



POLICY ON PREVENTION OF SEXUAL HARASSMENT AT WORKPLACE

I. COMMITMENT:

Our Company is committed to providing work environment that ensures every employee is treated with dignity and respect and afforded equitable treatment.

The Company is also committed to promoting a work environment that is conducive to the professional growth of its employees and encourages equality of opportunity.

The Company will not tolerate any form of sexual harassment and is committed to take all necessary steps to ensure that its employees are not subjected to any form of harassment.

II. SCOPE:

This policy applies to all employees (full-time, part-time, trainees and those on contractual assignments) of the Company including all subsidiaries and affiliated companies at their workplace or at client sites. The Company will not tolerate sexual harassment, if engaged in by clients or by suppliers or any other business associates.

The workplace includes:

1. All offices or other premises where the Company's business is conducted.
2. All company-related activities performed at any other site away from the Company's premises.
3. Any social, business or other functions where the conduct or comments may have an adverse impact on the workplace or workplace relations.

III. DEFINITION OF SEXUAL HARASSMENT:

Sexual harassment may be one or a series of incidents involving unsolicited and unwelcome sexual advances, requests for sexual favours, or any other verbal or physical conduct of sexual nature.

Sexual Harassment at the workplace includes:

1. unwelcome sexual advances (verbal, written or physical),
2. demand or request for sexual favours,
3. any other type of sexually-oriented conduct,
4. verbal abuse or 'joking' that is sex-oriented,
5. any conduct that has the purpose or the effect of interfering with an individual's work performance or creating an intimidating, hostile or offensive work environment and/or submission to such conduct is either an explicit or implicit



term or condition of employment and /or submission or rejection of the conduct is used as a basis for making employment decisions.

Inappropriate conduct could also be a joke, a prank or even a compliment. These gestures also lead to harassment although the intention of the individual might not be to offend the other person.

IV. RESPONSIBILITIES REGARDING SEXUAL HARASSMENT:

All employees of the Company have a personal responsibility to ensure that their behavior is not contrary to this policy.

All employees are encouraged to reinforce the maintenance of a work environment free from sexual harassment.

V. COMPLAINT MECHANISM:

An appropriate complaint mechanism in the form of “Complaints Committee” has been created in the Company for time-bound redressal of the complaint made by the victim.

VI. COMPLAINTS COMMITTEE:

The Company has instituted a Complaints Committee for redressal of sexual harassment complaint (made by the victim) and for ensuring time bound treatment of such complaints.

Initially, and till further notice, the Complaints Committee will comprise of the following four members:

1. Presiding Officer: Woman employee as decided by the company
2. Senior Woman Employee from HR Function (Member)
3. Any Senior employee of the company nominated by Business Head (Member)
4. Member from an NGO or Lawyer (Member)

The Presiding Officer reserves the right to nominate more members of appropriate seniority and rank in the committee to conduct such enquiries to ensure equal representation of the gender as that of the complainant or for any other valid reason.

The Complaints Committee is responsible for:

- Investigating every formal written complaint of sexual harassment
- Taking appropriate remedial measures to respond to any substantiated allegations of sexual harassment
- Discouraging and preventing employment-related sexual harassment

VII. PROCEDURES FOR RESOLUTION, SETTLEMENT OR PROSECUTION OF ACTS OF SEXUAL HARASSMENT:

The Company is committed to providing a supportive environment to resolve concerns of sexual harassment as under:

A. Informal Resolution Options

When an incident of sexual harassment occurs, the victim of such conduct can communicate their disapproval and objections immediately to the harasser and request the harasser to behave decently.

If the harassment does not stop or if victim is not comfortable with addressing the harasser directly, the victim can bring their concern to the attention of the Complaints Committee for redressal of their grievances. The Complaints Committee will thereafter provide advice or extend support as requested and will undertake prompt investigation to resolve the matter.

B. Complaints:

1. An employee with a harassment concern, who is not comfortable with the informal resolution options or has exhausted such options, may make a formal complaint to the Presiding Officer of the Complaints Committee constituted by the Management. The complaint shall have to be in writing and can be in form of a letter, submitted within 3 months from the date of the incident and in case of a series of incidents, within a period of 3 months from the date of the last incident. The Complaints Committee can extend the timeline for filing the complaint, for reasons to be recorded in writing, by a period of 3 months. Alternately, the employee can send complaint through an email. The employee is required to disclose their name, department and location they are working in, to enable the Presiding Officer to contact them and take the matter forward.

