

GODREJ HOUSING FINANCE LIMITED

Anti-Sexual Harassment Policy

Objective

This policy has been prepared for and notified at the Company *interalia*:

- (a) to prevent, deter and prohibit the occurrence or commission of any form of Sexual Harassment at the Workplace and/or any Retaliatory Conduct,
- (b) to provide a robust mechanism for reporting any incidents of Sexual Harassment at the Workplace and for speedy and fair redressal of the same in accordance with the law, and
- (c) to ensure that strict action is undertaken against the perpetrators of Sexual Harassment at the Workplace.

It is in accordance with the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and rules thereunder.

Applicability

This policy is applicable to all Employees of the Company in India, as defined in *Clause 2.3*.

Key highlights

1. In line with the Godrej values, Godrej Housing Finance Limited (the “Company”) is committed towards creating a safe and dignified working environment and culture free from any form of Sexual Harassment, exploitation or intimidation, and has a zero-tolerance policy towards any Sexual Harassment at the Workplace. **The Employees of the Company are strictly prohibited from engaging in any form of Sexual Harassment at the Workplace**
2. Even persons who are not Employees of the Company, such as customers, clients, stakeholders, visitors, outsiders, etc., are covered by this policy, and can file a complaint as an Aggrieved Person, if they are subjected to any Sexual Harassment at the Workplace by an Employee of the Company.
3. This policy is intended to be gender neutral, and not limited to women only. In other words, persons of any and all genders, gender identities, and sexual orientation can file a complaint as an Aggrieved Person if they are subjected to any Sexual Harassment at the Workplace by an Employee of the Company.
4. The Company shall, by a written order, constitute internal committees (each an “Internal Committee” or “IC”) for each of its offices, units, premises, factories, and branches, to conduct an Inquiry into a complaint of Sexual Harassment at the Workplace.
5. A Complainant may submit the complaint of Sexual Harassment, to the IC, within 3 months from the date of the incident and in case of a series of incidents, within a period of 3 months from the date of the last incident. The IC may, for reasons to be recorded in writing, extend the aforesaid time period by a maximum of 3 more months, if it is satisfied that circumstances were such which prevented the Complainant from making a complaint within the original 3 month period.
6. The Company and the IC will take all reasonable measures to ensure that any person who has lodged a complaint under this policy or given evidence or other assistance as part of an Inquiry under this policy, in good faith, is protected and not subjected to any Retaliatory Conduct.

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Section 1

1. Introduction: Commitment to prevent Sexual Harassment at the Workplace

- 1.1. At the Godrej group, we respect the human rights of every individual. We do not discriminate on the basis of gender, sexual orientation, gender identity, religion, political opinion, nationality, race, colour, social origin and status, indigenous status, disability, age, or any other personal characteristic or status. We do not tolerate disrespectful or inappropriate behaviour, harassment, intimidation or unfair treatment, or retaliation of any kind.
- 1.2. In line with the Godrej values, Godrej Housing Finance Limited (the “**Company**”) is committed towards creating a safe and dignified working environment and culture free from any form of Sexual Harassment, exploitation or intimidation, and has a zero-tolerance policy towards any Sexual Harassment at the Workplace. **The Employees of the Company are strictly prohibited from engaging in any form of Sexual Harassment at the Workplace.**
- 1.3. This policy has been prepared and for and notified at the Company *interalia*:
 - (a) to prevent, deter and prohibit the occurrence or commission of any form of Sexual Harassment at the Workplace and/or any Retaliatory Conduct,
 - (b) to provide a robust mechanism for reporting any incidents of Sexual Harassment at the Workplace and for speedy and fair redressal of the same in accordance with the law, and
 - (c) to ensure that strict action is undertaken against the perpetrators of Sexual Harassment at the Workplace.
- 1.4. This policy has been prepared in accordance with the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and rules thereunder (collectively the “**Act**”) and should be read along with the Act and other applicable laws. Nothing contained in this policy shall prevent any victim of Sexual Harassment to seek any additional recourse available under civil or criminal law, as in force from time to time.
- 1.5. This policy is applicable to all Employees of the Company in India, as defined in *Clause 2.3*.
- 1.6. This policy may be further amended by the Company from time to time, and any such amended policy will be duly notified in writing by the Company.

Section 2

2. Some key definitions

- 2.1. **“Aggrieved Person”** in relation to a Workplace, means a person of any age, gender or sexual orientation, whether an Employee or not, who alleges to have been subjected to any act of Sexual Harassment by an Employee of the Company.

Explanation:

- (a) *Even persons who are not Employees of the Company, such as customers, clients, stakeholders, visitors, outsiders, etc., are covered by this policy, and can file a complaint as an Aggrieved Person, if they are subjected to any Sexual Harassment at the Workplace by an Employee of the Company.*
 - (b) *This policy is intended to be gender neutral, and not limited to women only. In other words, persons of any and all genders, gender identities, and sexual orientation can file a complaint as an Aggrieved Person if they are subjected to any Sexual Harassment at the Workplace by an Employee of the Company.*
- 2.2. **“Complainant”** means an Aggrieved Person (and/or any person on behalf of the Aggrieved Person as permitted under *Clause 4.1* read with *Annexure 1* of this policy), filing a complaint under this policy, alleging Sexual Harassment at the Workplace.
- 2.3. **“Employee”** means a person employed with or engaged by the Company for any work on a regular, temporary, ad hoc, daily wage basis or part-time 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 includes a co-worker, consultant, contract worker, probationer, trainee, apprentice, intern or called by any other such name.
- 2.4. **“Employer”** means the person(s) responsible for the management, supervision and control of the Company, including responsible for formulation and administration of this policy at the Company, and for the purposes of this policy, acting through the Chief Executive Officer and Chief Human Resources Officer of the Company.
- 2.5. **“Respondent”** means an Employee against whom a Complainant has made a complaint of Sexual Harassment under this policy.

