

SFC RESEARCH FOUNDATION CIN – U88900DL2023NPL419116 A-16, First Floor, Qutab Institutional Area Aruna Asaf Ali Marg, New Delhi 110067

Policy on Prevention of Sexual Harassment at Workplace at SFC Research Foundation ("SFC" or "Foundation")

A-16, First Floor, Qutab Institutional Area Aruna Asaf Ali Marg, New Delhi 110067

I. POLICY OVERVIEW

a. SFC Research Foundation (hereinafter "SFC" or "Foundation") is committed to fostering a workplace environment built on respect, dignity, and professional excellence. We maintain a zero-tolerance stance toward sexual harassment in any form and are dedicated to ensuring all employees can perform their duties free from discrimination, bias, or unwelcome conduct.

b. Legal Framework

This Policy on Prevention of Sexual Harassment ("**POSH Policy**" or "**Policy**") is developed in accordance with the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, and its accompanying Rules ("**POSH Act**" and "**POSH Rules**").

c. Gender-Neutral Approach

- i. Notwithstanding the POSH Act's specific focus on protecting women from sexual harassment, the Foundation firmly believes that every employee, irrespective of their gender identity, has the fundamental right to work in an environment that is secure from verbal or physical abuse and unsolicited or unwelcome sexual advances or conduct.
- ii. In advancement of this principle, the Foundation has implemented this Policy with a comprehensive gender-neutral framework. The Foundation commits to providing effective redressal mechanisms against sexual harassment for all employees, regardless of their gender, and to implement stringent disciplinary measures as outlined in this Policy against any individuals who engage in perpetrating any form of sexual harassment, irrespective of the perpetrator's gender identity.

II. POLICY SCOPE AND APPLICABILITY

- **a.** This Policy establishes comprehensive guidelines for preventing and addressing sexual harassment within workplace environments (as specifically defined in subsequent sections), and extends its applicability to all employees (as defined in following sections) who are associated with the Foundation's operations throughout India.
- **b.** It is essential to clarify that while this Policy adopts a gender-neutral methodology in addressing sexual harassment complaints within the workplace, the POSH Act and POSH Rules establish statutory frameworks **specifically** designed to address sexual harassment complaints initiated by women. Keeping that in mind, this Policy incorporates specific references to guidelines that are **exclusively** applicable to women employees and complainants, as and when necessary, in accordance with the provisions established under the POSH Act and POSH Rules. These specific guidelines shall not extend to other complainants who do not identify as women, as such individuals do not fall within the statutory purview of the POSH Act. However, the Foundation commits to providing an equivalent standard of care for all the complainants who reach out under this Policy.



c. Furthermore, while this Policy encompasses all fundamental aspects of the POSH Act, reference must always be made to the POSH Act for any additional clarification requirements, and the provisions of the POSH Act shall take precedence in circumstances where any discrepancy exists between this Policy and the Act.

III. DEFINITIONS

- **a.** An **Employee**, for the purpose of this Policy means any person:
 - i. Full time employees (including those on probation);
 - ii. Part time employees;
 - iii. Consultants (full time/retainer/part time);
 - iv. Volunteers;
 - v. Trainees and interns;
 - vi. Person employed through third party contractors/service providers.
- **b.** Aggrieved Individual or Complainant, in relation to any workplace environment, refers to any person of any age, whether classified as an Employee or not (including, for instance, visitors to the office), who claims to have been subjected to any act or acts of sexual harassment within the workplace context.
- c. Workplace for the purpose of this Policy includes:
 - i. **Primary Workplaces:** The premises and offices of the Foundation and its affiliates, and any place visited by Employees during employment or for any purpose arising out of employment, including transportation facilities provided by the Foundation for undertaking business-related journeys.
 - ii. **Extended Workplace:** Additionally, any individual representing the Foundation in the capacity of an "Employee", anywhere in India or outside, in existing and potential official engagements, out station travels and conferences, training and capacity building programs, official engagements, gatherings and parties, will be considered engaging in *extended workplaces* of the Foundation.
 - iii. Remote Workplace: All official platforms of communication, including but not limited to emails, official discussion forums, official WhatsApp group/s, internal communication platforms (such as Slack, Microsoft teams), telephone conversations with internal or external stakeholders of the Foundation will be considered as "workplace" for all Employees and the guidelines of this Policy will extend to them as well.
- **d. Respondent** refers to any person whether an Employee or a third party in the workplace against whom a complaint of sexual harassment has been made by the complainant.
- e. Internal Complaints Committee ("IC") refers to the internal redressal committee established with the Foundation to receive and inquire complaints pertaining to sexual harassment at workplace incidents and provide its final recommendations to the employer, i.e. management of the Foundation for implementation.

