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| Prevention of Personal and/or Sexual Harassment (POPSH) at Workplace | Policy Number: HR/04 Policy Owner: Corporate HR Authorized by: VP-Corporate HR Access Level: 0 -5 |
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Objective

1. To provide a general definition of personal and sexual harassment.
2. To prohibit personal and sexual harassment and related retaliation.
3. To prohibit any unlawful activity.
4. To set out procedures to follow when an associate believes a violation of the policy has occurred.

Applicability

The policy is applicable to all associates and full time in-house consultants on rolls of the Company.

Policy Guidelines

Any and/or all allegations of sexual or personal harassment shall be governed by the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and rules framed there under as amended till date (hereinafter "**the Act**").

The Company will not tolerate acts of personal and/or sexual harassment or related retaliation against or by any associate. It is intended that associates violating this policy shall be disciplined up to and including termination of services and taking legal recourse, if deemed necessary.

1. Definitions

a. Sexual Harassment

Sexual harassment consists of interaction between individuals of the same or opposite sex that is characterized by unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature.

Conduct of a sexual nature may include, **but is not limited to**, verbal or physical sexual advances, including subtle pressure for sexual activity; touching, pinching, patting, or brushing against; comments regarding physical or personality characteristics of a sexual nature.

Examples of Sexual Harassment are (**but not limited to**):

Requests for sexual favors, Jokes of a sexual nature, Suggestive remarks, Displaying pictures, posters or cartoons of a sexual nature, Displaying pornographic material, Making sexually derogatory sounds and comments, Whistling, Unwelcome touching, Sharing sexually suggestive e-mail messages.

The following circumstances if it occurs or is present in relation to or connected with any act or behavior of listed out hereinabove may also amount to sexual harassment:

- i. Implied or explicit promise of preferential treatment in employment;
- ii. Implied or explicit threat of detrimental treatment in employment;
- iii. Implied or explicit threat about the present or future employment status;
- iv. Interference with the associate / consultant's work or creating an intimidating or offensive or hostile work environment; or
- v. Humiliating treatment likely to affect health or safety of the associate / consultant.

b. Personal Harassment

The Company is committed to maintaining a positive learning and working environment. The Company does not discriminate on the basis of race, color, origin, sex, age, disability, creed or religion. Associates are expected not to discriminate with other associates on the above and any such behavior shall invite serious disciplinary action.

Personal harassment may include, **but is not limited to**, the following:

- i. Use of foul language.
- ii. Derogatory remarks about a person's geographical origin, race, language or accent.
- iii. Display of explicit or offensive calendars, posters, pictures, drawings or cartoons which reflect negatively upon a person's class.
- iv. Disrespectful comments even if unrelated to a person's race, color, statehood, religion, age or disability.
- v. Teasing or references to an individual's age or disability.
- vi. Victimization of an associate based on the above and/or personal bias/dislike.

c. Workplace

In addition to the place of work [head office / branch offices, etc.], workplace shall also include any place where the associate / consultant visits in connection with his/her work, during the course of and/or arising out of employment/ contract/ engagement with Lodha, including transportation provided by Lodha for undertaking such a journey.

d. Complainant

A Complainant is a person who is subject to alleged personal or sexual harassment.

e. Respondent

A Respondent is a person whose alleged conduct is the subject of a complaint.

2. Constitution of Prevention of Personal and/or Sexual Harassment Committee (POPSHC)

The Company shall nominate the POPSHC committee consisting of 4 members plus the Chairperson of the Committee. Ideally, the committee shall have a female member (preferably level 0 associate) as the Chairman of the POPSHC. The committee shall have at least 50% female associates as its members. There shall be at least 1 associate from the HR department as permanent member of the committee. The membership of the committee shall be for a period of 1 year after which the management may decide to retain/replace members of the committee. The POPSHC Committee is also known as Internal Complaints Committee (ICC). As per the policy

guidelines, the company has nominated the following members in the “**Prevention of Personal and/or Sexual Harassment Committee**” (POPSHC):-

- i. Janhavi Sukhtankar–Chairperson
- ii. Neha Bhide - External Member
- iii. Martin Godard- HR Representative
- iv. Sanjyot Rangnekar
- v. Abhijeet Shinde

