

# **PREVENTION OF SEXUAL HARASSMENT OF WOMEN AT WORK PLACE { P O S H } POLICY**

( As approved and adopted by the Executive Committee on 18<sup>th</sup> day of April, 2024 )

MARI is committed to provide secured atmosphere to all employees at their place of work. MARI recognizes the problem generally the feminine gender staff are prone to the world over and India is no exception. With a view to protect the modesty of all the female staff members, MARI considers it imperative to lay down clear cut and transparent policy with an objective to Prevent Sexual Harassment ( P O S H ) of Women( including affiliates ) at Work place/s etc.in all conceivable forms. This is in addition to the existing policies relating to Anti-Sexual Harassment Policy ( ASH) and the Policy relating to the **Protection** of Children from Sexual Offences (POCSO) that MARI is already subscribed to

## **I. Scope**

The Prevention of Sexual Harassment of Women at Workplace is applicable: -

- a) To all employees and women consultants (full time & part-time) of Modern Architects for Rural India (MARI), which as per section 2 (f) of the Act, 2013, means any person who has been employed as regular, temporary, ad hoc or on daily wage basis either directly / through an agent / contractor (with/ without the knowledge of the principal employer ; with or without remuneration / voluntary ; under express / implied terms of employment and shall include contract worker / probationer / apprentice / Executive Trainees / Management Trainees, etc. hereinafter defined as "Employees /Consultants".
- b) To women employers, which as per section 2 (f) of the Act, shall mean any person authorized / designated to be the employer within the means of the Act by MARI
- c) On office premises and all areas which can be termed as notional extension of women employer's premises. It also includes any place visited by the women employee arising out of or during the course of employment including field areas, field offices and transportation provided by the employer for undertaking such journey. The incident is covered during / after office hours.
- d) To all the Visitors, Vendors, Contractors, Suppliers, Service Providers associated with MARI and visiting any premises of the organisation or whose premises, MARI's women employees visit during the course of business. The Internal Complaints Committee ( ICC ) is required to enquire all Complaints

made under the provisions of the Act and as per these guidelines in just and fair manner and submit their report to the respective Employer (s) or Management, as the case may be. It is pertinent to mention that the Employer or Management only has the right to punish guilty under service rules as per the recommendation by ICC.

- e) Further, in all the Agreements with Sub-recipients, MARI shall seek the Sub-Recipient to adhere to the safeguarding policy ( reporting incidents of suspicion etc. ) through an addendum ( wherever applicable and as the case may be ). MARI shall also seek and ensure that specific terms and conditions relating to Safeguarding Policies are incorporated in all the Agreements with the Suppliers and Service Providers, wherever possible / feasible.

### **The Prevention of Sexual Harassment ( POSH ) of Women at Workplace Act, 2013 envisages**

- Prohibition
- Prevention
- Redressal of Sexual Harassment cases

### **The following Charter / Policy is laid down for compliance by MARI.**

- The main objective of the POSH Policy is to ensure that no female staff member including managerial personnel is harassed by any other person of the opposite sex, for the reason that the former (victim) has not cooperated with the latter (accused) in fulfilling the latter's sexual desires of whatsoever nature and expressed in whatsoever mode or whether or not, using the employment status of the victim as a mode of inducement or threat.
- The organization and management of MARI shall at all times be totally committed to the POSH Policy
- The Management of MARI shall at all times ensure that the provisions of the Sexual Harassment of Women at Work Place( Prevention, Prohibition and Redressal ) Act, 2013 ( POSH Act ) are complied and not violated by any of its staff and affiliates. Also suitable necessary/corrective and feasible / remedial action would be initiated, when such violation is noticed / committed by any of the persons, with whom MARI is associated viz. Professionals/Vendors/Service Providers etc..
- The Management shall implement the POSH Policy in a most transparent and effective manner and mode.
- The commitment of the organization to the POSH Policy shall be expressly mentioned in the appointment letters issued to all employees at the time of their joining the service.

- ✓ MARI shall conduct proper orientation to its staff members ( at the time of their appointment and thereafter at such other frequent periods ) with respect to the various provisions contained in this Policy as also the compliance expected from them and the consequences flowing from the non-compliance of the Policy. The employees shall be furnished with soft copies of all the policies at the time of their appointment ( with due acknowledgement and undertaking to comply with the provisions of the policies ) and at such other times that the policies are amended or annually, wherever possible or feasible. MARI shall also cause the Policy to be uploaded on its website
- ✓ MARI shall cause Annual Report to be filed with the District Officer having appropriate and relevant jurisdiction.