Employees may also write directly to the Whistle Officer appointed by the Company at gcla.disclosure@godrejkoerber.com .

Complaint against any member of the Complaints Committee or Business Head should be sent directly to the Directors of the Company-

2. The Presiding Officer of the Complaints Committee will proceed to determine whether the allegations (assuming them to be true only for the purpose of this determination) made in the complaint fall under the purview of Sexual Harassment, preferably within 30 days from receipt of the complaint.

In the event, the allegation does not fall under the purview of Sexual Harassment or the allegation does not constitute an offence of Sexual Harassment, the Presiding Officer will record this finding with reasons, and communicate the same to the complainant.



3. If the Presiding Officer of the Complaints Committee determines that the allegations constitute an act of sexual harassment, he/ she will proceed to investigate the allegation with the assistance of the Complaints Committee.
4. Where such conduct, on the part of the accused, amounts to a specific offence under the law, the Company shall initiate appropriate action in accordance with law by making a complaint with the appropriate authority.
5. The Complaints Committee shall conduct such investigations in a timely manner and shall submit a written report containing the findings and recommendations on action to be taken to the Business Head as soon as practically possible and in any case, not later than 90 days from the date of receipt of the complaint. The Whistle Officer, Head- HR and the Business Head- will jointly take decision on the corrective action based on the recommendations of the Complaints Committee and keep the complainant informed of the same.

Corrective action may include any of the following:

- a. Formal apology
 - b. Counselling
 - c. Written warning to the perpetrator and a copy of it maintained in the employee's file.
 - d. Change of work assignment / transfer for either the perpetrator or the victim.
 - e. Suspension or termination of services of the employee found guilty of the offence
6. In case the complaint is found to be false, the Complainant shall, if deemed fit, be liable for appropriate disciplinary action by the Management.

[\(For more details, refer to the pictorial representation of the process flow given in Annexure B\)](#)

VIII. CONFIDENTIALITY:

The Company understands that it is difficult for the victim to come forward with a complaint of sexual harassment and recognizes the victim's interest in keeping the matter confidential.

To protect the interests of the victim, the accused person and others who may report incidents of sexual harassment, confidentiality will be maintained throughout the investigatory process to the extent practicable and appropriate under the circumstances.

IX. ACCESS TO REPORTS AND DOCUMENTS:



All records of complaints, including contents of meetings, results of investigations and other relevant material will be kept confidential by the Company except where disclosure is required under disciplinary or other remedial processes.

X. PROTECTION TO COMPLAINANT / VICTIM:

The Company is committed to ensuring that no employee who brings forward a harassment concern is subject to any form of reprisal. Any reprisal will be subject to disciplinary action.

The Company will ensure that the victim or witnesses are not victimized or discriminated against while dealing with complaints of sexual harassment.

However, anyone who abuses the procedure (for example, by maliciously putting an allegation knowing it to be untrue) will be subject to disciplinary action.

XI. CONCLUSION:

In conclusion, the Company reiterates its commitment to providing its employees, a workplace free from harassment/ discrimination and where every employee is treated with dignity and respect.

Annexure A

FAQs on Prevention of Sexual Harassment at Workplace

1. What does the term 'sexual harassment' mean?

→ 'Sexual harassment' is defined as unwelcome sexual advances, requests for sexual favors and other verbal/visual/physical conduct of a sexual nature when:

1. submission to such conduct is made a term or condition of employment, promotion, examination or evaluation of an individual towards any company activity OR
2. submission to OR rejection of such conduct is used as a basis for employment, promotion, examination or evaluation decisions affecting the individual; OR
3. such conduct has the purpose OR effect of unreasonably interfering with an employee's work performance creating an intimidating, hostile, OR offensive working environment.