3. Prohibition of Personal & Sexual Harassment

- a. It has to be understood by all concerned that the actual intent of personal and sexual harassment is irrelevant. What is relevant is the impact of the behavior on the recipient.
- b. Further, harassing behavior can be verbal, non-verbal, or physical. “Offensive” is in the eye of the beholder or the recipient of the behavior. What is NOT offensive to one person may be offensive to another, despite the intent of the alleged offender. Severe acts may be judged based on a single act. Less severe acts may constitute harassment if repeated.
- c. The Company shall ensure explicit protection of the confidentiality of the victim of Harassment, the alleged Respondent and the witnesses.
- d. The Company shall guarantee that neither Complainant nor witnesses will be subjected to retaliation.
- e. The Lodha Group of Companies prohibits any form of Personal and/or Sexual Harassment by any of its associates and shall take severe disciplinary action against any person/s found guilty of any such conduct/s.

4. Complaint Redressal Mechanism:

- a. Any aggrieved person may make, in writing, a complaint of sexual /personal harassment at workplace to the POPSH Committee giving details of the sexual harassment meted out to her/him within a period of three (3) months from the date of incident and in case of a series of incidents, within a period of three (3) months from the date of last incident, which may be extended for a further period of (3) months, if circumstances warrant such extension in the opinion of the POPSH Committee.
- b. The Chairperson or any member of the POPSH Committee can render reasonable assistance to the person for making the complaint in writing, in case they are unable to do so.
- c. On receipt of complaint, the POPSH Committee shall decide the place and time for hearing the complaint and shall intimate the date, time and place of hearing to the Complainant and Respondent. The POPSH Committee shall follow principle of natural justice while handling such complaints.
- d. Where the aggrieved person is unable to make a complaint on account of their physical, mental or any other incapacity, a complaint may be filed by: a) a relative or friend; or b) a co-worker; or c) any person who has knowledge of the incident, with the written

consent of the aggrieved person.

- e. The Complainant or person authorized by the Complainant as per the preceding paragraph, shall make a complaint to the POPSH Committee through the following mode:
 - i. Copy of complaint along with supporting documents and names and address of witness shall be sent to POPSH Committee. The POPSH Committee, if required, may ask for additional information for investigation.
 - ii. On receipt of complaint, the POPSH Committee shall provide a copy of complaint along with supporting documents to the Respondent within seven (7) working days.
 - iii. Respondent shall file reply within 10 working days of receipt of the complaint along with list of documents, names and addresses of witnesses.
 - iv. POPSH Committee shall investigate in detail into the matter of the complaint. The POPSH Committee shall have the right to call the person against whom the complaint is made or any other witnesses as and when necessary.
 - v. The POPSH Committee must complete its investigation within a period of 90 days.

5. Inquiry Report and Action:

- a. The POPSH Committee shall on completion of the inquiry provide a report of its findings to the Chairman of Lodha Group or to a Director nominated by him for the purpose, within 10 days from the date of completion of the inquiry and such report shall be made available to the concerned parties.
- b. If the allegation against the Respondent has not been proved, the POPSH Committee may recommend that no action needs to be taken in the matter.
- c. If the POPSH Committee arrives at the conclusion that the allegation against the Respondent has been proved, **it shall result in termination of employment of the Respondent from the Company, without any notice pay or any other perks.**
- d. Lodha shall act upon the recommendation of POPSH Committee within sixty (60) days of receiving the report.
- e. It is understood that all members of the POPSH Committee should maintain complete confidentiality.
- f. HoD - HR shall be informed by the Director (as mentioned in paragraph (a)) of the punishment of the Respondent, if any, and necessary action would be initiated by the HR team within three(3)days.

6. False Accusations:

The complaint of personal or sexual harassment made by any person shall be taken up with

utmost seriousness by Lodha. However, there shall be zero tolerance for any false accusation. If the POPSH Committee comes to a conclusion that the allegation was made with malicious intent or the Complainant produced false or forged or misleading documents to prove his/her case, the POPSH Committee may recommend disciplinary action to be taken against the Complainant.