the supervision of the respondent, reassigning the complainant's supervision to another employee to prevent direct interaction with the respondent
- Direct the Respondent to not communicate with the Complainant in any manner including any mode of electronic communication such as text messages, emails, video/audio calls, on any social media platform or via any other mode of electronic communication.

10. WHAT ACTIONS CAN BE SUGGESTED POST INQUIRY

Where the IC finds the Respondent to be guilty of Sexual Harassment, it shall recommend any of the following actions depending on the severity, frequency and impact of the Sexual Harassment:

- Written apology
- Written warning
- Reprimand or censure
- Counselling
- Withholding of promotion
- Withholding of increment/bonus

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➤ Termination

The IC may also award compensation to the aggrieved individual. The purpose of compensation is to put the Complainant in the same position as they were had the harassment had not occurred. It is the Respondent who shall be liable to make good the financial loss suffered by the Complainant and not the employer. The Committee is empowered to recommend monetary compensation, factoring in the income and financial status of the Respondent, in the following cases:

- Any mental trauma, pain, suffering and emotional distress caused to the aggrieved individual
- Any loss in the career opportunity due to Sexual Harassment.
- Medical expenses (physical and psychiatric)

The compensation amount will be paid in a lump sum or instalments.

11. CONFIDENTIALITY:

Every person who is a part of the complaint process shall at all times keep the contents of complaint, identity of complainant, respondent and witnesses, and any information relating to conciliation, inquiry and recommendations of Committee confidential.

Company will not tolerate retaliation or victimization against anybody who identifies and raises issues relating to any form of harassment/discrimination including sexual harassment or who lodges complaints and/or participates in any related proceedings either directly with the management or through the grievance procedures in place.

Any person contravening the confidentiality clauses is subject to disciplinary action as prescribed under the Act/Code protocols.

12. PROTECTION OF COMPLAINANT AND WITNESS FROM RETALIATION

Precaution will be taken by the company to ensure that complete confidentiality is maintained, and no form of discrimination is faced by the employee who has escalated the complaint.

Retaliation against an employee who has complained of sexual harassment will attract disciplinary action.

The Company is committed to ensuring that no employee or witness who brings forward a harassment concern or testifies is subject to any form of retaliation.

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Any employee who retaliates against an employee who has reported in good faith, a sexual harassment claim, will be subject to disciplinary action, which may include dismissal. Any reprisal will be considered as a separate case of harassment. Anyone who abuses this procedure (for example, by maliciously putting an allegation knowing it to be untrue) would also be subject to disciplinary action including dismissal from service.

In the event that the Complainant or any Witness of the Complainant is being supervised by the Respondent or any of their Witnesses, then such reporting assignments will be changed to the extent possible by the Company.

The Company will not victimize or discriminate against a Complainant or Witnesses while dealing with complaints of sexual harassment.

13. MALICIOUS COMPLAINT

In case IC arrives at a conclusion that:

- Allegation against the Respondent is malicious or was made with malicious intent.
- Complaint was made with the motive of maligning the Respondent/tarnishing their image.
- Complaint was made to settle personal/professional scores.
- The Complainant has made the complaint knowing it to be false.
- Has produced a forged or misleading document.

IC shall recommend strict action against the Complainant. IC may recommend the Firm to take an action that would have been applicable to the Respondent if the complaint had been genuine. In this regard, IC may recommend any of the actions specified above (As applicable). A mere inability to substantiate a complaint or provide adequate proof need not attract action against the Aggrieved Individual under this section.

14. OTHER POINTS TO BE CONSIDERED:

The Committee may recommend to the Management vide its findings and report appropriate disciplinary action.

Where sexual harassment occurs as a result of an act of omission by any third party or outsider, the Company shall take all steps necessary and reasonable to assist the affected person in terms of support and take immediate preventive/corrective action.

The Committee shall analyze and put up a report on complaints at the end of each quarter to the Chairperson and Chief Managing Director/Board of Directors.

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If the Complainant desires to take criminal action against the Respondent, there shall be no objection by the IC and the company. In such an event, the company will attempt to provide all reasonable assistance to the Complainant. In case the Committee finds the degree of offence coverable under the Indian Penal Code, then this fact shall be mentioned in its report and the Management may choose to make a Police Complaint after consultation with aggrieved woman. The company prohibits any form of retaliation against anyone who has raised a complaint of sexual harassment or has cooperated in any inquiry involving a complaint of sexual harassment.

