

# **Policy on Prevention of Sexual Harassment (POSH) at the Workplace**

For K Raheja Corp Real Estate Pvt. Ltd.

## **Policy on Prevention of Sexual Harassment (POSH) at the Workplace**

### **Overview**

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| <b>Approving Authority</b> | Board of Directors of K Raheja Corp Real Estate Private Limited (Formerly known as Feat Properties Private Limited)   |
| <b>Approval Date</b>       | 11 April 2025   |
| <b>Effective Date</b>      | This Policy on Prevention of Sexual Harassment (POSH) at the Workplace ("POSH Policy" or "Policy") shall come into effect from the date it was adopted by the Board of Directors at their Board Meeting held on 11 April 2025 |

### **Purpose**

K Raheja Corp Real Estate Private Limited (KRCREPL) ("The Entity") desires to uphold a healthy and congenial working environment that enables employees to work without fear of prejudice, gender bias and sexual harassment.

### **Scope**

This Policy has been approved and adopted by the Board of Directors and is applicable to the Entity. This Policy is applicable to all employees of K Raheja Corp Real Estate Private Limited (KRCREPL) across all locations.

### **Definitions**

**"Applicable Law"** means any statute, law, regulation, ordinance, rule, judgement, order, decree, by-law, approval of any Governmental Agency, directive, guideline, policy, requirement or other government restriction or any similar form of decision of or determination by, or any interpretation having the force of law of any of the foregoing Governmental Agency having jurisdiction, applicable to any Party, in force from time to time, including but not limited to the Residential Real Estate regulations.

**"Board of Directors"** shall mean the Board of Directors of the K Raheja Corp Real Estate Private Limited.

**"Employee"** shall include Regular Employees, Directors and Consultants at the Registered Office as well as the Branch Offices/Projects/Site Offices.

**"Entity"** shall mean K Raheja Corp Real Estate Private Limited.

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### **A. Introduction**

# K Raheja Corp Real Estate Private Limited

(formerly known as Feat Properties Private Limited)



We, at K Raheja Corp Real Estate Private Limited (KRCREPL), value every employee and are committed to protect the dignity and respect of each employee. We have 'zero tolerance' for sexual harassment and any act of sexual harassment will invite serious disciplinary action.

This Policy aims to inform the employees about what conduct constitutes sexual harassment and in the unlikely chance of such an occurrence, to enable a fair mechanism for dealing with such misconduct through regular trainings and awareness sessions.

## B. Policy Coverage

'Sexual Harassment' is any unwelcome sexually determined behavior (whether directly or by implication), such as:

- ✓ Physical contact and advances
- ✓ A demand or request for sexual favours; whether verbal, textual, graphic, electronic or by any other action.
- ✓ Sexually coloured remarks
- ✓ Showing pornography
- ✓ Any other unwelcome physical, verbal or non-verbal conduct of sexual nature whether by words, gestures or actions

The definition of sexual harassment shall include any harassment caused to female or male employees. It would also include harassment caused to or by either gender.

## C. Complaints Redressal Committee

The Internal Complaints Committee (ICC) comprising of appropriate members as required under 'The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013' has been constituted to consider and redress complaints of Sexual Harassment. The Internal Complaints Committee (ICC) shall submit reports in the format prescribed on a quarterly basis.

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| Chairperson/Presiding Officer | Ms. Manisha Gupta<br>Email ID: <a href="mailto:mgupta@kraheja.com">mgupta@kraheja.com</a><br>Contact: 09820973455  |
| Member                        | Ms. Neetu Shukla<br>Email ID: <a href="mailto:neetu.shukla@kraheja.com">neetu.shukla@kraheja.com</a><br>Contact: 09819593315                                       |
| Member                        | Mr. Govardhan Gedela<br>Email ID: <a href="mailto:ggedela@kraheja.com">ggedela@kraheja.com</a><br>Contact: 09987540334   |
| Member                        | Ms. Hiral Motta<br>Email ID: <a href="mailto:hmotta@kraheja.com">hmotta@kraheja.com</a><br>Contact: 08591070077  |
| Member                        | Ms. Ameeta Aziz Parpia, Advocate (External Committee Member)<br>Email ID: <a href="mailto:ameeta@ahparpiaco.com">ameeta@ahparpiaco.com</a><br>Contact: 09820433857 |

CIN: U40300MH2007PTC287012

**D. Complaint Process**

- i. Any employee who feels being sexually harassed directly or indirectly may submit a complaint of the alleged incident to any member of the Internal Complaints Committee (ICC) in writing with his/her signature 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.
- ii. In the event where the victim has approached/communicated to anybody else other than the Internal Complaints Committee (ICC), then that person is required to inform only to the committee immediately and no one else without any delay. He or she should also ensure that confidentiality of the incident/victim is maintained and not disclosed to anybody else.
- iii. The Internal Complaints Committee (ICC) will hold a meeting with the Complainant within a week of the receipt of the complaint. Thereafter, the person against whom complaint is made may be called for a deposition before the Committee and an opportunity will be given to him/her to give an explanation, where after, an "Enquiry" shall be conducted and concluded.
- iv. The Internal Complaints Committee (ICC) shall immediately proceed with the Enquiry and communicate the same to the Complainant and person against whom complaint is made.
- v. In the event, the complaint does not fall under the purview of Sexual Harassment, or the complaint does not constitute an offence of Sexual Harassment, the same would be dropped after recording the reasons thereof.
- vi. In order to ensure that this important matter is not trivialized, any complaint which, in the opinion of the Internal Complaints Committee (ICC), is deliberately false or frivolous would be viewed very seriously.
- vii. The Internal Complaints Committee (ICC) shall complete the Enquiry within a period of 90 days from the date of receipt of complaint and will submit the report within 10 days of completion of the Enquiry. The exact nature of any disciplinary action taken against any person will remain confidential.

The Internal Complaints Committee (ICC) shall be governed by such rules as may be framed by Supreme Court Orders from time to time and by any other legislation that may be enacted on this subject from time to time.

Given the sensitive nature of cases of sexual harassment and their impact on the victim as well as the person against whom such allegations are leveled, K Raheja Corp Real Estate Private Limited is committed to maintaining confidentiality in relation to such complaints and the resultant Enquiry.

**E. Penalty Clause**

If the complaint is found to be true, the Employer will initiate any/all actions:

- a) Warning letter

- b) Transfer of services
- c) Suspension/Termination of employment

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**Management and Review**

This Policy shall be reviewed periodically for its suitability and updated when necessary.

**Amendment**

This Policy shall stand amended to the extent of any change in Applicable Law, including any amendment to the Residential Real Estate regulations, without any action from the Entity. The Board of Directors of the Entity reserves the right to amend or modify this Policy in whole or in part, at any time without assigning any reason whatsoever.