You can find the find the details of the current IC members of the Foundation in Annexure *A* of this Policy.

f. Employer or Management for the purposes of this Policy, refers to the Board of Directors of the Foundation or any individual(s) specifically authorized by the Board of Directors who bear responsibility for implementing the guidelines established under the Act within the Foundation's operational framework.

IV. CONDUCT CONSTITUTING SEXUAL HARASSMENT IN WORKPLACE ENVIRONMENTS

a. Sexual harassment under the provisions of this Policy encompasses and includes (but is not restricted to) any of the following categories of conduct.

i. **Physical Manifestations**

- Unwelcome physical contact and advances of a sexual nature;
- Unwelcome physical touching, patting, pinching, or brushing against another person's body;
- Physical molestation or assault of a sexual nature;
- Physical confinement or restraint against an individual's will.

ii. Verbal Conduct

- Unwelcome sexual requests or explicit or implicit demands for sexual favours, whether in exchange for employment opportunities, promotion prospects, examination results, or evaluation outcomes of any person regarding activities related to the Foundation;
- Making sexually suggestive or explicit remarks, jokes, innuendos, and comments;
- Repeatedly asking an individual to socialize during non-working hours or continued expressions of sexual or romantic interest despite clear rejection of such advances;
- Making sexually coloured remarks or comments of a sexual nature regarding a person's clothing, physical appearance, or body parts;
- Sexual teasing, bullying, or making sexually inappropriate jokes or comments;
- Sexual harassment that specifically targets or is motivated by someone's sexual orientation, gender identity, or gender expression, including but not limited to, sexual comments, jokes, or remarks targeting someone's sexual orientation, gender identity, or gender expression; inappropriate sexual questions about LGBTQ+ relationships, practices; sexual advances based on stereotypes about LGBTQ+ identities; sexual objectification related to someone's gender identity or expression; or sexual threats motivated by someone's LGBTQ+ identity.

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iii. Non-Verbal Conduct

- Unwelcome sexual advances including physical, verbal, and non-verbal conduct or communication of a sexual nature, such as sexually coloured remarks, inappropriate jokes, letters, phone calls, electronic mail, gestures, text messaging, displaying or sharing pornographic material, inappropriate staring or leering, which offends an individual's sensibilities and negatively affects their work performance;
- Display of sexually explicit pictures, posters, calendars, or other materials in the workplace;
- Making sexually suggestive gestures, facial expressions, or body movements;
- Stalking or following an individual with sexual intent.

iv. Digital and Electronic Conduct

- Sending sexually explicit or suggestive electronic communications, including emails, text messages, instant messages, or social media communications;
- Sharing or distributing sexually explicit images, videos, or other digital content;
- Making sexually inappropriate comments or advances through any electronic communication platform.

v. Environmental and Positional Harassment

- Any act or conduct of a sexual nature perpetrated by an individual in a position of authority, which creates a hostile and/or intimidating atmosphere within the workplace environment;
- Sexually coloured acts and remarks including teasing, bullying, physical intimidation, innuendos and taunts, physical confinement against an individual's will, and conduct likely to intrude upon personal privacy and cause emotional distress.

b. Circumstances Constituting Sexual Harassment

The following circumstances, among others, when they occur or are present in relation to or in connection with any act or behaviour of a sexual nature as explained in IV(a), may constitute sexual harassment under this Policy:

- i. **Quid Pro Quo**: Implied or explicit promise of preferential treatment in employment matters in exchange for sexual compliance;
- ii. **Retaliatory behaviour**: Implied or explicit threat of detrimental treatment in employment matters as a consequence of rejection of sexual advances;
- iii. **Employment-Related Threats**: Implied or explicit threats regarding present or future employment status, job security, or career prospects;
- iv. **Hostile Work Environment**: Interference with work performance and/or creating an intimidating, offensive, or hostile work environment for any individual;
- v. **Health and Safety Impact**: Humiliating treatment that is likely to adversely affect the health and safety of the person concerned.