If any party wanted to make an appeal on recommendations, they would need to appeal within 90 days of recommendations.

15. ROLE OF AN EMPLOYEE

Each employee will maintain an appropriate standard of conduct with his/her colleagues.

Each employee will be personally responsible for adherence to the laid down code of conduct in his/her range of work.

The employee will ensure that she/he does not get involved in any inappropriate act, conduct, conversation, or dealings in his/her official, private, and personal spheres.

It is the responsibility of every employee to communicate/report any unacceptable behavior of the kind mentioned in the definition to sexual harassment, initiated towards self or colleagues.

16. MANAGEMENT AND TEAM MANAGER'S RESPONSIBILITIES

The team manager should:

- Create and maintain a working environment in which all employees feel safe and respected.
- Be alerted to observe any inappropriate conduct or comments passed.
- Refer to the committee in accordance with this policy, when instances of sexual harassment which occur within the workplace are brought to their attention.
- Discuss and display the consequences of sexual harassment at a conspicuous place of the workplace.
- Assist in securing the attendance of the respondent.
- Make any such information available to the committee.
- Provide assistance to the employees if they wish to file a complaint under the Indian Penal Code.

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The Company may take appropriate actions in accordance with law by filing complaints with the right authorities where any conduct that amounts to a specific offense under the Indian Penal Code or any other such penal law that is in force at the time.

In the event that any visitor(s) engages in sexual harassment or if the company receives complaints from their employees or consultants, the company will assist in filing complaints with the appropriate authorities under the applicable laws enforced and the company shall also assist such employees or consultants in distress,

The company encourages individuals facing sexual harassment to promptly notify the offender that such act is unwelcomed, and it creates a hostile work environment for themselves and others as well. It is also recognized that the disparity of power between the offender and the victim can be a hindrance in notifying such offender. and might make it sometimes impossible to do so. In such an event, the individual may directly contact the members of the IC using the contact information on the notice board to notify such behavior.

The company has a zero tolerance towards Sexual harassment, and it will be treated as a major misconduct that is dishonorable, detrimental, and discreditable to the reputation of the company which can lead to very severe consequences and actions that also include the dismissal from service.

The company will conduct regular training and awareness workshops on the POSH Act for all employees, with a minimum of one session per year.

The Management will provide all necessary assistance for the purpose of ensuring full, effective, and speedy implementation of this policy.



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17. ANNEXURE 1

Details of the members of the IC:

POSH committee details of Bangalore

Sl. No	Name	Designation	Role in IC	Mail ID
1	K.Jeevana Rao	AVP.CSR & Sustainability	Presiding officer	ic@sumadhuragroup.com
2	Syeda Uzma Anees	DGM - Marketing	Member	uzma@sumadhuragroup.com
3	Vhs Sastry	Senior General Manager - CRM	Member	sastry@sumadhuragroup.com
4	Ashwin R Anneppanavar	Senior General Manager - Legal	Member	ashwin.a@sumadhuragroup.com
5	Spoorthi	Asst.manager L&D	Member	Spoorthi.m@sumadhuragroup.com
6	Dr.Shashi kad	CEO. Sage Sustainability	External Member	shashi@sagesustainability.in

Posh Committee details of Hyderabad

Sl. No	Name	Designation	Role in IC	Mail ID
1	K. Jeevana Rao	AVP.CSR & Sustainability	Presiding officer	ic@sumadhuragroup.com
2	Arun. K Gattu	VP S&M	Member	Arun.k@sumadhuragroup.com
3	V. Padma Latha	Senior Manager. Admin	Member	padma@enlivengroup.com
4	Dr. Shabnam Priyadarshini	Chairperson - Human Resource Management, IMT.Hyd.	External Member	shabnamp@imthyderabad.edu.in

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18. ANNEXURE 2

Instance of sexual harassment and perceptions

1. Quid Pro Quo Harassment (*"This for That"*)

When employment benefits (promotion, raise, project assignment, confirmation, etc.) are made conditional upon sexual favors.

Examples:

- A manager asking an employee for a date in return for better appraisals.
- Suggesting sexual favors in exchange for job security or advancement.

2. Hostile Work Environment

Any unwelcome conduct of a sexual nature that creates an intimidating, offensive, or unsafe workplace.

Examples:

- Repeated sexually colored jokes or comments.
- Unwelcome physical proximity or touching.
- Displaying sexually explicit images or videos at work.
- Persistent unwanted messages or calls outside of work.