DEFINITIONS : the Definition of various terms in the Policy, are to be treated as **inclusive and not exclusive.**

**The term "Sexual Harassment" is defined under various Acts applicable in India. The same are mentioned hereinbelow**

**1) Sexual Harassment** is defined under POSH Act, 2013, to include unwelcome acts such as physical contact and sexual advances, a demand or request for sexual favours, making sexually coloured remarks, showing pornography, and any other unwelcome physical, verbal, or non-verbal conduct of a sexual nature.

**2) Sexual Harassment** is defined U/s.354A of the Indian Penal Code as :

- a. Physical contact and advances involving unwelcome & explicit sexual outturesor
- b. A demand or request for sexual favours ; or
- c. Showing pornography against the will of a woman ; or
- d. Making sexually coloured remarks, shall be guilty of the offence of sexual harassment.

Another related offence is defined under Section 354 of Indian Penal Code, duly prohibiting any assault or criminal force to woman with an intent to outrage her modesty or knowing it to be likely that he will thereby outrage her modesty

In addition to the above definition of Sexual Harassment under the above two Acts, other general definitions are also considered and stated below :

**3) The Words "Sexual Harassment"** mean, imply and represent any act or series of acts of harassment(including but not limited to physical, mental and verbal abuse and / or all forms of exploitation) committed at the workplace and / or outside [whether during and / or outside the working hours and / or whether at the working place and / or outside] by any person of opposite sex against the female staff

member ( including Staff & Affiliates ); program participants and community members,whethergenerally being in a commanding or higher position (by designation and / or through emoluments, or being in proximity to or in a position to influence any higher power of authority that may be)or otherwise ( e.g., physical stature ),with an intention to derive or seek sexual favour or satisfaction ( for himself and / or others )through derogatory remarks or through depiction of sexual matter in vulgarity, whether relating to the victim or any other person; whether through physical contact or through verbal statements (in whatever mode, including electronic mode);whether through inducements or threats or bothandagainst the consent and / or desire of the victim ; whether resulting in mental agony or not,whichconstituteobjectionable and / or unlawful behaviour by the accused and simultaneous violation of the rights of privacy of the subject person(victim) and includes ( for eg., ) un-wanted and inappropriate touching, making sexual demand, implying that such a thing may be a condition for continued employment etc.

**Generally, two types of Sexual harassment at workplace are observed commonly**

\*Quid Pro Quo { literally 'this for that ( in exchange)' }

>>Implied or explicit promise of preferential / detrimental treatment in employment

>>Implied or express threat about his / her present or future employment status

\*Hostile Work Environment

>>Creating a hostile, intimidating or an offensive work environment

>>Humiliating treatment likely to affect his / her mental health or safety

4) The words "**Victim**" means and include specifically only the female employees Affiliates etc. as defined hereinabove, against whom the harassment was practised.

5) The term "**Accused**" means and includes persons of opposite sex to the Female employees as indicated in clause (4) supra and includes any person abetting the above crime or shielding or providing shelter and / or support to the main accused.

6) The word "**Complaint**" means and include news, information etc relating to sexual harassment received from whosoever (including any victim/survivor, whistle blower etc.) and in whatsoever manner and mode, including verbal

7) The phrase "**Principles of Natural Justice**" mean and include providing equal opportunity to the victim and the accused, to present their side of the arguments. This also entails the members of the Special Committee to act or function in non-partisan manner or without any prejudice and in a transparent manner.

