

Policy on Prevention and Redressal of Sexual Harassment at Workplace

Overview

Ajmera Realty & Infra India Limited is an equal employment opportunity company and is committed to creating a healthy and secured working environment that enables employees to work without fear of prejudice, gender bias and in a harassment free workplace to all employees without regard to race, caste, religion, colour, ancestry, marital status, gender, age, nationality, ethnic origin or disability.

The Sexual Harassment of Women at Workplace (Prevention, Prohibition Redressal) Act (the "Act") provides protection against sexual harassment of women at workplace and address complaints of sexual harassment. Consequent to the enactment of the Act and in pursuance of the provisions of Section 4 of the Act an Internal Complaints Committee ("ICC") has been constituted.

As a matter of internal policy of the Company, the harassment of any person at the workplace is strictly rejected by the company and essential awareness to that effect is consciously generated through training programme by the organization.

Definition and Scope

- Sexual harassment is any unwanted, unwelcome, or uninvited behavior of a sexual nature which makes a person feel humiliated, intimidated or offended. Sexual harassment can take many different forms and may include physical contact, verbal comments, jokes, propositions, the displaying of offensive material or other behavior which creates a sexually tense or hostile working environment.
- Sexual harassment can occur between an employee and a co-worker, supervisor, manager, agent, consultant or contractor etc..
- Sexual harassment is not just unlawful behavior, gesture, message transmission etc during working hours or in the workplace itself but also includes any unlawful communication done by one person with the other person in the premises of the organization. The behavior is unlawful in any work-related context, including conferences, work functions, business or field trips, and interactions with clients.
- Ajmera Group believes that comments and behaviour which may not offend one person can offend another. Management accepts that different individuals may react differently and expects that every person would respect anti-harassment right to be generally.
- Ajmera Group encourages any employee who feels that they have been harassed, to immediately contact their Reporting Manager / HR Head or right about the same directly to the grievance redressal committee.
- Any complaints or reports of sexual harassment will be treated promptly, seriously and sympathetically. Such complaints will be investigated thoroughly, impartially and confidentially. Managers and supervisors must act immediately on any reports of sexual harassment. Employees will not be disadvantaged in their employment conditions or opportunities as a result of lodging a complaint.
- Appropriate disciplinary action will be taken against anyone in this company's employment who is found to have sexually harassed a co-worker.
- Ajmera Group has a legal responsibility to prevent sexual harassment within its business premises, includes virtual premises or anywhere during the course of business operations.

- Therefore, managers and supervisors have a responsibility to:
 - Monitor the working environment to ensure acceptable standards of conduct are observed at all times
 - Model appropriate behaviour themselves
 - Treat all complaints seriously and take immediate action to investigate and resolve the matter
 - Refer complaints to Human Resource Department if they do not feel they are the best person to deal with the case (e.g. if there is a conflict of interest or if the complaint is particularly complex or serious)
- All employees have a responsibility to:
 - Comply with the organisation's sexual harassment policy
 - Offer support to anyone who is being harassed and let them know where they can get help and advice (they should not approach the harasser themselves)
 - Maintain complete confidentiality if they provide information during the investigation of a complaint (employees who spread gossip or rumour's may expose themselves to defamation action)

Objective

- To foster a professional, open and trusting workplace.
- The sexual harassment policy will be successfully applied when all staff are treated on merit by their managers, by peers, by direct reports and by all other team members.

Process

- Committee:
 - A Committee has been constituted by the Management to consider and redress complaints of Sexual Harassment. The Chairman and Members of the Committee are as follows:

Mrs. Prachi Ajmera	- Presiding Officer/Chairperson
Ms. Shweta Rathor	- Member
Mr. Dinesh Mutha	- Member
Ms. Hima Doshi	- External Member
Ms. Vaishali Bhamat	- Member
Mr. Sunil Shah	- Member
Mr. Vinay Parekh	- Member

Concerned Administrative Officer from Branch –

Invitee Member

- A quorum of 3 members is required to be present for the proceedings to take place. The quorum shall include the Chairperson, at least two members, one of whom shall be a lady.
- Making a Complaint:

If you believe you are being, or have been, harassed, follow the procedure below:

 - Inform the offender the behaviour is offensive, unwelcome, and against company policy and should stop (only if you feel comfortable enough to approach them directly)
 - Keep a record of the incident(s)

- If the unwelcome behaviour continues, contact your supervisor or manager for support
- If this is inappropriate, you feel uncomfortable, or the behaviour still persists, you / close family/ friend, but not being a legal representative shall contact Human Resource Representative or HR Head in writing with his/her signature within 10 days of occurrence of incident to the HR Head who in turn will inform the committee about the matter
- The Committee Member will maintain a register to endorse the complaint received by it and keep the contents confidential, except to use the same for discreet investigation. The Committee will hold a meeting with the Complainant within five days of the receipt of the complaint, but no later than a week in any case.