c. Communication Methods: All the aforementioned categories of sexual harassment are prohibited regardless of the method of communication employed, including but not limited to in-person interactions, telephone conversations, voice mail messages, written communications on paper, electronic mail systems, chat applications, SMS messaging, online communication channels (including video, audio, and chat platforms), or any other form of digital or electronic communication medium.

d. Important Clarifications

- i. Acceptable Social Interaction: Sexual harassment does not encompass occasional compliments of a socially acceptable nature that are appropriate to professional relationships. The Policy specifically addresses unwelcome sexually determined behaviour or patterns of conduct that would cause discomfort, distress, and/or humiliation to the individual at whom such behaviour or conduct is directed.
- ii. **Professional Conduct in Personal Relationships**: Employees who are involved in romantic relationships with colleagues must maintain professional conduct and behaviour at all times during official work hours and in workplace environments. This includes avoiding indiscreet behaviour during official work time and refraining from public displays of sexual affection, sexual innuendo, suggestive comments, and/or sexually coloured remarks or jokes within the workplace environment.

V. IC AS REDRESSAL SYSTEM

- **a.** An Internal Complaints Committee ("**IC**") has been set up in the Foundation's office to address complaints of sexual harassment.
- **b.** The IC will have a minimum of 4 Members: a Presiding Officer who will be a senior woman member; 2 members from among the employees, and one External member (third party), who can be from an NGO or a person familiar with the issues relating to sexual harassment.
- c. Half of the members of the IC at all times will be women representatives.
- **d.** Complaints to the IC can be sent at <u>posh_icc@sustainablefutures.org</u>.
- **e.** The IC is responsible for:
 - i. Receiving complaints of sexual harassment at the workplace;
 - ii. Initiating and conducting inquiry as per the established procedure under law;
 - iii. Submitting findings and final recommendations on complaints of sexual harassment at workplace which will be implemented by the Management of the Foundation;
 - iv. Maintaining strict confidentiality throughout the process as per established guidelines; and



v. Ensuring absolute transparency in its activities, disclosing necessary information to the respective stakeholders when required and investigating the complaints while abiding by the principles of natural justice.

VI. REDRESSAL PROCEDURE: HOW IT WORKS

a. FILING A COMPLAINT WITH THE IC

- i. Any Aggrieved Individual who has experienced sexual harassment and wishes to file a complaint, should reach out to the IC.
- ii. Any Aggrieved Individual finding it difficult to locate its IC should request their Managers to help them with IC details.
- iii. An Aggrieved Individual can file a complaint with the IC within three (3) months from the date of the alleged incident of Sexual Harassment and in case of a series of incidents, within a period of three (3) months from the date of the last incident. IC can use its discretion to extend the limit to another three (3) months, if it is satisfied that circumstances existed to prevent the Complainant from filing a complaint within the said period.
- iv. IC can only initiate inquiry on a complaint if the complaint is in writing. Anonymous complaints cannot be accepted by IC at any point in time.
- v. In case an Aggrieved Individual is unable to lodge a complaint on account of any physical or mental incapacity or otherwise, any person with knowledge of the incident may make a complaint to the IC, but only with the written consent of the Complainant. Where the Aggrieved Individual is dead, the complaint may be filed by any person who has knowledge of the incident, with the written consent of her legal heir.
- vi. A reference template has been provided as **Annexure B** for filing the complaints. The complaint must contain description of the event (s) as well as the names and contact email/phone number of witnesses, if any. Supporting documents, if available, such as letters, transcription of text messages etc. supporting the complaint of sexual harassment at workplace against the Respondent should accompany the complaint.

b. PROCESSING A COMPLAINT

- i. On receipt of a written complaint, the IC will:
 - Officially acknowledge the receipt of the complaint through email;
 - Request for any additional details missing from the complaint if required;
 - Share further details of the procedure with the Complainant;
 - Initiate the first meeting with the Complainant:

- To validate the eligibility of the complaint as a sexual harassment complaint: Assess the need of any arrangement in work settings that may be needed for complaints where the Complainant and Respondent are working in close professional association; and
- Present the options of conciliation and formal investigation available to the Complainant.
- ii. If the IC finds that the complaint does not fall within the definition of Sexual Harassment or within the IC's jurisdiction, the complaint will be referred to the Human Resources team for appropriate action. The Complainant will be duly informed.

c. CONCILIATION BEFORE INQUIRY

i. Before initiating a formal inquiry, IC can take steps to settle the matter between the Complainant and the Respondent through a process of conciliation. However, the IC can only proceed with conciliation if the Complainant expressly requests for the same. The request for conciliation must be on record - either through a written request by the Complainant or minutes of the IC's meeting/ report with details of when and how the request was made. No monetary settlement will form the basis of the conciliation.

Note: Conciliation in itself does not necessarily mean acceptance of the offence having been committed by the Respondent, as mentioned in the complaint. It is a practical mechanism through which issues are resolved or misunderstandings are cleared.

ii. If a settlement is arrived at, the IC will record the terms of settlement in its report, along with any other steps suggested for the Respondent (for example, written warning, gender sensitivity counselling, etc). IC will then provide a copy to the Complainant and the Respondent and forward it to the Management of the Foundation for its implementation. There will be no further inquiry conducted by the IC and the case with the IC will stand closed.

d. FORMAL INQUIRY

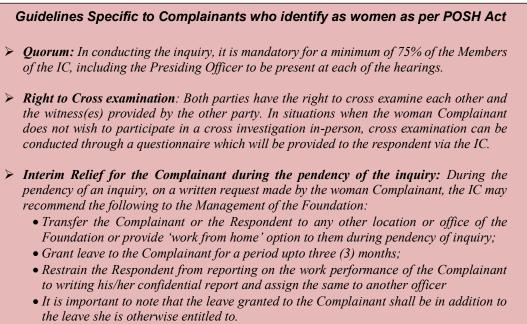
- i. IC will proceed with the formal inquiry if the Complainant does not agree to go with conciliation or the terms of conciliation is not complied with by the Respondent.
- ii. IC will send a copy of the written complaint to the Respondent who is required to file its reply to the complaint with all supporting documents and list of witnesses (if any) within ten (10) working days of receiving the copy of the complaint. A reference template has been provided as **Annexure C** for filing the reply.
- iii. As per the inquiry process, IC will provide equal opportunity for both parties to be heard. Both parties have the right to produce oral or documentary evidence in their



favour. Both the Complainant and Respondent may also ask for cross examining each other and the witness(es) provided by the other party, subject to IC's guidance.

- iv. The IC will consider all evidence and witness(es) available to determine the outcome of the inquiry. IC will follow principles of natural justice and fairness in all its proceedings and will maintain confidentiality of the identity of the Complainant, the Respondent and any witness involved with the inquiry. The internal timelines for the meetings with the Complainant, Respondent and witness(es) will be decided by the IC and communicated to the parties in the course of the inquiry.
- v. IC shall have the powers to summon and enforce the attendance of any person and conduct an examination, request the discovery and production of documents and / or any other matter which may be prescribed and deemed necessary for the inquiry process.
- vi. The inquiry process will be documented and recorded by the IC.
- vii. No legal practitioner can represent any party at any stage of the inquiry process. However, they may be allowed to bring a colleague or family member for support, at the discretion of the IC, provided such colleague will not be permitted to interfere directly with the proceedings except to advise each party privately.
- viii. IC has the right to terminate the inquiry proceedings or to give an ex parte decision on the complaint, if the Complainant or Respondent fails to present themselves without sufficient cause for (3) three consecutive hearings convened by the Presiding Officer, after giving a fifteen days' notice to the party concerned.
 - ix. The inquiry process will be completed by the IC within ninety (90) days from the date of receipt of the complaint and the final inquiry report will be prepared by the IC.
 - x. On completing the inquiry, the IC will then provide its final inquiry report to the Management of the Foundation within a period of 10 days from the date of completion of the inquiry. A copy of the report will be provided to the Complainant & Respondent.

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• On receiving a recommendation from the IC, the Management of the Foundation shall implement the recommendations and send a report of such implementation to the IC.