- ❖ The management shall take all reasonable steps to ensure that all the employees and affiliates are aware of the POSH Policy of the organization. The management would include a clause in the employee's appointment letter, cautioning about the violation of POSH Policy and its ramifications. Also the management would consider subjecting the employees to periodical, reasonable and sufficient orientation about the above policy.
- ❖ The management represented by the Executive Director or Chief Functionary, by whatever designation named, shall immediately respond or attend to any news, information, complaint or allegation relating to any kind of sexual harassment indulged by any management personnel or any staff member, by intimating / forwarding the same to the members of the Internal Complaints Committee ( ICC ) constituted for the purpose. The management may suo moto consider any news or information received from whatever source and take up the issue for consideration by the Internal Complaints Committee ( ICC ) after intimating to the Executive Committee.
- ❖ Immediately upon the receipt of any news, information or complaint ( in any of the various modes, including but not limited to various means of reporting viz., complaint box, dedicated e-mail in box, verbal reporting etc. ) the management shall decide about the nature of such news, information and / or complaint and its gravity. The complaints received at the Head Office are entered in the Register maintained thereat and the Executive Director / Chief Functionary shall be the Focal Point ( or any of the authorised person of the Management ) and Custodian of the Register, whereas in Project areas ( office/s ), the respective Program Managers shall be the Focal Point Persons and shall be the Custodian/s of the Complaint Register/s, who shall in turn report to the Executive Director / Chief Functionary ( or any of the authorised person of the Management ). All the MARI Personnel, besides statutory authorities and other stake holders, may make a requisition and have access to the above Register. A Preliminary enquiry would be conducted by the Management ( whereat the victim as well as the accused shall be present to submit their respective versions ), before deciding upon the future course of action viz., whether to adjudicate through its own Internal Complaints Committee ( ICC ) or hand over the case to Police etc., where the offence is serious and is attracted by the provisions of the Indian Penal Code. Thus, where the complaint is of a criminal nature, viz., where the modesty of the victim ( female staff member ) is outraged or the victim is raped ( which do not strictly be an ipso facto case of sexual harassment, albeit being the possible culmination of such act or process ), then such cases would be directly handed over or referred to the Police, at the earliest opportune time without any lapse of time, so as to avoid any lapse or negligence on the management

side. Also, where the complainant is desirous that the police deal with her complaint, the management shall consider referring the case to the Police, if the same is not prejudicial to the interests of the organization or its reputation. MARI shall provide all the requisite assistance to the victim in approaching the Law and Order Authorities and ensuring that the justice is rendered to the victim. Also, the Management of MARI may consider granting financial assistance to the victim, having regard to the facts and circumstances of each case. Thus, where the case pertains to non-police case and / or the complainant is willing to place the same before the management for consideration, the same would be taken up by the Management for consideration through the Internal Complaints Committee. Also, in all non-criminal cases, the management has the final authority to seek the submissions of both the victim and the accused before the Internal Complaints Committee

- ❖ Where the complaint is about an offence covered under the Sub-clauses (a) to (d) of Clause (1) of Section 354A of the Indian Penal Code, then such cases would be directly handed over or referred to the Police at the earliest opportune time without any undue lapse of time, so as to avoid any default or negligence from the management side. It is stated for information purposes that the punishment for the offence committed under clauses (a) to (c) of Section 354A is three years rigorous imprisonment or fine or both, while the punishment for the offence committed under clause (d) of Section 354A is one year imprisonment of either description or fine or both. An offence under Section 354 is punishable with imprisonment of either description for a period of not less than one year and nor more than one year or fine or both. Also the accused shall be punishable in accordance with the provisions of Prevention of Sexual Harassment of Women at Work Place ( POSH ) Act, 2013.

The Management of MARI shall evolve and constitute a Reporting Mechanism ( in the mode and manner detailed here in above ) and ensure that the mode of complaint making is transparent ; well documented ; principles of natural justice are adhered to in letter and spirit and most importantly, the complainant and all the other persons involved in the process of reporting ; carrying on investigation ; involved in giving evidence etc. are fully protected physically and otherwise { by providing such persons and the related persons ( more particularly the survivors and other affected persons ) with financial, medical, psycho-social counselling, legal referral support } and that no retaliatory action ( in the form of any adverse employment action or harassment, as regards any staff member or any threatening act towards any outsider ) is taken. MARI shall also be obligated to maintain full confidentiality about the allegations, survivor / victim, reporter, witnesses and subject of complaint, as also the contents of any Report, to the extent it is feasible and not otherwise obligated to disclose to entities like donors, statutory, legal authorities etc.