2.6. “Sexual Harassment”

- A. Sexual Harassment includes any one or more of the following unwelcome acts or behaviours (whether directly and/or indirectly and/or by implication):
- (a) physical contact and/or advances;
 - (b) a demand, request or offer for sexual favours;
 - (c) making (or sharing) sexually coloured remarks, gestures or sounds, including but not limited to teasing, epithets, innuendos, jokes, pranks, comments of a sexual nature, whether generic or about a person and/or their body or clothing, sexual orientation, sexual prowess, or other expressions which have a sexual connotation/overtone;
 - (d) showing, displaying or sharing pornography, erotic or obscene material or content including images, pictures, posters, screensavers, objects, gifts, signs or other material of a sexual nature or having a sexual connotation;
 - (e) sexual advances of any kind involving verbal, non-verbal, or physical conduct, whether implicit or explicit, including staring;
 - (f) repeatedly asking to socialise after work hours, or following or contacting/attempting to contact a person repeatedly to foster personal interaction; despite a clear indication of disinterest by such person;
 - (g) asking questions about another person’s sexual conduct, or sexual orientation, or volunteering information about the sexual conduct of oneself or others; and/or
 - (h) any other unwelcome physical, verbal or nonverbal conduct, communication or behaviour, of sexual nature.

Explanation:

Any of the aforesaid acts, conduct or behaviours will, for the purposes of this policy, amount to Sexual Harassment, irrespective of whether such act, conduct or behaviour was committed:

- (a) in written, printed, graphic, verbal, gestural, audio-visual, virtual, electronic, or other forms,*
- (b) in person, or when working from home, or through any mode or channel of communication including phone calls, audio or video calls/meetings, virtual spaces, technology platforms and applications, texts, instant messaging, emails, through social media, social networking websites/applications or otherwise.*

- B. Further, the following circumstances, among other circumstances, if it occurs or is present in relation to or connected with any act or behaviour of Sexual Harassment (as defined in (A) above), may also amount to Sexual Harassment for the purposes of this policy:
- (a) implied or explicit promise of preferential treatment in the Aggrieved Person’s employment;
 - (b) implied or explicit threat of detrimental treatment in the Aggrieved Person’s employment;
 - (c) implied or explicit threat about the Aggrieved Person’s present or future employment status;
 - (d) interference with the Aggrieved Person’s work or creating an intimidating or offensive or hostile work environment; and/or
 - (e) humiliating treatment likely to affect the Aggrieved Person’s health or safety.

Explanation:

Sexual Harassment may occur even in the absence of the circumstances listed in (B) above.

2.7. **“Workplace”** includes:

- (a) offices, factories, units, branches, warehouses or any other premises established, owned or controlled by the Company;
- (b) places visited by an Employee arising out of or during the course of employment or engagement with the Company, including guest-houses of the Company;
- (c) off-sites, events or programs (whether business or social or otherwise) organised or attended, by or on behalf of the Company; and/or
- (d) transportation provided by the Employer for undertaking any journey or travel for the purposes of (b) and/or (c) above.

Section 3

3. Constitution of Internal Committees

3.1. Constitution of ICs

The Company shall, by a written order, constitute internal committees (each an “**Internal Committee**” or “**IC**”) for each of its offices, units, premises, factories, and branches, to conduct an Inquiry into a complaint of Sexual Harassment at the Workplace. The membership of the ICs shall be in accordance with the provisions set out in *Annexure 2* of this policy. **The members of the ICs along with their contact details are listed in Annexure 2 of this policy.** The ICs shall abide by the obligations and duties as prescribed under all applicable laws, the Act and this policy including *interalia* as provided in *Annexure 3* of this policy.

3.2. Statutory Powers

The Act has vested the ICs with certain powers that a civil court has under the Code of Civil Procedure, 1908. Accordingly, the IC shall be vested with the powers of: (a) summoning and enforcing the attendance of any person, and examining him/her/them on oath, and (b) requiring the discovery and production of documents; as are provided to a civil court under the Code of Civil Procedure, 1908.

3.3. When the Aggrieved Person is not a woman, the IC shall act in the capacity of an internal disciplinary committee of the Company (and not in its capacity as a statutory authority as stipulated under the Act); and all provisions of this policy, other than the provisions of *Clause 3.2*, shall continue to apply to such cases.

