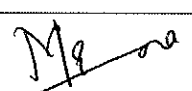
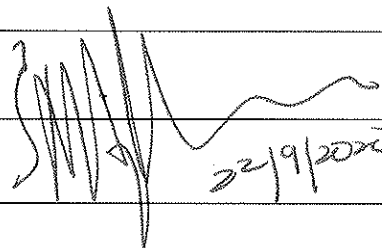
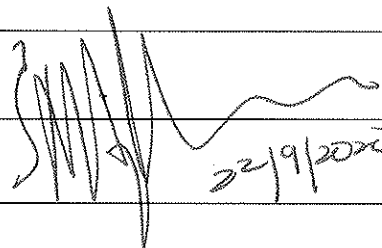


PURAVANKARA LIMITED
Quality Management System

**POLICY TO PROVIDE PROTECTION AGAINST SEXUAL
HARASSMENT IN WORKPLACE**

QMS/PL/26	Date: 15-09-2020	REV.NO.05
Prepared by	Team Business Process	
Approved by	Head – BO&P	Ms Minol R Ajekar 
Issued by	Head – BO&P	Ms Minol R Ajekar  22/9/2020

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Amendment Sheet

DATE	CHANGE DESCRIPTION	REF	PG.NO	NEXT ISSUE / REV.NO
	BASELINE	Companies Act 2013	ALL	REV.NO.00
14.02.2019	Entire document was revised based on the requirement.	Companies Act 2013	ALL	REV.NO.01
14.02.2019	Name of external ICC member is included	Companies Act 2013	Page 10	REV.NO.02
27.01.2020	List of ICC members is maintained separately	Companies Act 2013	Page 10	REV.NO.03
27.07.2020	Format of Policy, clause 2 All the annexures are maintained separately. Amendment sheet is included	Companies Act 2013, amendment 2019	ALL	REV.NO.04
15.09.2020	Quarterly and Annual reporting added	Companies Act 2013, amendment 2019		REV NO. 05

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1 Purpose:

At Puravankara Group, it is our desire to promote a healthy and congenial working environment irrespective of gender, caste, creed or social class of the employees. We value every individual and are committed to protect the dignity and respect of every individual. Therefore, we have zero-tolerance for sexual harassment against employees and any act of sexual harassment will invite serious disciplinary action. The Policy to provide protection against sexual harassment in workplace (hereinafter referred to as the 'Policy') is being rolled out to educate all employees about what conduct constitutes sexual harassment against an employee, to provide protection against sexual harassment of employees at workplace and for prevention and redressal of complaints and for matters connected and incidental thereto.,

The policy is made under the overall ambit of the Puravankara Limited Governance and particularly in accordance with the law which has come into force being, The Sexual Harassment of Women and Workplace (Prevention, Prohibition and Redressal) Act, 2013 and the Rules framed thereunder. Notwithstanding, anything contained in this Policy the provisions of the Act and the Rules made thereunder shall apply and in the unlikely event of there being a conflict between the Policy and the Act in the application of the provisions or interpretation thereof the Act and Rules framed thereunder will supersede. While the law is directed towards women only, this policy will also cover Sexual Harassment towards our male employees.

2 Who is covered under Sexual Harassment Policy at Puravankara?

This Policy is applicable to:

- Every employee across the companies formed from time to time and existing, - permanent, temporary, on training, on contract, consultant, an employee or anybody who happens to be in the workplace and alleges to have been subjected to an act of sexual harassment;
- An alleged act of sexual harassment, whether the incident has occurred during or beyond office hours;
- An alleged act of sexual harassment, whether sexual harassment has taken place within outside the company premises.

Any act of sexual behavior is included if such an act is perceived to be detrimental to a healthy and congenial work environment. This policy is only applicable when both or either the alleged harasser & the victim is employees / agents / Contractor/ Consultant of the company. It is not applicable when both the alleged harasser & the victim are third parties.

3 Definition of Sexual Harassment

"Sexual Harassment against employee" is any unwelcome sexually determined behavior, such as: physical contact and advances; a demand or request for sexual favors; whether verbal, textual, graphic, electronic or by any other action, sexually colored remarks, showing pornography; and any other unwelcome physical, verbal or non-verbal conduct of sexual nature.