MARI shall encourage the employees, victims or any other person ( including well wishers, Professionals, NGO organizations, etc.) to make any suggestion / complaint in any of the following modes :

Deposit the Letter ( written communication ) in the Suggestion / Complaint box provided at the Administrative office / field office of MARI

Letter (written Communication) posted through courier or regular or registered post to the communication address of MARI

email sent to dedicated email id :admin@mari-india.org / mariwgl@gmail.com

( phone / hotline ) ( 040 – 48543830 )

The Complaints received as above shall forthwith be entered in the Register and action initiated. Full confidentiality shall be maintained as regards the contents of the complaint and the Report /findings ; the name of the complainant and the accused etc. to the extent possible / feasible, so that the same is not prejudicial to the interests of various parties / stakeholders ;

- ❖ MARI PERSONNEL of all genders shall be obligated to report any concerns or suspicions of any forms of harassment, abuse and exploitation described above involving ORGANIZATION staff, board members, affiliates, partners, program participants, suppliers, service providers or aid workers, associated with another organization, through any conceived mode of channel of communication. MARI shall ensure communication is systematic throughout project planning ; and community-based feedback, complaints and response mechanisms are available.

The Executive Director or Chief Functionary shall, having regard to the mandatory provisions of the Sexual Harassment of Women at Workplace Act, 2013, constitute an Internal Complaints Committee (hereinafter referred to as "I C C" ) in full legal compliance of the POSH Act, 2013.

#### **A. Composition of the Internal Complaints Committee :**

The ICC ( with not less than four members ) will be composed of the following members:

- a) Chairperson / Presiding officer / Convener: Shall be a woman working at senior level as employee ; if not available, then nominated from another office/units/ department/ workplace of the same employer
- b) Members (minimum 02): from amongst employees committed to the cause of women/having legal knowledge/experience in social work
- c) External member/s (minimum 01): from civil society or legal background, with the following attributes:

- i. Demonstrated knowledge, skill and capacity in dealing with workplace sexual harassment issues/complaints;
- ii. Familiarity with labour, service, civil or criminal law.

The external member/s shall be paid for their services on the ICC as prescribed.

- d) Where the office or administrative units of a workplace are located in different places, division or sub-division, the ICC shall have a representative from such place.

## **B. Nature and Term of Membership**

- a) Any member (except the External member/s) of the ICC shall be an employee of MARI.
- b) More than half of the ICC members shall be women employees
- c) The term of the office of each of the ICC shall be two years
- d) Membership to ICC shall be restricted to two terms
- e) In case of any vacancy arising due to resignation or termination of a member from ICC, the vacancy shall be filled immediately through a decision of MARI management.
- f) The names of persons, who are in the ICC, shall be communicated to all concerned. Similarly, any other changes to the ICC shall be communicated to all staff.
- g) The members of the ICC and focal persons of each Project Office are nominated by the employer.

## **C. Membership of the ICC at MARI**

The present ICC ( for F.Y. : 2024-25) consists of the following seven members:

- 1) Ms.P.Poornachandrika ( Convenor - Employee )
- 2) Ms.V.Anitha ( Member - Employee )
- 3) Ms.GarshaAmrapali( Member – Employee )
- 4) Ms.NeetuPravalika ( Focal Point Member – Employee )
- 5) Mr.UpendraIskala ( Focal Point Member – Employee )
- 6) Mr.Ragi Krishna Murthy ( Focal Point Member – Employee )
- 7) Ms.K.ShivaKumari ( Outside Professional Representative )

MARI (as and when required) shall increase the membership of the ICC to ensure equal representation from all types of employee characteristic (place, work type, designation level etc)

## **D. Meetings of the ICC**

- a) The ICC of MARI shall meet at least four times in an year (at least one meeting every quarter on an average )

- b) Special meetings may be convened at any time depending on the need and necessity.
- c) The quorum for any meeting of the Complaints Committee will be the presence of half or more of the total ICC members, ensuring the presence of at least one woman-member.
- d) If there is no quorum for a meeting, the meeting shall be adjourned for not more than seven days, with such meeting scheduled preferably on a holiday.
- e) At a subsequent meeting, if there is still no quorum, the meeting shall be conducted by those who are present and the proceedings of such a meeting shall be valid and will not be challenged on the ground of absence of quorum, provided there is at least one woman-member among those present.
- f) In case a member of the ICC remains absent without permission of the Convener or other members for three consecutive meetings, such person/s would be deemed to have neglected duties, which go with his/ her employment, and the matter would be recommended to be dealt with by the MARI management accordingly.
- g) The minutes of every meeting will be recorded by the Management, under the leadership of Convener.