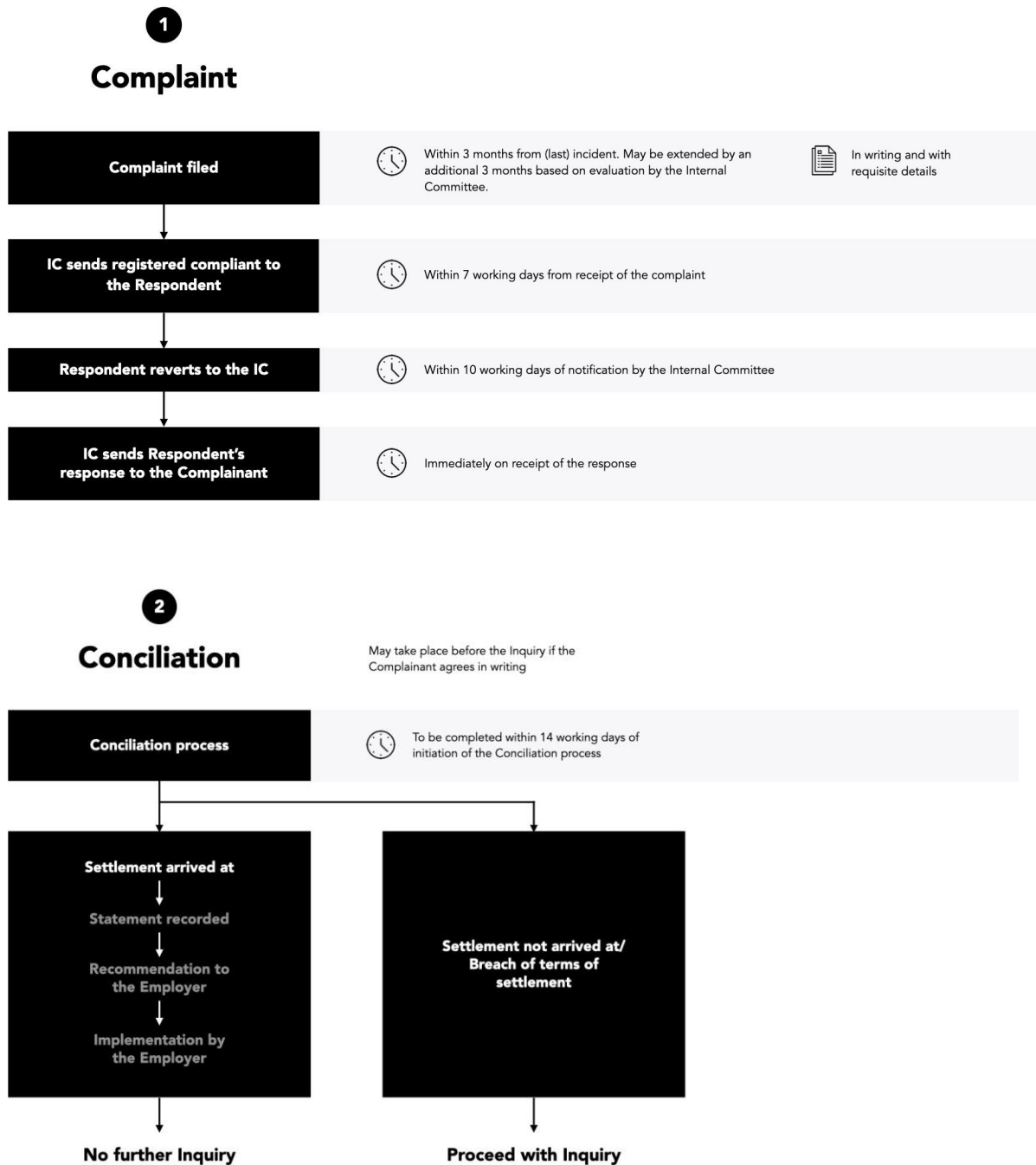
3.4. Anti Sexual Harassment Apex Committee

The Anti Sexual Harassment Apex Committee for Godrej Industries and its associate companies will oversee the constitution, operations and management of the individual ICs. **The members of the Apex Committee along with their contact details are listed in Annexure 2 of this policy.**

Section 4

4. Inquiry and Redressal Process

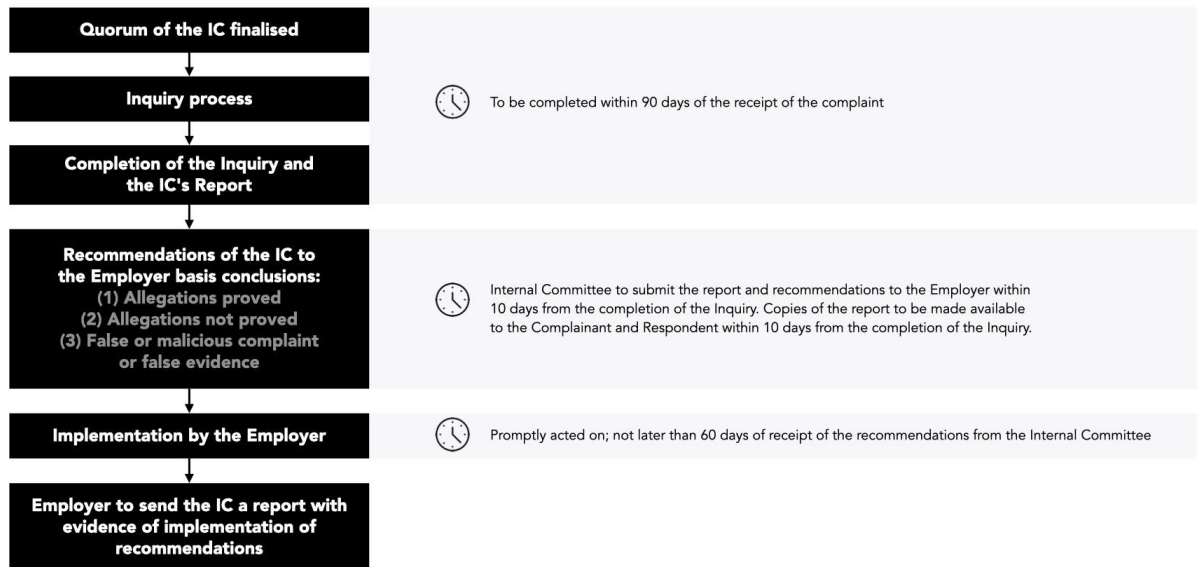
Illustration: The steps in the Inquiry and Redressal Process