This includes verbal, non-verbal or physical conduct such as obnoxious comments or utterances, remarks or jokes, letters, phone calls, SMS or emails, gestures, showing pornography, stalking, sounds or display of a nature with sexual overtures. It also includes a demand or request for sexual favors in return

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for with a promise of work related favors such as performance appraisals, promotions, transfers, salary increases and employment or any other form of reward or recognition.

Acts of sexual behavior which may arise out of coercion ranging from pressure for personal favors to sexual favor as a 'quid-pro-quo', intrusion into the private lives, etc. or that which may lead to hostile working condition may also be considered as a form of sexual harassment.

The Definitions and other references which has been set out in the prevailing law will be applicable in the context, unless specifically defined in this Policy.

3.1 Basic Definitions:

- Complainant: The person reporting an incident of Sexual Harassment
- Victim: The person subjected to Sexual Harassment.
- Alleged Harasser: The person who is alleged / reported to have committed an act of Sexual Harassment

3.2 Complaints Committee(s):

In accordance with Supreme Court Guidelines, the Company has formed a Core Complaints Committee and Zonal Complaints Committees (please see **Annexure A** for constitution and roles and responsibilities) which will manage the process of enquiry and redressal of sexual harassment complaints.

The location of the Core Complaints Committee and the Zonal Complaints Committees is provided below:

3.3 Core Complaints Committee:

Is responsible for the group and any issues arising out of overseas operations, including locations abroad and at subsidiary and associate companies.

Names of the members of the Core Complaints Committee along with their contact details are provided in **Annexure B**. The Human Capital Department will periodically update the list of names and contact details of the members.

4 Contact Details in case of an incident of sexual harassment

An employee may send a written complaint either to the Core Complaints Committee. The employee may also email the complaint to: **icc@puravankara.com**

The employee may also contact his / her Team Manager, Manager - Human Capital, Ethics Counselor or any other employee. Upon being intimated and authorized, the Team Manager or the HC Manager or the Ethics Counselor or any other employee shall send an email communication to the Complaints Committee, providing all the necessary details of the Complaint. The Victim must be copied on such emails. The complaint should include with contact details of the complainant / victim such as name, address, contact number, department etc. In both the cases above, the written complaint / email must provide the details of the incident together with the name/s of, the alleged harasser/s and the victim/s, as available.

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The complaint may be filed within three months from the date of the alleged incident and in case of series of incidents within three months from the date of the last incident.

5 Enquiry process

Depending upon the nature of the Complaint, the Core Complaints Committee may direct that an enquiry be conducted by an Investigating Committee constituted by the Core Complaints Committee. The Complaints Committee may not order an enquiry, if examination of witnesses / documents is not necessary to arrive at an amicable conclusion. In either case, the Complaints Committee shall provide an opportunity to the victim as well as the alleged harasser to represent their position and provide their explanations.

The victim and the alleged harasser need to go through the Guidelines for the Complaints / Investigation Committee as per this Policy and Act, to better understand their rights and the procedure to be adopted by the Complaints / Investigation Committee.

In the event an enquiry is found to be necessary, the following procedure shall be adopted by the Committee:

- An enquiry is initiated through the members of the investigating committee
- Discussions are conducted with the complainant, victim and alleged harasser as required
- Written record of all discussions are to be maintained by the committee
- Inquiry findings are to be submitted to the Core Complaints Committee
- Core Complaints Committee will study findings and present the decision and the recommended action thereon to the Senior Designated Management Person (SDMP) i.e. Chairperson of ICC
- The SDMP will clarify with the complaints committee on the recommendation and HC will implement the same.
- Chairperson will keep board updated via Company Secretary.

The final decision shall be communicated to the victim and the alleged harasser in the both the instances above through an online platform or any appropriate channel. The member of core IC Committee is in-charge of reporting and administration of online Platform.

During the pendency of an enquiry on a written request from the victim the Committee as appropriate, may recommend to the employer to transfer the victim or the alleged harasser to any other workplace within the Company or holding companies to any other location and/or grant leave to the victim or alleged harasser up to a period of three months.

Note:

Puravankara will exercise utmost care in treating the entire process with the dignity, sensitivity and respect its merits including protection of the victim / harassed

Any act of sexual behavior, if noticed by any third party may be brought to the notice of the committee or the management. Such acts may be considered as harassment, if quid pro quo or hostile work environment conditions prevail. Otherwise, it could be treated as non-professional behavior at the workplace and may be dealt with by the company outside the purview of this policy.

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The Company will provide counselor services to the victim / harassed on request, at no additional cost to the victim/ harassed.