#### **E. Responsibilities of the ICC**

The responsibilities of the ICC at MARI shall be as follows:

- a) Know the Act, Policy and/or relevant Service Rules
- b) Ensuring effective implementation of the ICC guidelines of MARI
- c) To spread awareness on the Act amongst all stakeholders of MARI
- d) At the end of every calendar year details of complaints received and redressed shall be compiled and reported in the Annual Report of MARI
- e) Workshops and meetings would be organized / convened for all the women employees by the ICC on a periodical basis in order to do the following:
  - i. To sensitize employees about their right to have safe and healthy work environment
  - ii. To spread awareness about same either by way of publication, advertisement or by convening meetings
  - iii. To discuss with women employees on general issues involving challenges faced by them at work place, if any and workshops on various aspects of the Act
  - iv. Increase awareness amongst employees and overcome the hesitation and discomfort in discussing issues involving Sexual Harassment at work place by convening meetings so that employees can open up and share their views and ideas;
  - v. The ICC would also assist Complainants if required to file a Complaint
  - vi. Maintain records of all sexual harassment cases and findings

- vii. Display various legal provisions for women who under goes sexual harassment at workplace

#### **F. Resignation of any member**

Member/s may resign from the Committee, however they are expected to explain the reasons for resignation and the resignation should be agreed by more than half of the ICC members.

#### **G. Disqualification of the Presiding Officer and members**

- a) A member shall be disqualified from being appointed, elected, nominated or designated, or from being continued as a member of the ICC, in case of allegations concerning sexual harassment, moral turpitude or serious criminal charges are initiated against him/her or if he/she is found guilty of such charges.
- b) Similarly, in the event that one of the members of the ICC is a victim of sexual harassment he/she will be entitled to seek recuse from the proceedings of that particular case on the grounds of conflict of interest

The Internal Complaints Committee ( ICC ) shall elect a Chairman to preside over all the meetings till the disposal of any matter on hand and shall meet so often as is required, depending upon the urgency and importance of the matter and the convenience of the members of the committee

The Internal Complaints Committee shall follow principles of natural justice in letter and spirit. It shall provide equal opportunity to the victim and the accused.

All the proceedings of the Internal Complaints Committee shall be recorded / documented through minutes. All the decisions arising out of the proceedings at each of its meeting shall be formalized through resolutions passed with simple majority

The Internal Complaints Committee may resolve ( if so necessitated or considered appropriate, having regard to the given circumstances ) that the organization may seek legal counsel for the issues on hand and / or provide legal support through indenting of services of any legal professional to the victim and such total expenditure relating to the case shall be borne by the Organization.

The Internal Complaints Committee shall be guided to decision by the majority of the committee members. If necessary, secret ballot would be held to ensure free expression of opinion of the committee members, in arriving at a decision.

## **II. General responsibilities of Employer**

The employer has the following legal responsibilities to fulfil:

- a) Effectively communicate the POSH Policy that prohibits unwelcome behaviour that constitutes workplace sexual harassment and provides a detailed framework for prevention and redress processes.
- b) Support and Coordinate with ICC to carry out awareness and orientation for all employees.
- c) Create forums for dialogue i.e., Panchayati Raj Institutions, Gram Sabhas, Women's Groups, Urban Local Bodies or like bodies, as appropriate.
- d) Ensure capacity and skill building of the ICC members.
- e) Widely publicize names and contact details of ICC.

### **III. Grievance procedure**

- 1 Any female employee of MARI shall have a right to lodge a complaint concerning sexual harassment against fellow employee or representative of MARI or an outsider with any of the members of the ICC. Such a complaint may be made in writing. If the complaint is oral, then the member to whom the complaint is made shall prepare a detailed written complaint, as expeditiously as possible and submit the same to the ICC.
- 2 Full confidentiality shall be maintained with regard to the complainant and her written complaints for as long a time as necessary to ensure / induce a feeling of confidence in her.
- 3 The ICC shall nominate two or three persons from amongst members and also include one person from staff which will be called the Inquiry Committee ( Sub-Committee ) for initially proceeding with the Complaint. The ICC shall ensure that at least two women are part of the Inquiry Committee.
- 4 No person against whom the complaint is made, shall be part of the Inquiry Committee.
- 5 In case the Inquiry Committee decides to proceed with the complaint, the accused shall be given an opportunity to explain within one week why he should not be punished for the act of sexual harassment on his part.
- 6 The punishment shall be imposed according to the nature of guilt.
- 7 The Inquiry Committee shall prepare a charge sheet containing specific charges, the statement of allegation by the complainant and the explanation of the accused. Copies of the same shall be sent to both the complainant and the accused by registered post within three days of the Inquiry Committee having decided to conduct the inquiry.
- 8 The Inquiry Committee shall see to it that that every reasonable opportunity is extended to the complainant and to the accused, for putting forward their case.
- 9 The complainant shall have the right to lead evidence and to cross-examine witnesses who have been examined on behalf of the accused.