➤ Receiving a Complaint:

When a manager / committee receives a complaint, he/she should follow the procedure below:

- Listen to the complaint seriously
- Treat the complaint confidentially
- Allow the complainant to bring another person / witness / evidence to the interview if he/she chooses to, but no legal personal shall be allowed to represent the victim
- Ask the complainant for the full story, including what happened step by step
- Take notes, using the complainant's own words
- Ask the complainant to check your notes to ensure your record of the conversation is accurate and sign off.
- Explain and agree next action with the complainant if investigation is not requested
- A copy of the complaint will be shared with the alleged / accused to reply within 10 days, and reply if not sought within the period defined, then post 3 reminders in next 3 days shall be given, and if no replies are received, it shall be deemed that the complaint has been accepted by the accused
- Act promptly
- Maintain confidentiality
- Pass your notes on to your manager
- If investigation is requested, or is appropriate, follow the procedure outlined
- Investigating a Complaint

When investigating a complaint, he/she should follow the procedure below:

- Interview all directly concerned, separately
- Interview witnesses, separately
- Keep records of interviews and investigation, daily order sheet to be maintained / minutes
- Do not assume guilt
- Interview the alleged harasser, separately and confidentially
- Let the alleged harasser know exactly what he/she is being accused of
- Give him/her a chance to respond to the accusation
- Listen carefully and record details
- Ensure confidentiality, minimize disclosure
- Determine appropriate action based on investigation and evidence collected
- Check to ensure the action meets the needs of the complainant and company
- The Committee shall complete the "Enquiry" within reasonable period but not beyond 90 days and communicate its findings and its recommendations for action to the Head of HR. The report of the

- committee shall be treated as an enquiry report on the basis of which an erring employee can be awarded appropriate punishment straightaway
- The HR – Head will direct appropriate action in accordance with the recommendation proposed by the Committee
- If resolution is not immediately possible, the complainant should be referred to senior management
- If the resolution requires the authority of senior management, the complainant should be referred to the appropriate level
- Outcomes as they affect the complainant should be discussed with the complainant to ensure that needs are met, where appropriate
- In the event, the complaint does not fall under the purview of Sexual Harassment or the complaint does not mean an offence of Sexual Harassment, the same would be dropped after recording the reasons thereof
- In case the complaint is found to be false, the Complainant shall, if deemed fit, be liable for appropriate disciplinary action by the Management
- In case the complaint is found to be justified, the complainant may be entitled to any or all of the potential outcomes.

Potential Outcomes:

If the complaint is found to be justified, the complainant may be entitled to any or all of the following:

The complainant may receive:

- Private apology (verbal or written)
- Re-credit of any leave taken due to the harassment
- payment of medical and counselling expenses
- Transfer, with no job disadvantage
- Other compensation

In case the complaint is found to be false, the Complainant shall, if deemed fit, be liable for appropriate disciplinary action by the Management

The Harasser may receive:

- Depending on the severity of the case, consequences can include an apology, counselling, transfer, dismissal, demotion or other forms of disciplinary action
- Immediate disciplinary action will also be taken against anyone who victimizes or retaliates against a person who has complained of sexual harassment

Other Points to be considered:

The Committee shall analyse and put up report on all complaints of this nature at the end of the year for submission to:

- The Committee may recommend to the Director action which may include transfer or any of the other appropriate disciplinary action
- The management shall provide all necessary assistance for the purpose of ensuring full, effective and speedy implementation of this policy
- Where sexual harassment occurs as a result of an act or omission by any third party or outsider, TPC shall take all steps necessary and reasonable to assist the affected person in terms of support and preventive

action

- The Committee shall analyse and put up report on all complaints of this nature at the end of the year for submission to Director - HR
- In case the Committee finds degree of offence coverable under the Indian Penal Code, then this fact shall be mentioned in its report and appropriate action shall be initiated by the Management, for making a Police Complaint
