

PREVENTION OF SEXUAL HARASSMENT (POSH)

The company is committed to providing a work environment that is free from all forms of harassment, discrimination and conduct that can be considered harassing, discriminatory, coercive, or disruptive. The company condemns and prohibits harassment of an individual based on gender, race, color, ethnicity, national origin, ancestry, age, religion, physical or mental disability, sexual orientation, pregnancy, veteran status, citizenship, or any other characteristic protected by law.

Definitions and Interpretations:

“Act” means the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013.

“Employee” means a person employed at a workplace on a regular, temporary, ad hoc or daily wage basis, either directly or through an agent, including a contractor, with or without the knowledge of the principal employer, whether for remuneration or not, or working on a voluntary basis or otherwise, whether the terms of employment are express or implied and include a co-worker, a contract worker, probationer, trainee, apprentice or called by any other such name.

The “workplace” includes, but is not limited to:

- All offices or premises where the Company’s business is conducted.
- All company-related activities performed at any other site away from the company’s premises.
- Any social, business or other events organized by the company.

“Harassment” includes, but is not limited to:

- Verbal harassment such as comments that are offensive or unwelcome regarding a person’s nationality, origin, race, color, religion, gender, sexual orientation, age, body, disability or appearance, including epithets, slurs and negative stereotyping.
- Non-verbal harassment such as distribution, display or discussion of any written or graphic material that ridicules, denigrates, insults, belittles or shows hostility, aversion or disrespect toward an individual or group because of national origin, race, color, religion, age, gender, sexual orientation, pregnancy, appearance, disability, and sexual identity, marital or other protected status.

“Sexual Harassment” can be of two types:

- “Quid pro quo” harassment, where submission to harassment is used as the basis for employment decisions. Employee benefits such as raises, promotions and better working hours are directly linked to compliance with sexual advances. Therefore, only someone in a supervisory capacity (with the authority to grant such benefits) can engage in quid pro quo harassment. Examples: A supervisor promising an employee a raise if she goes on a date with him; a manager telling an employee she will fire him if he does not have sex with her.
- “Hostile work environment,” where the harassment creates an offensive and unpleasant working environment. A hostile work environment can be created by anyone in the work environment, whether it is supervisors, other employees or customers. Hostile environment harassment consists of verbiage of a sexual nature, unwelcome sexual materials or even un-welcome physical contact as a regular part of the work environment. Texts, e-mails, cartoons or posters of a sexual nature; vulgar or lewd comments or jokes; or unwanted touching or fondling all fall into this category.

Sexual harassment occurs when unsolicited and unwelcome sexual advances, requests for sexual favours, or other verbal or physical conduct of a sexual nature:

- Is made explicitly or implicitly a term or condition of employment.
- Is used as a basis for an employment decision.
- Unreasonably interferes with an employee's work performance or creates an intimidating, hostile or otherwise offensive environment.

Sexual harassment may take different forms. The following examples of sexual harassment are intended to be guidelines and are not exclusive when determining whether there has been a violation of this policy:

- Verbal sexual harassment includes innuendoes, suggestive comments, jokes of a sexual nature, sexual propositions, lewd remarks and threats; requests for any type of sexual favor (this includes repeated, unwelcome requests for dates).
- Nonverbal sexual harassment includes the distribution, display or discussion of any written or graphic material, including calendars, posters and cartoons that are sexually suggestive or show hostility toward an individual or group because of sex; suggestive or insulting sounds; leering; staring; whistling; obscene gestures; content in letters and notes, facsimiles, e-mail, photos, text messages, tweets and Internet postings; or other form of communication that is sexual in nature and offensive.
- Physical sexual harassment includes unwelcome, unwanted physical contact, including touching, tickling, pinching, patting, brushing up against, hugging, cornering, kissing and fondling and forced sexual intercourse or assault.

Internal Committee:

To prevent instances of sexual harassment and to receive and effectively deal with complaints pertaining to the same, an "Internal committee" was formed in accordance with The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013.

Objective:

- To provide protection against sexual and other forms of harassment in the workplace.
- To create a mechanism for redressal of complaints.
- To provide safeguards against false or malicious charges.
- To provide a secure working environment for employees.