3

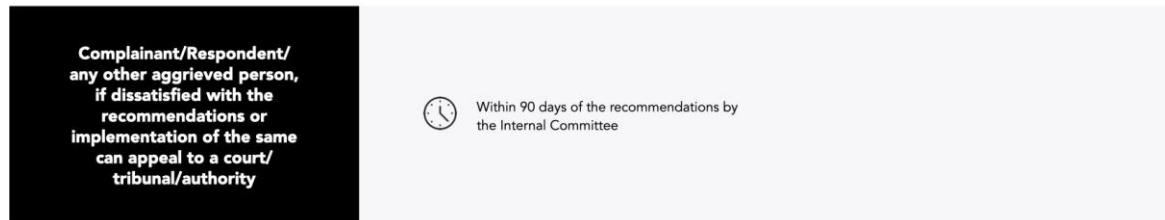
Inquiry

Takes place if conciliation not done/settlement not arrived at/Breach of terms of Settlement



4

Appeal



Filing of a complaint

- 4.1. A complaint can be made by an Aggrieved Person and in certain special circumstances (i.e., in case of physical incapacity, mental incapacity, death or otherwise as provided in *Annexure 1* this policy) by the persons stipulated in *Annexure 1* of this policy.

The complaint should be submitted in writing or through email or through the CONDUCT online platform, to the IC. In case the Complainant makes an oral complaint to the IC and is unable to make a written complaint, any member of the IC shall render all reasonable assistance to the Complainant for making the complaint in writing.

Along with the complaint, the Complainant must submit supporting documents and information, and the name and details of the Respondent, and names and addresses of the witnesses, if any.

4.2. **Timeline for filing complaints**

A Complainant may submit the complaint of Sexual Harassment, to the IC, within 3 months from the date of the incident and in case of a series of incidents, within a period of 3 months from the date of the last incident. The IC may, for reasons to be recorded in writing, extend the aforesaid time period by a maximum of 3 more months, if it is satisfied that circumstances were such which prevented the Complainant from making a complaint within the original 3 month period.

In the exceptional context of complaints beyond the period of the additional 3 months, the circumstances for delay will be evaluated by the IC and complaint routed as per their recommendations.

4.3. **Copy to Respondent and their response**

On receipt of the complaint, the IC shall send 1 copy of the complaint (and other supporting documents, information, other details, etc., submitted by the Complainant to it) to the Respondent within 7 working days.

The Respondent shall file his/her/their reply to the complaint along with any supporting documents, information, and names and addresses of witnesses (if any), within a period of 10 working days from the date on which the Respondent received the copy of the complaint from the IC.

A copy of the response so received from the Respondent (along with supporting documents, information, other details, etc.) should be shared by the IC, with the Complainant, immediately.

4.4. **Whistleblower**

Any Employee with knowledge of an incident of Sexual Harassment may notify the Whistleblowing Officer of the Company by sharing details of the Aggrieved Person, the person engaging in Sexual Harassment, and any other relevant details. The contact details of the Whistleblowing Officer is listed in *Annexure 2* of this policy.

Conciliation

4.5. Initiation of Conciliation

Before initiating an Inquiry, the IC may, at the written request of the Aggrieved Person take steps to settle the matter between the Aggrieved Person and the Respondent through Conciliation. However, no monetary settlement shall be made a basis of such Conciliation. In case the parties are willing to conciliate, the IC shall take all reasonable steps to endeavour to complete the Conciliation within a period of 14 working days from the commencement of Conciliation proceedings.

4.6. Settlement

Where a mutual settlement has been arrived at in accordance with *Clause 4.5* above, the IC shall record the settlement in writing. Copies of the recorded settlement will be provided by the IC to the Aggrieved Person and the Respondent, and forwarded to the Employer to take action as specified in the recommendation of the IC.

4.7. No further Inquiry

Where a settlement has been arrived at in accordance with *Clauses 4.5 and 4.6* above, no further Inquiry shall be conducted by the IC. Having said that, if the Aggrieved Person informs the IC that any term or condition of the settlement has been breached or has not been complied with by the Respondent, the IC shall proceed to make an Inquiry into the complaint.

Inquiry Process

4.8. Initiation of Inquiry

In case:

- (a) the Aggrieved Person does not opt for Conciliation, or
- (b) the Aggrieved Person opted for Conciliation, but no settlement is reached through Conciliation, or
- (c) any term or condition of the settlement (arrived at after Conciliation) is breached or not complied with by the Respondent;

the IC shall proceed to conduct an Inquiry into the complaint.

4.9. Manner of conducting Inquiry into the complaint

The IC shall conduct the Inquiry into the complaint in accordance with all applicable laws, including the Act and this policy, and shall follow and adhere to the principles of natural justice. This *interalia* includes giving both parties (and their witnesses) an opportunity of being heard and to present their case; allowing both parties an opportunity to cross examine/ask questions (whether directly or put through the IC) to the other side and the witnesses; providing both parties a copy of the findings (and giving them an opportunity to make representation against the same); providing both parties a copy of the findings, recommendations and the final report of the IC; and making a reasoned report.