2. What are the acts which constitute sexual harassment?

→ Many different kinds of conduct - verbal, visual or physical, that is of a sexual nature, may be sexual harassment, if the behavior is unwelcome and if it is severe or pervasive. Some examples may include, but are not limited to, the following:

- Verbal or written: Comments about clothing, personal behavior / life, or a person's body; suggestive or obscene letters / notes / invitations / emails OR phone calls / SMSes; turning work discussions to sexual topics; sexual or gender-based jokes OR teasing; demand / request of sexual favors OR continued expressions of sexual interest after being informed that the interest is unwelcome; sexual taunts OR innuendos etc.
- Physical: Unnecessary / inappropriate physical contact; obstructing OR blocking movement; assault etc.
- Non-verbal: Derogatory gestures OR facial expressions of a sexual nature; following a person etc.
- Visual: Posters, drawings, pictures, screen-savers OR emails of a sexual nature; showing of pornography etc.

3. In case an employee is facing sexual harassment, what should he / she do?

→ The concerned employee should make a complaint to the Presiding Officer of the Complaints Committee constituted by the Management by writing a letter sent in a sealed envelope. Alternately, the employee can send complaint through an email. The employee is required to disclose his / her name, department, division and location where the employee is working in, to enable the Presiding Officer to contact them and take the matter forward.

4. Who are the members of the current Complaints Committee?

→ The Company has instituted a Complaints Committee for redressal of sexual harassment complaint (made by the victim) and for ensuring time bound resolution of such complaints. Till further notice, the Complaints Committee will comprise of four members, out of which at least two members will be of the same gender as that of the complainant. Refer to Annexure C for contact details of the members of the location wise Complaints Committees.

The Presiding Officer reserves the right to nominate more members of appropriate seniority and rank in the committee to conduct such enquiries.

5. What will the Complaints Committee do on receiving a complaint of sexual harassment from an employee?

→ 1) The Complaints Committee shall take immediate necessary action to cause an inquiry to be made discreetly or hold an inquiry, if necessary & keeping the matter confidential.

2) The Complaints Committee shall, after examination of the complaint, submit its recommendations to the "Whistle Officer" appointed by the Company. If the examination of the complaint reveals that the accused is guilty, the Committee shall also recommend the disciplinary action to be taken.

3) The decision of the Management will then be communicated to the accused as well as the complainant.

6. What can be the consequences of sexual harassment?

→ The Company will take each complaint of sexual harassment seriously and investigate. If any employee is found guilty of any conduct that can be construed as sexual harassment, the employee will be liable to corrective action which may include any of the following:

- Formal apology
- Counselling
- Written warning to the perpetrator and a copy of it maintained in the employee's file.
- Change of work assignment / transfer for either the perpetrator or the victim.
- Suspension or termination of services of the employee found guilty of the offence

7. How can an employee feel assured that their complaint of sexual harassment will be kept confidential or that they will not face any threats and other dangerous retaliatory behaviour from the accused individual?

→ If an employee experiences sexual harassment; he / she should bring it to the Management's notice without any fear or hesitation. It is the responsibility of the Complaints committee to maintain complete confidentiality of all complaints concerning sexual harassment. Taking action against any employee, who brings a sexual harassment issue to the Management's notice, is strictly forbidden.

Reports of threats and other forms of retaliatory behaviour will be taken seriously. Anyone found to have retaliated against an employee will face disciplinary action and possible dismissal.

8. An incident of sexual harassment against an employee took place outside the Company premises at

- i. **a dealer's office; or**
- ii. **while on official tour; or**
- iii. **during a business conference. Will it be covered under the policy?**

→ Yes, this Policy will be applicable to all allegations of sexual harassment made by an employee, irrespective of whether sexual harassment is alleged to have taken place within or outside the Company premises, during the course of employment.