The intent of this policy is to create a harmonious & safe working environment. To ensure that this is upheld in both letter and spirit, we urge employees to desist from referring false or malicious complaints which also will be dealt with seriously.

As stated above the Policy will also be guided and be applied in consonance with The Sexual Harassment of Women and Workplace (Prevention, Prohibition and Redressal) Act, 2013 and the Rules framed thereunder.

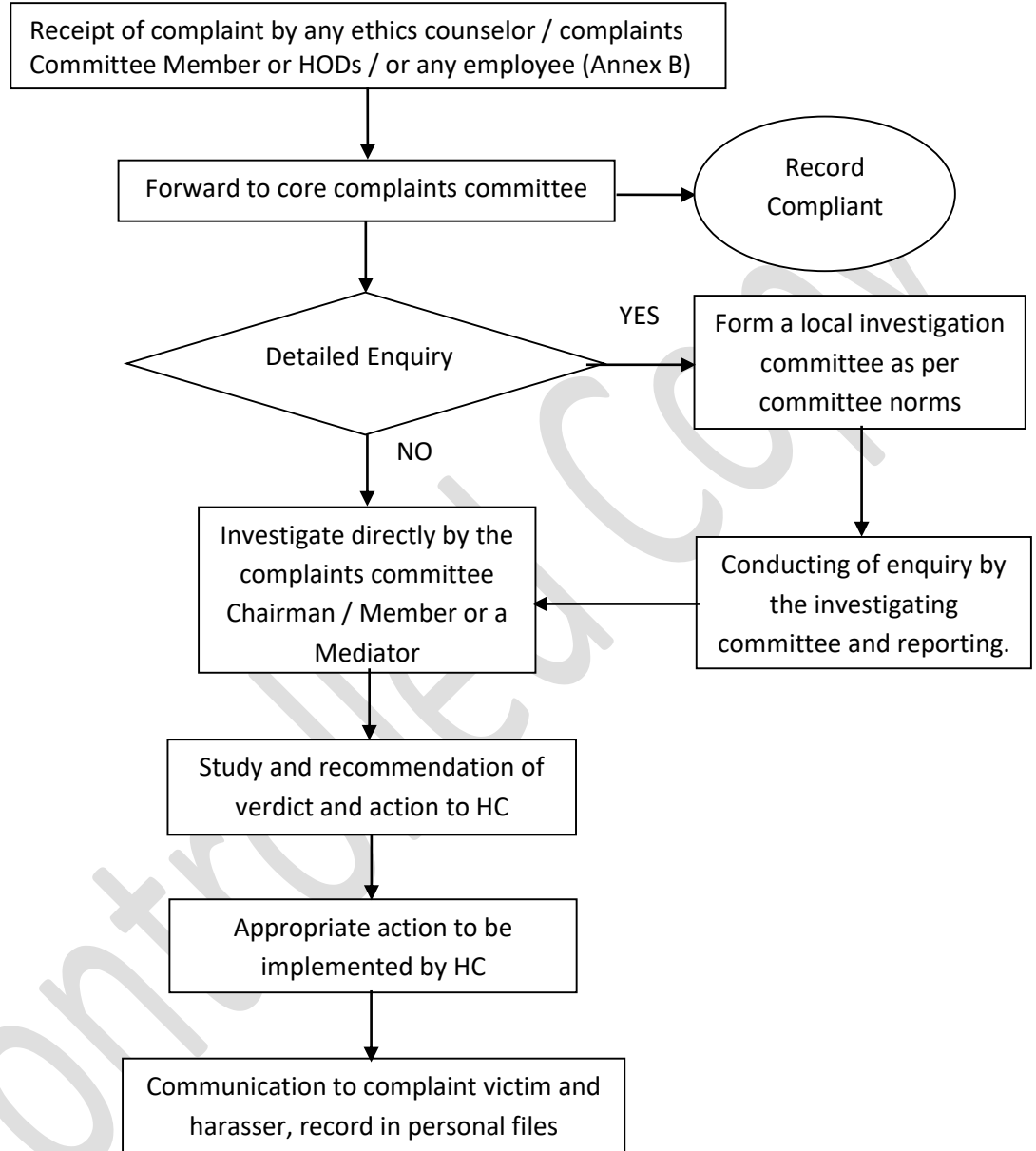
Notwithstanding anything contained in the Right to Information Act 2005, the contents of complaints made, the identity and address of the aggrieved employee, harasser and witnesses, any information relating to conciliation and inquiry proceedings, recommendations of the internal complaints committee and the action taken by the employer under the provisions of Act will not be published, communicated or made known to public, press and media in any manner.