VII. FINAL INQUIRY REPORT BY IC AND ITS IMPLEMENTATION

a. When the Complainant's allegations are not proved

- i. Where the IC concludes that the allegation against the Respondent has not been proved, it shall recommend to the Management of the Foundation that no action is required to be taken in this matter.
- ii. Further, upon sharing of the final report, the IC will ensure that both parties understand that the matter has been fully investigated and concluded to the best of the efforts of the IC and in alignment with the law, and this Policy.
- **b.** When the Complainant's allegations are proved: If the IC arrives at the conclusion that the allegation against the Respondent has been proved, it shall recommend in writing to the Management of the Foundation to take action against the Respondent, which may include one or more among the following:
 - i. a written apology from the Respondent;
 - ii. a letter of warning may be placed in the personal file of the Respondent;
 - iii. reprimand or censure;
 - iv. immediate transfer or suspension without pay;
 - v. withholding of pay rise or increment(s);
 - vi. undergoing a counselling session;
 - vii. carrying out community service; and/or
 - viii. termination from service.

c. The inquiry report of the IC shall be treated as the final report and the recommendations of the IC shall be implemented by the Foundation. The Foundation is provided **sixty (60) days** to implement the recommendations of the IC.

Guidelines Specific to Complainants who identify as women as per POSH Act: Recommendation by IC for payment of compensation

- *a)* The IC may also recommend payment of compensation to the Complainant by the Respondent. For the purpose of determining the sum to be paid, the IC shall take into account:
 - *i.* The mental trauma, pain, suffering and emotional distress caused to the Complainant;*ii.* The loss in the career opportunity (caused to the Complainant) due to the incident(s) of
 - sexual harassment; iii. Medical expenses incurred by the Complainant for physical treatment or counseling; and/or
 - iv. Feasibility of such payment being made in lump sum or in installments.
- *b) IC may also recommend the manner of collection of the compensation in its inquiry report as per the provisions of the POSH Act:*
 - *i.* If the Respondent is still employed with the Foundation: to deduct the decided amount from the salary;
 - *ii.* If the Respondent is no longer employed by the Foundation, to have the former pay the amount to the Complainant;
 - *iii.* If the Respondent fails to pay as per point 2, then the IC can ask the District Officer (appointed under the Act) of the district of appropriate jurisdiction / where offices of the Foundation are located, to recover the sum as an arrears of land revenue.

VIII. FALSE OR MALICIOUS COMPLAINTS

- a. Where the IC concludes that the allegation against the Respondent is malicious or the Complainant or any other person making the complaint has made the complaint knowing it to be false or the Complainant or any other person making the complaint has produced any forged or misleading document, it may recommend to the Employer to take action against the person making the complaint.
- b. While deciding malicious intent, the mere inability to substantiate a complaint need not mean malicious intent or that it is a false complaint.
- c. The action recommended should be similar to the ones proposed for the Respondent in case of substantiated complaints.
- d. In case a witness has given false evidence or produced any forged or misleading document during the inquiry, action may also be taken against the said witness in accordance with the applicable Policy of the Foundation.

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IX. CONFIDENTIALITY

- a. The following information is considered strictly confidential and must not be published, disclosed, or made known to the public, media, or any unauthorized individuals:
 - Identity and personal information of the Complainant
 - Identity and personal information of the Respondent
 - Identity and personal information of witnesses
 - Statements, testimony, and other evidence obtained during the course of the inquiry process
 - Recommendations made by the IC
 - Disciplinary actions taken by the Employer in response to IC recommendations
- b. All individuals who are part of the IC inquiry will need to sign a confidentiality undertaking, to prevent leakage of any detail in relation to the inquiry process.
- c. Any individual who contravenes or violates the confidentiality requirements established under this Policy will be subject to disciplinary action as prescribed in the POSH Act and any other applicable internal policies of the Foundation.

X. APPEAL AGAINST THE INQUIRY CONDUCTED BY IC

- a. In case the inquiry process is conducted by the IC and the Complainant identifies as a woman: Any person aggrieved (Complainant or Respondent) by the recommendations related to the quantum or nature of penalties made by the IC, or the non-implementation of such recommendations by the Employer may file an appeal to the Appellate Authority in accordance with the Act and Rules within three (3) months from the date of the final inquiry report. (Such appellate authority is the respective Central Government Industrial Tribunal-cum-Labour Court appointed in various States)
- b. In case the inquiry process is conducted by the IC where the Complainant is other than a woman: Any person aggrieved (Complainant or Respondent) by the decision of the IC related to the quantum or nature of penalties recommended by the IC, appeal will lie with the Appeal Board for such matters, consisting of three members (two External directors on the Board of the Foundation and the Chairperson of the Advisory Council of the Foundation). Even after this, if the person aggrieved is still dissatisfied, it may approach a local Civil Court of relevant jurisdiction for further redressal.