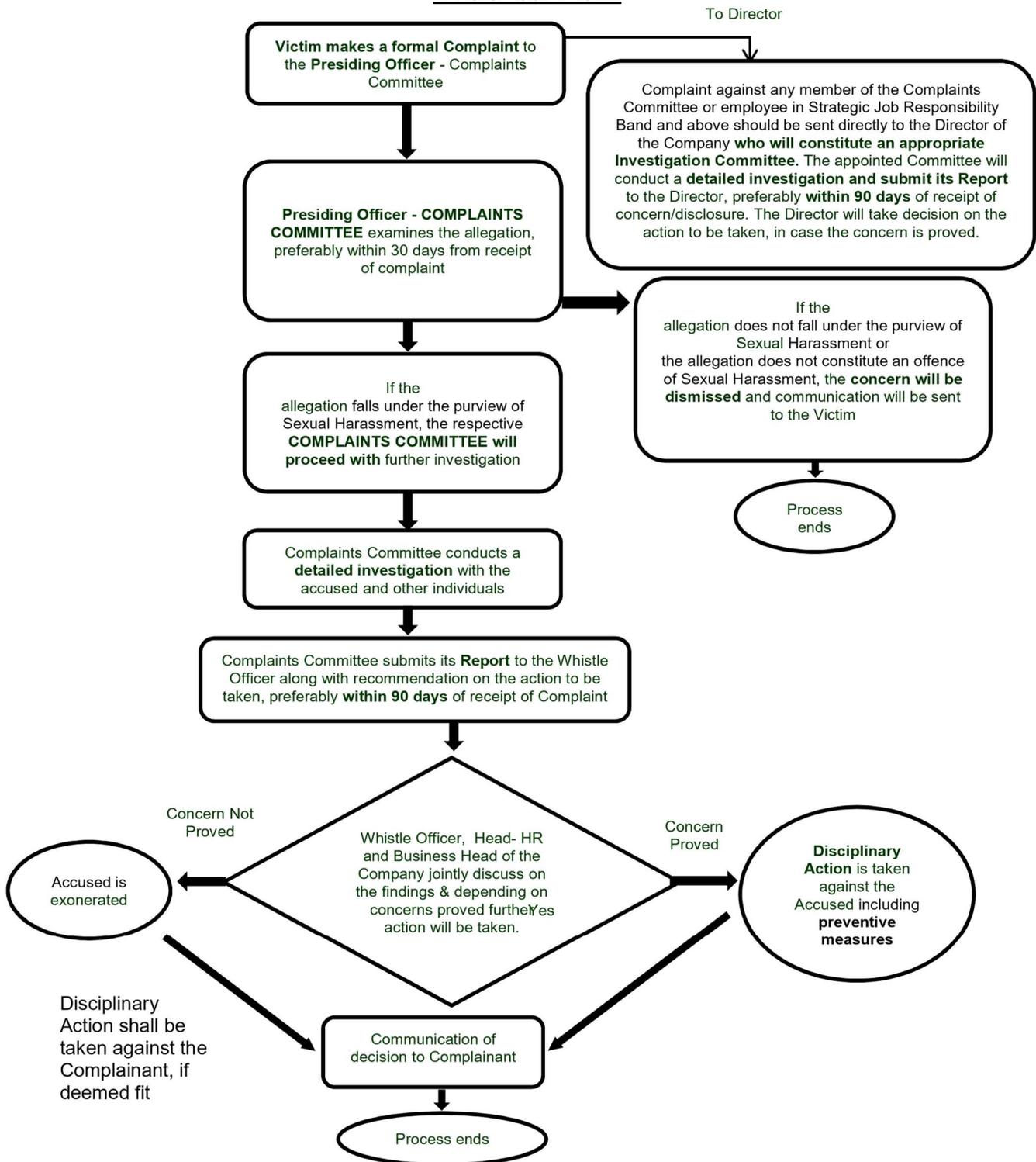
9. What are the rights of the accused person?

→ Accused person has below mentioned rights:

1. the right to be heard. The Committee must give adequate time and opportunity to them to communicate their say on the matter
2. the right to be informed of the outcome of the investigation and shall be so informed in writing by the Company after the completion of the inquiry/ investigation process

Annexure B

PROCESS FLOW





Annexure- C

Name and Contact details of Complaints Committee Members

The Company has instituted Complaints Committee which has four Committee members as mentioned below:

Committee members:

| Role | Name | Contact No. | Email ID |
|-------------------|-------------------|--------------------|--|
| Presiding officer | Ms. Suneeta Mane | 022-61393862 | suneeta.mane@godrejkoerber.com |
| Member | Ms. Ashwini Karir | 022-61393809 | ashwini.karir@godrejkoerber.com |
| Member | Mr. Suresh Sawant | | suresh.sawant@godrejkoerber.com |
| External Member | Mr. Bharat Goyal | - | bggoyal63@gmail.com |