The IC shall ensure that the respect and dignity of all parties concerned is maintained during the proceedings and that the proceedings are conducted in a manner so as to ensure freedom of expression and in an atmosphere free of intimidation and free of victimisation.

The Inquiry shall be conducted in the presence of a minimum of 3 members of the IC including the Presiding Officer.

The Complainant or the Respondent shall not be allowed to bring in any legal practitioner to represent them in their respective case, at any stage of the proceedings before the IC.

4.10. Action during pendency of Inquiry

During the pendency of the Inquiry, on a written request made by the Complainant, the IC may recommend to the Employer any of the following:

- (a) transfer of the Aggrieved Person or the Respondent to any other workplace of the Company; and/or
- (b) grant leave to the Aggrieved Person for up to a period of 3 months (such leave will be in addition to any other leaves such person would otherwise be entitled to); and/or
- (c) restrain the Respondent from reporting on the work performance of the Aggrieved Person or writing the confidential report of the Aggrieved Person, and assign the same to another officer.

Explanation:

These are intended to be temporary measures that may be recommended by the IC, while the Inquiry is ongoing, in the interests of physical and/or physiological safety and comfort of the parties to the Inquiry. Upon receiving the recommendations from the IC, the Employer shall implement the recommendations made and send a report of such implementation to the IC.

4.11. Termination of proceedings/Ex parte order

The IC shall have the right to terminate the Inquiry proceedings or to give an ex parte decision, in writing, on the complaint, if either of the Complainant or the Respondent fails, without sufficient cause, to present themselves for 3 consecutive hearings before the IC. However, such termination or ex parte order may not be passed without giving a written notice, 15 days in advance, to the party concerned.

Completion of Inquiry and IC's Report

4.12. Timeline for completion of Inquiry

The Inquiry by the IC is required to be completed within 90 days of the receipt of the complaint.

4.13. Where allegations are not proved

Upon completion of the Inquiry, if the IC arrives at a conclusion that the allegation(s) against the Respondent has not been proved, then it shall recommend to the Employer, in writing, that no action is required to be taken in the matter.

4.14. Where allegations are proved

Upon completion of the Inquiry, if the IC arrives at the conclusion that the allegation(s) against the Respondent has been proved it shall recommend, in writing, to the Employer to take action against the Respondent, which may *inter alia* include:

- (a) issuance of written warning;

- (b) seeking a written apology;
- (c) reprimand or censure;
- (d) withholding of increments or promotion;
- (e) termination from service;
- (f) undergoing counselling session;
- (g) carrying out community service; and/or
- (h) taking action for Sexual Harassment as a misconduct as may be prescribed under applicable laws (including service rules if any), internal policies of the Company and/or the terms of the contract with the Respondent.

4.15. Action for false or malicious complaint or false evidence

Where the IC arrives at a conclusion that:

- (a) the allegation made by the Complainant against the Respondent is malicious, or
- (b) the Complainant has made the complaint knowing it to be false, or
- (c) the Complainant, Respondent, or any witness has produced any false evidence, forged or misleading document or false testimony, it may recommend to the Employer to take one or more of the following actions against the Complainant, Respondent or witness, as the case may be:
 - (i) issuance of written warning;
 - (ii) seeking a written apology;
 - (iii) reprimand or censure;
 - (iv) withholding of increments or promotion;
 - (v) termination from service;
 - (vi) undergoing counselling sessions;
 - (vii) carrying out community service; and/or
 - (viii) taking such action as may be prescribed under applicable laws, internal policies of the Company and/or the terms of the contract with the said person;

provided that a mere inability to substantiate a complaint or provide adequate proof need not attract action against the Complainant.

The findings mentioned in *Clause 4.15* above shall be established after an Inquiry in accordance with the process prescribed before any action is recommended by the IC to the Employer in this regard.

4.16. Timeline for Report by the IC

The IC shall submit a reasoned report in writing with its findings and recommendations (as per *Sub Clauses 4.13 to 4.15* above as applicable), to the Employer (with copies to the Complainant and the Respondent) within 10 days from the date of completion of the Inquiry.

4.17. Implementation by the Employer

Upon receipt of the recommendations of the IC (as provided above) the Employer shall promptly act upon and implement the same, and in any case no later than 60 days of receipt of the same. The Employer will also send a report evidencing implementation of such recommendations to the IC.

Appeal

- 4.18. In the event the Complainant, Respondent, or any other person is aggrieved as per the scenarios provided in Section 18 of the Act including by any finding and/or the recommendations of the IC and/or the non-implementation of the recommendation(s) made by the IC, he/she/they may appeal to the Appellate Authority, within a period of 90 days of the recommendations.

For the purposes of this policy, the Appellate Authority shall be the court, tribunal or authority, as may be prescribed under applicable laws, from time to time, for the purposes of filing of an appeal under the provisions of applicable laws including the Act.

Section 5

5. Other Provisions

Confidentiality

- 5.1. The contents of the complaint made, the identity and addresses of the Complainant, the Respondent and witnesses, any and all information relating to Conciliation and Inquiry proceedings, findings and recommendations of the IC and the action taken by the Employer as per the provisions of the Act and this policy shall not be published, communicated or made known to the public, press and media in any manner. If this provision is contravened, the Employer shall be entitled to take all steps to secure confidentiality, take all actions in accordance with the law, the Act, the Company's policies and/or provisions of the contract with such person, for such breach and also recover from such person such sum as penalty as may be prescribed thereunder.