Current Composition:

- Ms. Harshada Sawant - Presiding Officer for Blenheim Chalcot (9892715808)
- Ms. Riddhi Moghe (8291924967)
- Ms. Reshma Kannan (9920908669)
- Mr. Rohit Sareen (9820462082)
- Ms. Nazima Shaikh (9769164821)
- Ms. Aakanksha Ahuja (9833280842)
- Ms. Sneha Khandekar – External Member (9819770166)
- Ms. Mairi-Claire Tay (+447966785660)

Filing a complaint:

An employee or applicant who experiences, witnesses, or is aware of an incident of possible sexual or other improper harassment, should report it within a period of **3 months** from the date of the incident to any of the members of the Internal Committee via email to icc@blenheimchalcot.com.

Provided that where such a complaint cannot be made via email, the Presiding Officer or any Member of the Internal Committee shall render all reasonable assistance to the Aggrieved Individual for making the

complaint in writing.

Receiving a Complaint (guidelines):

Dealing with incidents of harassment is not like any other type of dispute. Complainants may be embarrassed and distressed and it requires tact and discretion while receiving the complaint.

The following points are kept in mind by the receiver of the complaint:

- Complaints are listened to, and the complainant informed that the receiver of the complaint takes the concerns seriously. The complainant is informed that their concerns will be reported to the appropriate committee and follow-up will be done speedily.
- Situations are not being pre-judged. Written notes are taken while listening to the person. When taking accurate notes, complainant's own words, where possible, are used. A clear description of the incident in simple and direct terms shall be prepared and details are confirmed with the complainant.
- All notes shall be kept strictly confidential. Aggrieved Individual's agreement shall be taken to allow proceeding with the matter, which involves a formal inquiry.
- The Aggrieved Individual shall be advised that although the process shall be confidential, the Respondent shall be informed, and any witnesses and persons directly involved in the complaint process will also learn of the complainant's identity.
- Care shall be taken to prevent any disadvantage to or victimization of either the Aggrieved Individual or the Respondent.

Resolution procedure through conciliation:

Once the complaint is received by the Committee, before initiating the inquiry the committee may take steps to conciliate the complaint between the Aggrieved Individual and the Respondent. This is only if requested by the Aggrieved Individual.

It is made clear to all parties that conciliation doesn't necessarily mean acceptance of complaint by the Respondent. It is a practical mechanism through which issues are resolved or misunderstandings cleared.

In case a settlement is arrived at, the Committee shall record & report the same to the Employer for taking appropriate action. Resolution through conciliation happens within 2 weeks of receipt of complaint.

The Committee provides copies of the settlement to the Aggrieved Individual & Respondent. Once the action is implemented, no further inquiry shall be conducted.

Inquiry of the complaint:

On learning of possible sexual or other improper harassment, the Internal Committee (IC) shall meet and thoroughly enquire about the allegations. If the investigation determines that improper conduct has occurred in violation of this policy, the company will take immediate and appropriate corrective action, as per the Act, to end the conduct and prevent future improper conduct, and will take any other appropriate remedial measures. This may include suspension of any employee found to have engaged in improper conduct, up to and including termination of employment.

Malicious Allegations:

If the investigation determines that the allegations against the respondent were malicious or the Aggrieved Individual or any other person making the complaint has made the complaint knowing it to be false or the Aggrieved Individual or any other person making the complaint has produced any forged or misleading document, it may recommend to the Company to take action against the Aggrieved Individual or the person making the complaint as per the Act.

Confidentiality:

To the extent possible, the allegations, the investigation, and the results of the investigation will be kept confidential. Therefore, disclosure of facts and information will be limited to those whose participation is necessary to thoroughly investigate the allegations and implement the appropriate corrective action. Any information that possible sexual or other improper harassment has occurred will be investigated and remedied, despite an employee or applicant's request to the company for not doing it.

Also, in relation to the specific protection of women in the workplace, the Vishaka Guidelines against Sexual harassment at Workplace as laid down by the Honorable Supreme Court, in the case of Vishaka and Others vs. State of Rajasthan and Others (JT 1997 (7) SC 384) which shall be adhered to.

Appeal:

Any party not satisfied or further aggrieved by the implementation or non-implementation of recommendations made, may appeal to the appellate authority in accordance with the Act and rules, within 90 days of the recommendations being communicated.