3. Verbal & Non-Verbal Harassment

- Suggestive remarks, innuendos, or double-meaning jokes.
- Comments on physical appearance or personal life.
- Staring, leering, or inappropriate gestures.
- Whistling, making sounds, or body language suggesting sexual undertones.

4. Physical Harassment

- Unwanted touching, patting, pinching, or brushing against the body.
- Forcible physical advances.
- Blocking someone's path, cornering, or invading personal space.

5. Digital / Virtual Harassment (*increasingly relevant today*)

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- Sending unsolicited sexually explicit texts, images, or videos.
- Sharing offensive memes or forwards in official groups.
- Online stalking or repeated unwanted messages on social platforms.
- Recording calls/meetings without consent for misuse.

6. Perceptions of Sexual Harassment

While the above are **legal instances**, perception plays a **huge role** in POSH. An action that seems “harmless” or “casual” to one person may feel **offensive, humiliating, or threatening** to another.

- Intent vs. Impact: What matters is the impact on the receiver, not the intent of the sender.
- Subjectivity: A comment like “You look hot today” may be perceived differently depending on context, relationship, and frequency.
- Cultural Differences: Behaviors acceptable in informal circles (like hugging or nicknames) may be inappropriate in professional settings.



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19. ANNEXURE 3

This table provides a quick reference of important acronyms and terms used under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 – commonly referred to as the POSH Act.

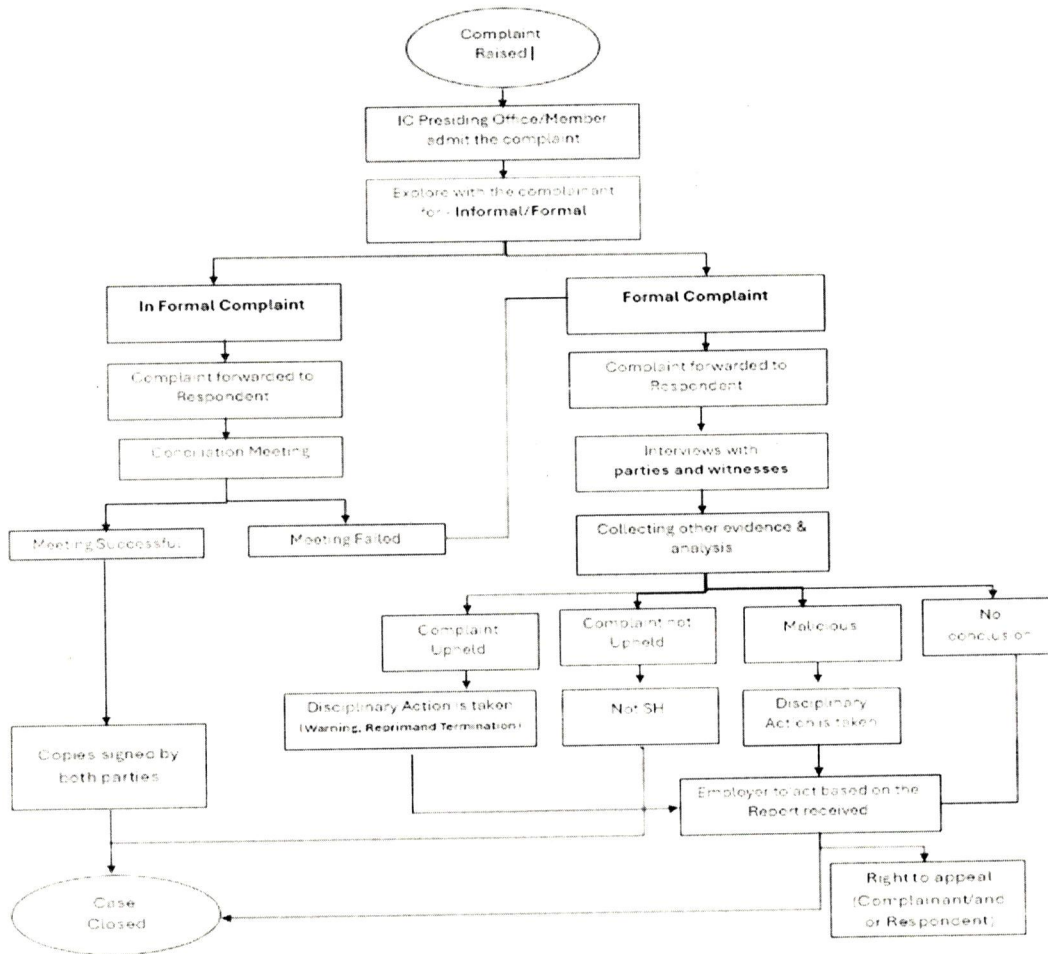
Acronym	Full Form	Meaning / Context
POSH	Prevention of Sexual Harassment	The law to prevent and redress sexual harassment at workplace.
IC	Internal Committee	Mandatory committee at every workplace with 10+ employees to address complaints of sexual harassment.
LCC	Local Complaints Committee	Committee formed at district level to address complaints from workplaces with <10 employees or if the complaint is against the employer.
DO	Designated Officer	Person authorized by the employer to receive IC's report and take appropriate action.
AW	Aggrieved Woman	Any woman, of any age, employed or visiting a workplace, who alleges to have been subjected to sexual harassment.
Respondent	-	The person against whom the complaint of sexual harassment is made.
IR	Inquiry Report	The written report submitted by the IC/LCC to the employer/DO within 10 days of completing the inquiry.
Conciliation	-	Alternate resolution mechanism (if requested by the aggrieved woman) before inquiry begins, without monetary settlement.
Employer	-	The person responsible for management, supervision, and control of the workplace (includes Directors, Occupier, Head of Department, etc.).
Third Party Harassment	-	Sexual harassment by outsiders/visitors at workplace; employer must take preventive/responsive steps.