- 10 The accused shall have the right to be heard in person and lead evidence. He shall also have the right to cross-examine witnesses examined on behalf of the complainant.
- 11 Sufficient opportunities shall be given to examine all witnesses notified by both the parties.
- 12 All the proceedings of the Inquiry Committee will be recorded and both parties in token of authenticity shall endorse the same together with the statement of witnesses thereof. In case of refusal to endorse the same by either party, endorsement to the effect may be made by the Convener of the ICC.
- 13 The inquiry shall be completed within a period of 90 days from the date on which the show-cause notice is given to the accused.

### **REDRESSAL / PUNISHMENT**

The Management AS RECOMMENDED BY THE INTERNAL COMPLAINTS COMMITTEE ( ICC ) would award the punishment, depending on the severity of the offence or violation of the Policy. The various forms of punishment include ( but not limited to ) verbal warnings, written warnings, mandatory training or counselling, suspension or termination of employment. Serious misconduct such as sexual abuse and exploitation as well as persistent and severe forms of harassment would justify immediate termination, in line with local labour law ( after giving due opportunity or affording legal counsel to defend the accused's case )

Pursuant to the verdict of the Internal Complaints Committee( ICC ), the accused if found guilty, would be removed from service forthwith or placed under suspension, if further investigation is considered necessary. Likewise, the alleged victim shall be liable to be removed from service, if her complaint was found to be frivolous, vexatious, ill-motivated, without substance or untenable. This is in addition to any punishment that may be awarded to the accused under the Indian Penal Code and the Prevention of Sexual Harassment of Women Workplace Act, 2013. The Internal Complaints Committee of MARI shall exercise all powers with which it may be bestowed by virtue of any Governing Act or its Bye Laws. The question of awarding damages to the victim or levying fine or penalty to the accused shall not be within the purview of the Internal Complaints Committee, as the same is not a judicial or quasi-judicial body and such relief could be obtained through further proceedings before such other appropriate authorities. It may however award financial help to the victim, if the same is merited or considered necessary and appropriate.

- ✓ **CAVEAT** : Under no circumstances, would any of MARI's staff assess or investigate an allegation or a reported allegation on its own, outside of standard reported protocols. The Management of MARI shall follow-up and investigate all

safeguarding reports according to its investigation procedure and legal and statutory obligations.

The provisions of any Governing Act relating to any contents mentioned hereinabove ( to the extent that the provisions of this Policy are in conflict with such provisions of the Governing Act ) shall have overriding effect and this Policy shall be deemed to have contained those governing provisions or this Policy would be deemed to have been amended to that extent, with the result that such incoherent provisions in this Policy would be deemed to have never been included in this Policy, having regard to the Principle of Severability. To elucidate further, where any of the words / provisions of this Policy are not in conformity with the words / provisions provided in any Government Act/s, like Indian Penal Code and / or Prevention of Sexual Harassment of Women at Workplace Act, 2013, then the meaning of the words / provisions contained in the Indian Penal Code and / or Prevention of sexual Harassment of Women at Workplace Act, 2013, shall have overriding effect over the words / provisions of this Policy. Further, the various terms defined here in above( whenever / wherever found deficient ) shall be deemed to convey and meet the full text and meaning thereof as envisaged by any International / National Institution or Governing Body, dealing with such subject, wherever so expressly and to the extent required

Notwithstanding any of the provisions contained in this Policy, where any Donor requires any furthermore aspects or provisions and / or any of the existing provisions to be amended and be considered as Safeguarding Provisions to be adhered by MARI, then in all such instances, MARI shall adhere to such additional provisions or deemed ( amended ) provisions, as though the same were originally contained in this Policy or in the alternative or effect amendments to this Policy, as may be considered necessary and feasible, having regard to the nature or importance of such provisions / aspects ; tenure of the Project ; volume of the Grant etc.

The management may review the contents of this policy from time to time and cause amendments, in case the same are necessitated and found to be in the interests of the Organization.

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