Information may be disseminated regarding the justice secured to any victim of sexual harassment under this Act without disclosing the name, address, and the identity of the aggrieved employee.

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6 Process flow for redressal of complaints with respect to sexual harassment



If the findings are rejected by complaints committee the same will be sent back to investigating committee to amend and send within one week days are indicative and may vary in some cases depending on the nature of the case.

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7 Other Definitions

7.1 Appeal

If either party desires to appeal the decision he / she may appeal in writing to the SDMP, who shall decide the appeal within one month

7.2 Third party harassment:

Any harassment brought to the notice of the company arising out of an act or omission by any third party or an outsider, Puravankara will take necessary and reasonable steps in assisting the affected person in terms of support and preventive action.

7.3 Victimization / Retaliatory Action:

Every manager or supervisor must contact Complaints Committee members immediately upon receiving a complaint and be alert to any possible retaliatory actions. The victim may directly communicate with members of the Complaints Committee or any other superior officers, in case of any suspected retaliatory action. In case of any possibility of retaliatory action, the Complaints Committee must preferably transfer the alleged harasser or victim to avoid victimization. Complaints Committee shall make efforts to protect interests of the victim from victimization.

7.4 Guidelines for the Complaints / Investigation committee

- To notify in writing the time and dates of the meetings to be held, to the complainant, victim and the alleged harasser.
- A copy of the statement of complaint to be given to the alleged harasser with reasonable time to study the same prior to appearing before the committee appointed for this purpose
- Enquiry to be conducted in a neutral location which provides an environment conducive for both the victim and alleged harasser.
- Both the parties may be allowed to bring in a colleague for specific advice and support. However, the same shall not be allowed if it causes undue delay or disrupts the committee proceedings
- Appropriate recordings of each enquiry sitting and observations shall be made by the committee members.
- During the process of investigation, the Company will ensure no further harassment or victimization happens to either the victim or the alleged harasser and duties are carried out as normal. The Company will also ensure that there is no proximity at work place between the victim and the alleged harasser, during the pendency of the Complaint. Necessary work arrangements, including transfer, if necessary, will be made by the Company for this purpose.
- The conclusion of the findings and report to be handed over to the SDMP of complaints committee, who will study and communicate the verdict to HC.
- Conclusion of the findings will also be informed to both the parties concerned.
- The above action of receiving, identifying investigation committee, investigations and reporting

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should be completed within 50 days.

8 Possible Disciplinary Actions arising out of the Recommendations

- A letter of warning that will be placed in the personal file of the harasser.
- Immediate transfer or suspension without pay or both.
- Fine equivalent to 2-4 months' salary that can be credited to a fund created to be utilized for the welfare of the employees.
- Stoppage of increment with or without cumulative effect.
- Reduction in rank.
- Termination / dismissal from the services of the Company.
- Any other action that the Disciplinary Authority may deem fit.
- Filing a Complaint before the relevant police station/ Court.

9 Roles and Responsibilities:

9.1 Employees

- Are encouraged to familiarize themselves with the key elements of the policy and should:
- Abstain from committing any acts which amount to sexual harassment at the workplace.
- Report incidents of sexual harassment without fear or favor.
- Create an environment of conduciveness for co-workers to work together without fear of harassment.
- Get clarifications from Human Capital / Ethics counselors whenever in doubt.

9.2 HOD's and Managers

- Provide appropriate working conditions in respect of work, leisure, health and ensure there is no hostile environment in the work place.
- Provide appropriate lighting and safety in factory, corridors and other office spaces where employees move about during their working.
- Report any complaint or grievance immediately to the concerned authorities.
- Ensure there is no retaliation or retribution happening at the workplace where the supposed action is to have taken place.
- Implement the disciplinary action along with HC.
- Ensure that issues pertaining to sexual harassment are discussed periodically during the meetings. During such meetings, relevant details such as the brief outline of this Policy, the details of the members of the Complaints Committee shall also be discussed.

9.3 Human Capital Department

- Conduct necessary communication and training across the company, with respect to sexual harassment at the workplace.
- Ensure this policy is communicated explained and handed over at the time of induction of every

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employee.