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20. ANNEXURE 4

This figure provides a quick reference of the process flow to raise a POSH complaint under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013.



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21. ANNEXURE 5

Below is the Form for submitting a complaint under the POSH Act, 2013

POSH Complaint Form

Name of the Complainant:

Designation / Department:

Contact Information (Phone/Email):

Date of Complaint Submission: 07-05-2025

Date of Incident / Date of Last Incident (if multiple):

Name of the Respondent:

Designation:

Department :/ Identification of Respondent:

Name and Contact Details of Witnesses (if any):

Documents Attached (if any): [Mention if any CCTV footage, screen shots, or written statements are provided]

Details of the Incident(s):

Preferred Mode of Redressal (Please tick one):

☐ Formal Inquiry (Investigation by the Internal Committee as per POSH Act)

☐ Informal Resolution (Conciliation with consent before formal inquiry, as per Section 10 of POSH Act)

*Note: No monetary settlement shall be made as a basis of conciliation. *

Declaration by the Complainant:

I, the undersigned, declare that the information provided above is true to the best of my knowledge and belief. I understand that this complaint will be kept confidential and will be used solely for the purposes of redressal under the POSH Act, 2013. I am aware that knowingly filing a false complaint is an offence under Section 14 of the POSH Act.

Signature of the Complainant:

Date:

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22. ANNEXURE 6

Below is the formal enquiry form used by the Internal committee (IC) to examine the Statement/Complainant/ Respondent/Witness

FORMAL ENQUIRY FORM

Date:
Time:
Venue:

1. Witness/Complainant/Respondent Details

Name of Witness/Complainant/Respondent:
Designation:
Department:
Contact No:
Email:

2. IC Panel Details

Presiding Officer: [Name]
Members Present: [Names of other IC members]

3. Statement of Purpose

This enquiry is being conducted by the Internal Committee under the provisions of POSH Act, 2013 to examine facts and gather evidence regarding the complaint received on [Date of Complaint].

4. Oath/Affirmation by the Witness/Complainant/Respondent

"I, [Witness Name], solemnly affirm that the statements I make today will be true to the best of my knowledge and belief, and I understand that this enquiry is a formal process."

Signature of Witness/Complainant/Respondent: _____

Date: _____

5. Examination of Witness

Q1: [Question by IC]

A1: [Answer]

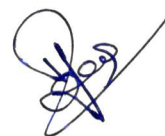
Q2: [Question by IC]

A2: [Answer]

[Continue as required]

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6. Additional Observations (if any)

[Any remarks by the IC, unusual behavior, refusal to answer, etc.]

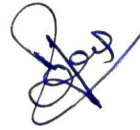
7. Conclusion of Statement

The witness/Complainant/Respondent is informed that their statement has been recorded accurately and may be referred to during the course of the enquiry.

Signature of Witness/Complainant/Respondent: _____

Signature of IC Presiding Officer: _____

Date: _____



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