However, information may be disseminated regarding the justice secured to any victim of Sexual Harassment without disclosing the name, address, identity or any other particulars, which may lead to the identification of the Aggrieved Person, Respondent, the Complainant, and witnesses.

Non Retaliation

- 5.2. (a) The Company and the IC will take all reasonable measures to ensure that any person who has lodged a complaint under this policy or given evidence or other assistance as part of an Inquiry under this policy, in good faith, is protected and not subjected to any Retaliatory Conduct.
- (b) If any person reporting, or testifying, or involved in the proceedings and/or Inquiry under this policy including implementation of the IC report (such as Complainant, Respondent, witness, IC member, or otherwise) experiences any form of retaliation or victimisation in the nature of *inter alia* intimidation, discrimination, pressure to withdraw from or not participate in the process, inducement to withdraw or alter their statements against their will, undue influence, threats, coercion, or any form of hostile work environment for their reporting, testifying, participating in the proceedings hereunder including implementation (hereinafter referred to as "**Retaliatory Conduct**"), then such person should promptly report the same to the IC. Any Retaliatory Conduct by an Employee violates this policy and other the Company policies, and will result in appropriate disciplinary Inquiry and action thereunder.

Obligations of the Employees

- 5.3. The Employees of the Company shall abide by the obligations and duties as prescribed under all applicable laws, the Act and this policy including as provided below:
- (a) Familiarise themselves with the Act and this policy;
 - (b) Not encourage, engage, abet or participate in any act or behaviour that may amount to Sexual Harassment, and/or Retaliatory Conduct against any person; and

- (c) Fully cooperate with the IC in any Inquiry or proceedings undertaken by the IC pursuant to this policy.

Obligations of the Human Resources team members of the Company

- 5.4. The Human Resources team members of the Company shall abide by the obligations and duties as prescribed under all applicable laws, the Act and this policy including *interalia* as provided in *Annexure 4* of this policy.

Obligations of the Company

- 5.5. The Company shall perform its obligations and duties as prescribed under all applicable laws, the Act, and this policy including *interalia* as provided in *Annexure 5* of this policy.

Section 6

Annexure 1: Persons who can file a complaint on behalf of an Aggrieved Person

1. In case the Aggrieved Person is unable to make a complaint on account of his/her/their physical incapacity, a complaint may be filed, with the written consent of the Aggrieved Person, by:
 - (a) his/her/their relative or friend; or
 - (b) his/her/their co-worker; or
 - (c) (where the Aggrieved Person is a woman) an officer of the National Commission for Women or State Women's Commission; or
 - (d) any person who has knowledge of the incident.
2. In case the Aggrieved Person is unable to make a complaint on account of his/her/their mental incapacity, a complaint may be filed by:
 - (a) his/her/their relative or friend; or
 - (b) a Special Educator; or
 - (c) a qualified psychiatrist or psychologist; or
 - (d) the guardian or authority under whose care the Aggrieved Person is receiving treatment or care; or
 - (e) any person who has knowledge of the incident jointly with (i) the Aggrieved Person's relative or friend or (ii) a Special Educator or (iii) a qualified psychiatrist or psychologist, or (iv) guardian or authority under whose care the Aggrieved Person is receiving treatment or care.

For the purposes of this policy, "**Special Educator**" means a person trained in communication with people with special needs in a way that addresses their individual differences and needs.

3. In case the Aggrieved Person for any other reason is unable to make a complaint, a complaint may be filed by any person who has knowledge of the incident, with the Aggrieved Person's written consent.
4. In case of death of the Aggrieved Person, a complaint may be filed by any person who has knowledge of the incident, with the written consent of Aggrieved Person's legal heir(s).

Annexure 2: Membership of the ICs

1. Each Internal Committee shall comprise of the following members, to be nominated by the Company:
 - (a) a presiding officer of the IC ("**Presiding Officer**") who shall be a woman employed at a senior level at the workplace from amongst the employees of the Company. Where a senior level woman employee is not available, the Presiding Officer shall be nominated from other offices or administrative units of the Company.
 - (b) a minimum of 2 members from amongst the employees of the Company preferably committed to the cause of women, or who have had experience in social work or have legal knowledge; and
 - (c) 1 member from amongst non-governmental organisations or associations committed to the cause of women or a person familiar with the issues relating to Sexual Harassment.
2. For each IC, at least one-half of its total members, shall be women.
3. Subject to *Clauses 4 to 6* of this Annexure, the Presiding Officer and every member of an IC shall hold office for such period, as may be specified by the Company in writing in accordance with the Act.
4. In case the Presiding Officer or any other member of an IC ceases to be employed or engaged, with the Company, then such person's nomination on the IC shall also automatically be ceased or vacated.
5. A Presiding Officer or any other member of an IC may resign at any time by tendering his/her/ their resignation in writing to the Company.
6. Where the Presiding Officer or any other member of an IC:
 - (a) contravenes the requirements of the Act or this policy;
 - (b) breaches any confidentiality obligations stipulated in applicable laws, this Act and/or this policy;
 - (c) has been convicted for an offence or an Inquiry into an offence under any law for the time being in force is pending against him/her/them;
 - (d) has been found guilty in any disciplinary proceedings or a disciplinary proceeding is pending against him/her/them; and/or
 - (e) has abused his/her/their position as to render their continuance in office prejudicial to public interest;such Presiding Officer or IC member as the case may be, shall be removed from the IC.
7. Any vacancy created in an IC (including on account of *Clauses 4 to 6* of this Annexure) shall be filled by a fresh nomination and written order by the Company. Such nomination shall be made as expeditiously as possible and in any case within 7 days of the date of the vacancy.
8. In accordance with the provisions of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and rules thereunder, and the Company's Anti Sexual Harassment Policy; the Company has, vide board resolution constituted the IC for the Company's offices to *inter alia* inquire into complaints of Sexual Harassment at the Workplace.