- Any act of sexual harassment to be notified as misconduct under the Standing orders of the company.
- Provide sufficient security at the entry as well as the exit points and in cases where women employees are transported from and to the work place working in late shift hours.
- Provide appropriate medical and separate rest room facilities for female employees.
- Keep separate vehicles ready to meet emergency situations such as hospitalization whenever there is a case of injury or harassment etc.
- Clarify to employees on any queries related to this policy, wherever required.
- Maintain records of all the Sexual Harassment cases and findings.
- Clarify with complaints committee on the recommendation and implement the same after getting confirmation from ICC and communicate to MD and Management the action to the concerned stakeholders

9.4 Designated Senior Management Person

Ensure that this policy is communicated through appropriate channels (Human Capital etc.)

- Recommend actions to be taken along with Complaints Committee.
- Ensure implementation of this policy in line with overall guidelines.
- Ensure appropriate training is provided to members of the Complaints Committee (s) including training on gender sensitivities.
- Form the Core Complaints Committee and location committees. Hold periodic meetings.
- Communicate quarterly / or more frequently if required to the Board.
- Submit Quarterly Report to Board of Directors with status of Complaints for the Quarter.
- Submit Annual Report to District Officer with relevant details as per Companies Act.

9.5 Managing Director

Consider and dispose of appeals, within a period of thirty (30) days and communicate the decision to the parties concerned.

9.6 Power to make rules and Amendments

The power to amend rules pertaining to sexual harassment at workplace vests with the Board of Directors of Puravankara Limited. Any changes to these rules shall be suitably communicated to all the employees.

Place: Bangalore
Date:

Puravankara Limited
Minol Ajekar
Head -Operations & Processes
Designated Senior Management Person



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10 Constitution and Role of Complaints Committee:

10.1 Constitution of Complaints Committee

- a. The Company shall have an Internal Complaints Committee comprising 10 members.
- b. The Complaints Committee shall be chaired by a woman of adequately higher Designation and will be known as Senior Designated Management Person. In the event the perpetrator is senior to the Chairperson of the Complaints Committee, a senior woman officer, who is senior to the perpetrator in rank and post, shall be co-opted as Chairperson for that case. In case there is no senior woman officer available in the workplace, an eminent woman who may not be an employee of the Company, shall be co-opted as Chairperson for that case.
- c. Not less than half of the members of the Complaints Committee shall be women.
- d. The Complaints Committee shall appoint / co-opt a nominee from an NGO or any other person who is familiar with the subject of sexual harassment, as a third party member.
- e. The Complaints Committee is established in Company's office for inquiring into complaints of sexual harassment shall be deemed to be the Inquiring Authority appointed by the Disciplinary Authority and the Complaints Committee shall hold the inquiry in accordance with the procedure laid down in these Rules.
- f. For any complaints pertaining to other Office locations, Regional or Corporate office, separate Complaints Committee/s may be constituted by the Core Complaints Committee.
- g. Changes in the constitution of the Complaints Committee, whenever necessary, shall be made as expeditiously as possible and in any case within 15 days of the date of vacancy of office by one of the members.

10.2 Functions and Powers of the Complaints Committee.

- I. The Complaints Committee shall organize programmes for the gender sensitization of executives and employees through workshops, seminars, etc. It may take the assistance of specialized NGO, etc., if necessary, for this purpose.
- II. The Complaints Committee shall converse once a quarter, even if there is no live case, and review preparedness to fulfill all requirements of the Vishaka judgment in the Company.
- III. The quorum for meeting / hearing shall be 2/3rd of the members of the Complaints Committee. However, this shall not be a pre-requisite for the quorum of an adjourned meeting.
- IV. The Chairperson of the Complaints Committee shall have veto power.
- V. The minutes of every meeting shall be recorded in the form of Report for the said case.
- VI. The Complaints Committee shall have power and jurisdiction for conducting an inquiry and have the powers
 - to summon witnesses and documents;
 - to recommend transfer and/or suspension;
 - to recommend penalties as per Service Rules of the company.
 - Complaints Committee shall submit its Report to the Disciplinary Authority for further

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necessary action.

- At every Zonal Complaints Committee investigation, a member from the Core Complaints will be present.

Complaints Committee may form Complaints Sub-Committee for the purposes of enquiry investigation.

11 Quality Records

- List of Core Committee Members – Annexure B
- Checklist for reporting findings – Annexure C
- Quarterly Report – Annexure D
- Annual Report – Annexure E

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