XI. NON-RETALIATION

a. **Encouragement of Open Communication:** This Policy is designed to encourage all employees to express freely, responsibly, and in an orderly manner their opinions and concerns about any problem or complaint related to sexual harassment within the workplace environment.



- b. **Prohibited Retaliation:** Retaliation against individuals who report sexual harassment incidents, provide information about sexual harassment, or provide testimony regarding behaviour that might constitute sexual harassment is strictly prohibited under this Policy.
- c. **Forms of Prohibited Retaliation:** Any act of retaliation, including but not limited to internal interference, coercion, restraint, intimidation, or adverse employment action by any Employee, constitutes a violation of this Policy and must be reported immediately to the Management of the Foundation for appropriate action.

XII. EXCEPTIONS AND AMENDMENTS

This Policy will undergo periodic review and assessment to ensure its continued effectiveness and compliance with applicable legal requirements. This Policy is subject to modification and amendment by the Foundation as deemed necessary to address changing legal requirements, organizational needs, or best practices in workplace harassment prevention.

SFC RESEARCH FOUNDATION

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ANNEXURE A

The members of the IC at SFC are as follows:

- 1. Presiding Officer: Shibani Ghosh
- 2. Member: Nikita Shukla
- 3. Member: Aman Srivastava
- 4. External Member: Esha Shekhar, Legal Consultant

How to reach out to IC? You can send your complaint to: posh_icc@sustainablefutures.org

How to reach out to IC members?

- 1. Presiding Officer: Shibani Ghosh, <u>shibanighosh@sustainablefutures.org</u>
- 2. Member: Nikita Shukla, nikita@sustainablefutures.org
- 3. Member: Aman Srivastava, <u>aman@sustainablefutures.org</u>
- 4. External Member: Esha Shekhar (09811579688); esha.s@eslawoffices.com



ANNEXURE B: Format of the Complaint suggested for Complainant

Date of the complaint submission:	
Name of the Complainant:	
Preferred pronoun (optional):	
Gender Identity (optional):	
Designation:	
Function/Department:	
Name of the Respondent:	
Designation:	
Function/Department:	

Date of the incident (*If the incident has been repeated multiple times, please mention the date of the recent one*):

Details of the complaint/incident (Please write as much in detail as required):

Name/s of witness/es you would like to provide from your end:

(Please note that these are the members from the Foundation who can provide support to your complaint and will be called by the IC during the inquiry. It will help the IC to conduct its inquiry if you provide witness(es) from your side. Feel free to speak to any of the IC members to understand this further.)

Mention any evidence (in the form of SMS, WhatsApp messages, video, audio, email, or any other format or form) that you have or would like to present to support your complaint.

Any other information that you would like to bring to the notice of the IC to support your complaint:

Name and signature of the Complainant (applicable when you are submitting hard copies of the complaint to the IC)



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ANNEXURE C: Format of the Reply suggested for Respondent

Name of the Respondent:	
Preferred pronoun (optional):	
Gender Identity (optional):	
Designation:	
Function/Department:	

Your reply to the complaint received by the Complainant against you:

(Please note that this is the opportunity presented to you to provide your side of the story in relation to the complaint received. Details provided by you here will help the IC conduct its inquiry in a fair manner)

Name/s of witness/es you would like to provide from your end:

(Please note that these are the members from the Foundation who can provide support to your reply and will be called by the IC during the inquiry. It will help the IC to conduct its inquiry if you provide witness(es) from your side. Feel free to speak to any of the IC members to understand this further.)

Mention any evidence (in the form of SMS, WhatsApp messages, video, audio, email, or any other format or form) that you have or would like to present to support your reply to the complaint.

Any other information that you would like to bring to the notice of the IC to support your reply to the complaint:

Name and signature of the Respondent (applicable when you are submitting hard copies of the complaint to the IC)