IC Member and Whistleblowing Officer details

IC Members for Godrej Housing Finance

All Locations

IC Member	Contact details
Ms. Anuja Bhate, Head HR–Presiding Officer	anuja.b@godrejcapital.com
Ms. Monika Gupta, Chief of Staff–Prime Home Loans	monika.gupta@godrejcapital.com
Ms. Shobha Puttaswamy	shobha.puttaswamy@godrejcapital.com
Mr. Sandip Barmera	sandip.barmera@godrejcapital.com
Mr. Kostubh Singh	kostubh.singh@godrejcapital.com
Mr. Deepak Gupta	deepak.gupta@godrejcapital.com
Ms. Raheen Jummani (External member)	raheenjummani@gmail.com

Anti Sexual Harassment Apex Committee Members for Godrej Industries and associate companies

IC Member	Contact details
Nisaba Godrej (Executive Chairperson, Godrej Consumer Products Limited)	nisaba.godrej@godrejcp.com
Sumit Mitra (Head - Group HR and Corporate Services, Godrej Industries Limited)	su.mitra@godrejinds.com
Divya Murthy (Head- Group Legal, Godrej Industries Limited)	divya.murthy@godrejinds.com
Vandana Scolt (Head – Leadership Development and Employer Brand, Godrej Industries Limited) () - Coordinator	vandana.scolt@godrejcp.com

Whistleblowing Officer

Whistleblowing Officer	Contact details
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Annexure 3: Duties of the ICs

The ICs shall perform their duties as prescribed under all applicable laws, the Act, and this policy, including *interalia* as set out below:

- (a) Comply with all applicable laws, the provisions of Act, and this policy.
- (b) Conduct the Inquiry into complaints relating to Sexual Harassment in a fair, diligent and expeditious manner.
- (c) Formulate programmes for the spread of awareness of the policy among the management and employees of the Company.
- (d) Keep a record of all complaints received and the actions taken by the IC and the Employer thereon.
- (e) Comply with all reporting and filing requirements as may be prescribed under applicable laws and the Act, from time to time.
- (f) Maintain confidentiality of the IC proceedings, including any and all information in relation to the contents of the complaint, the identity and addresses of the Complainant, Respondent and witnesses, the Conciliation and Inquiry proceedings, findings and recommendations of the IC, the action taken by the Company, etc.

Annexure 4: Duties of the Human Resources team members

The Human Resources team members shall:

- (a) Familiarise themselves with all applicable laws, this policy and all other internal policies, procedures, and codes at the Company.
- (b) Fully cooperate with the IC in any Inquiry or proceedings undertaken by the IC pursuant to this policy.
- (c) Take steps to educate the Employees about this policy and create awareness in this regard.
- (d) If approached by any person to report any instance of alleged Sexual Harassment at the Workplace or any violation of this policy, immediately direct such person to the respective IC.
- (e) Maintain due confidentiality of all information in accordance with the requirements of the law, the Act and this policy.
- (f) Provide necessary assistance and information to the IC for dealing with the complaint and conducting the Inquiry.

Annexure 5: Duties of the Company

The Company shall:

- (a) Provide a safe working environment at the Workplace, which shall include safety for persons coming into contact at the Workplace, and providing a safe working environment free from Sexual Harassment.
- (b) Display at conspicuous places in the Workplace and widely disseminate this policy, the penal consequences of Sexual Harassment, and the written order constituting the respective IC(s) which shall include the names and contact details of all the members of the respective IC.
- (c) Review at regular intervals and for any change and modification in the IC members and duly notify in writing.
- (d) Organise at regular intervals (i) workshops and awareness programmes for sensitising the Employees with the provisions of the Act and this policy and (ii) orientation programmes and seminars, capacity and skill-building and training programmes, for the members of the ICs.
- (e) Provide necessary facilities, assistance and information to the IC for dealing with the complaint and conducting the Inquiry.
- (f) Assist in securing the attendance of Respondent and witnesses before the IC.
- (g) Make available such information to the IC as it may require having regard to the complaint of Sexual Harassment.
- (h) Provide assistance to the Aggrieved Person if he/she/they so choose(s) to file a complaint or FIR in relation to the offence under the Indian Penal Code 1860 or any other law for the time being in force.
- (i) Cause to initiate action, under the Indian Penal Code 1860 or any other applicable law, against the perpetrator, or if the Complainant so desires, where the perpetrator is not an Employee, in the Workplace at which the incident of Sexual Harassment took place (and provide all reasonable assistance to the affected person including assistance in filing a complaint under the Indian Penal Code, 1860 (or other applicable laws).
- (j) Treat Sexual Harassment as misconduct under the service rules and internal policies and initiate action for such misconduct.
- (k) Monitor the timely submission of reports by the IC and ensure compliance with all applicable laws and this policy.
- (l) Widely disseminate this policy for prohibition, prevention and redressal of Sexual Harassment at the Workplace, intended to promote gender sensitive safe spaces and remove underlying factors that contribute towards a hostile work environment against any person.
- (m) Comply with the reporting requirements under all applicable laws including the Companies Act 2013, and as prescribed under Section 21 and 22 of the Act and submit annual reports to the respective District Officers (as specified under the Act) in a form and comprising details as required under the Act.

