

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

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.

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 be invite serious disciplinary action.

Personal harassment may include, **but is not limited to**, the following: Use of foul language.

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

c. Prevention of Personal and 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.

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. Martin Godard - HR Representative

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. Prohibition of Personal & Sexual Harassment

a. It has to be understood by all concerned that the actual intent of the 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.**
- f. **Obligation to Report:** In order to take appropriate corrective action, the Company must be made aware of personal/ sexual harassment or related retaliation. Therefore, anyone who believes that he/she has experienced or witnessed sexual harassment or related retaliation should promptly report in writing (email from Company id) such behavior to the Chairman or any member of the POPSHC.
- g. **Timeline of Reports:** Complaints under this Policy shall be addressed and resolved as promptly as practicable after the complaint or report is made. Ordinarily, investigations shall be concluded and reports submitted to the reviewing committee no later than 30 days following the receipt of a complaint.
- h. Upon receipt of the complaint, the Chairman of the POPSHC shall decide the investigating officer. The investigating officer shall conduct an inquiry and submit the report to the Chairman, POPSHC within 15 days.
- i. The POPSHC shall be convened after receipt of the report and the committee shall discuss in detail the findings of the report and determine whether the policy has been violated. It may be understood that all members of the committee and the investigating officer should maintain complete confidentiality. The committee, if required, may ask for additional information/investigation.
- j. If an investigation is conducted, the complainant and the respondent shall have the right to:
 - i. Receive written notice of the report or complaint, including a statement of the allegations, soon after the commencement of the investigation as is practicable.
 - ii. Present relevant information to the investigator(s); and
 - iii. Receive, at the conclusion of the investigation and appropriate review, a copy of the investigator's report.
- k. The respondent shall have the opportunity to give his final comments based on (j) above. After the response from the respondent is received the POPSHC shall prepare the final report.
- l. The report will then be submitted to the Chairman of Lodha Group of Companies or to a Director nominated by him for the purpose.

- m. **Any proven case of Personal / Sexual Harassment shall result in termination of employment from the Company, without any notice pay or any other perks.**
- n. President - HR shall be informed by the Director of the punishment of the respondent, if any and necessary action would be initiated within 1 day.
- o. **The whole process shall in no case exceed 60 days from the day of submission of complaint.**
- p. Note: It is also a violation of this Policy for anyone acting knowingly and recklessly, either to make a false complaint of sexual/personal harassment and/or to provide false information regarding a complaint. In such case strict disciplinary action will be taken by the Company.

3. Unlawful Activities:

- a. All associates are expected to abide by the law. In case it is found that associate is engaged in unlawful activities then:
 - i. Report to Corporate HR/POSPHC
 - ii. POSPHC to appoint 2 independent agencies to investigate the matter.
 - iii. If found that the investigation report is likely true, then POSPHC will inform Corporate HR who will offer counseling to rectify the situation.
- b. However, in connection to the following; immediate termination (without notice pay) will follow:
 - i. Terrorism
 - ii. Murder
 - iii. Extortion
 - iv. Rape
 - v. Kidnapping
 - vi. Prostitution (involvement/usage)
 - vii. Theft
 - viii. Rioting
 - ix. Illegal Betting
 - x. Drugs trafficking / consumption
 - xi. Activities of similar nature in opinion to POSPHC.

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