Section 7

Frequently Asked Questions

1. I think I have faced Sexual Harassment at the Workplace. What should I do?

Please immediately approach a member of the Internal Committee (also known as the IC) of the Company, and submit a written complaint to them. Details of the Internal Committee members are available in *Annexure 2* of the Anti Sexual Harassment policy document and are also displayed at all the Company's offices/premises.

2. Can all employees file complaints against Sexual Harassment at the Workplace? Or is this only meant for women employees?

This Anti Sexual Harassment policy is intended to be gender neutral, and not limited to women only. In other words, persons of any and all genders, gender identities, and sexual orientation can file a complaint as an Aggrieved Person if they are subjected to any Sexual Harassment at the Workplace by an employee of the Company.

An Employee as defined in this policy means a person employed with or engaged by the Company for any work on a regular, temporary, ad hoc, daily wage basis or part-time 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 includes a co-worker, consultant, contract worker, probationer, trainee, apprentice, intern or called by any other such name.

Even persons who are not Employees of the Company, such as customers, clients, stakeholders, visitors, outsiders, etc., are covered by this policy, and can file a complaint as an Aggrieved Person, if they are subjected to any Sexual Harassment at the Workplace by an Employee of the Company.

3. Is there a time limit within which I should file the complaint with the Internal Committee?

The Complainant should file the complaint within 3 months from the date of the incident and in case of a series of incidents, within a period of 3 months from the date of the last incident. If you have missed this time limit, let the Internal Committee members know. If they are convinced of the reasons why the timeline was missed, they can decide to extend the time period by a maximum of 3 additional months.

In the exceptional context of complaints beyond the period of the additional 3 months, the circumstances for delay will be evaluated by the IC and complaint routed as per their recommendations.

4. Is there a format for submitting the complaint?

No. There is no format for filing the complaint. Please write out your complaint in detail and provide all relevant information about the incident, including the name and details of the person against whom you wish to file the complaint, and name and details of any witnesses. Please also provide supporting documents/information (if any) that may support your complaint.

If you are unable to write out the complaint, let the Internal Committee know. They will arrange for assistance to be provided to you, for making the complaint in writing.

5. How will I get to know if a Complainant has filed a complaint against me under the Anti Sexual Harassment Policy?

Within 7 working days of receipt of a complaint against you, the Internal Committee will share a copy of the complaint (and other supporting documents, information, other details, etc., submitted by the Complainant) with you.

You will then get 10 working dates to submit your written response in detail and provide all relevant information, including name and details of any witnesses. Please also provide supporting documents/information (if any) that may support your response.

6. Will the complaint be handled confidentially?

Yes, the entire proceedings under the Anti Sexual Harassment Policy are to be kept strictly confidential. For example, the contents of the complaint, the identity of the parties, information relating to the proceedings, the report of the Internal Committee, and the action taken by the Employer cannot be made public, and will be handled with strict confidentiality as per the process noted in the policy. Violation of confidentiality can lead to penalties as provided in the policy.

7. How do we ensure there isn't any retaliation against a Complainant or witnesses?

Any retaliation against any person who has participated in or been involved in any proceedings under the Anti Sexual Harassment Policy is strictly prohibited, and if anyone faces any Retaliatory Conduct, it should be immediately reported to the Internal Committee.

Retaliatory Conduct includes intimidation, discrimination, pressure to withdraw from or not participate in the Internal Committee process, inducement to withdraw or alter their statements against a person's will, undue influence, threats, coercion, or any form of hostile work environment against a person for their reporting, testifying, participating in the proceedings under the Anti Sexual Harassment Policy. Retaliatory Conduct can lead to disciplinary inquiry and action against the person engaging in or committing such conduct.

8. Does the Internal Committee listen to both sides?

Yes, the Internal Committee is required to conduct the inquiry in a fair and unbiased manner, in accordance with all applicable laws and the Anti Sexual Harassment Policy. They are specifically required to follow the principles of natural justice, which in simple words means that both parties

will be given an opportunity of being heard, to present their respective case, evidence and witnesses, ask further questions, and to go through the documents/evidence filled by the other side.

9. Is either party allowed to bring their lawyer to the Inquiry?

No, this is not permitted this is not permitted under law and the Anti Sexual Harassment Policy.

10. How long will the Inquiry process take? Will we get a copy of the report of the Internal Committee?

The Internal Committee is required to complete the Inquiry within 90 days of receipt of the complaint. Within 10 days of the completion of the Inquiry, they will submit their report (with findings and recommendations) along with reasons, to the Employer for implementation. Both parties will get a copy of the report.

11. What happens once the Inquiry is complete and the Internal Committee has issued its report?

The Internal Committee's report contains its findings and recommendations, and the Employer is required to act upon and implement the same within 60 days of the report.

12. I am aware of an incident of Sexual Harassment that has taken place at the Workplace. Can I report it, even though it doesn't involve me?

If you have any knowledge of an incident of Sexual Harassment, you may notify the Whistleblowing Officer of the Company by sharing details of the Aggrieved Person, the person engaging in Sexual Harassment, and any other relevant details. The contact details of the Whistleblowing Officer is listed in *Annexure 2* of the Anti Sexual Harassment Policy.