

22.0 Environment, Social & Governance
P22.9 Protection against Sexual Harassment (POSH) Policy
Vardhman Group

Document Attributes

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22.9.1. Objective

The purpose of this policy is to ensure that the work environment is professional, open, trusting, and devoid of gender-based discrimination and harassment. Sexual harassment of any form at the workplace is strictly prohibited at the Company, regardless of the gender of the person involved.

The company values each and every employee working with them and is committed to protecting their dignity and self-respect. The Company has a zero-tolerance approach towards sexual harassment and shall initiate all appropriate steps to prevent any kind of sexual harassment at the workplace.

This policy is in line with the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013.

22.9.2. Scope & Applicability

The Policy on “Protection against Sexual Harassment” covers every employee at Vardhman.

This policy applies to all categories of employees of the Company, including management employees, workmen, apprentices, and contract employees, whether at our workplace or on company premises. Additionally, this policy also extends to individuals who are associates of the company such as customers, visitors, etc. but are subject to sexual harassment on company premises.

22.9.3. Definition

1. Sexual Harassment would mean any or one or more of the following unwelcome acts or behavior (whether directly or by implication) but not limited to:
 - a. Any unwelcome sexually determined behavior, or pattern of conduct, that would cause discomfort and/or humiliate a person at whom the behavior or conduct was directed namely:
 - i. Physical Contact and advances
 - ii. Demand or request for sexual favours
 - iii. Sexually coloured remarks, including but not limited to vulgar /indecent jokes, letters, phone calls, text messages, e-mails, gestures, etc.
 - iv. Showing pornography or the likes
 - v. Any other unwelcome physical, verbal, or non-verbal conduct of a sexual nature.
 - vi. Physical contact and advances such as touching, stalking, and sounds which have explicit or implicit sexual nature/ connotation/ overtones in the work area and work-related areas.
 - vii. Verbal or Non-Verbal communication which offends the individual's sensibilities and affect her/ his performance and has sexual connotation/ overtone/ nature
 - viii. Teasing, Voyeurism, innuendos and taunts, physical confinement and/or touching against one's will and likely to introduce upon one's privacy

- b. The following circumstances, among other circumstances, if it occurs or is present in relation to any sexually determined act or behavior amount to sexual harassment:
- Implied or explicit promise of preferential in the employment
 - Implied or explicit threat or detrimental treatment in the employment
 - Implied or explicit threat about the present or future employment status
 - Interference with the work or creating an intimidating, offensive, or hostile work environment
 - Humiliating treatment likely to affect health or safety

An alleged act of Sexual Harassment committed during or outside of office hours falls under the purview of this policy.

2. Workplace includes all Company premises and shall include any place visited by the employee in the course of employment including transportation provided by the employer for undertaking such journey.
3. Respondent means a person against whom the aggrieved person has made a complaint.
4. Aggrieved Person means a person in relation to workplace whether employed or not, who alleges to have been subject to any act of sexual harassment by the Respondent.

22.9.4. Ambit of Workplace under POSH

The definition of the workplace under the POSH Act is comprehensive and includes any place inhabited or visited by the employee arising out of or during the course of employment.

Hence any act of sexual harassment affected virtually in a home or remote working space can be included in the notional definition of a 'workplace' which encompasses the following –

- The physical premises of the office
- Transportation provided by the employer to undertake an official journey
- Any place visited by the employee arising out of or during the course of employment
- Co-working spaces – physical or virtual
- Telecommuting, digital platforms, virtual communication platforms, video conferences, remote workspaces, etc. used for work-related communication in any form.

Sexual harassment is not just an occurrence during working hours or in the workplace itself. The behaviour can be sexual harassment in an extended work-related context including but not limited to conferences, work functions, business or field trips, and interactions with clients.

22.9.5. Prohibited Conduct

Sexual Harassment is defined under the Sexual Harassment of Women at Workplace (Prevention, Prohibition, and Redressal) Act, 2013. Non-sexual Harassment includes but not limited to offensive language, derogatory comments, bullying, intimidation, or discrimination based on gender, sex, race, ethnicity, nationality, or any other characteristic.

22.9.6. Responsibilities Regarding Sexual Harassment

All employees of the Company have a personal responsibility to ensure that their behavior is not contrary to this policy. All employees are encouraged to reinforce the maintenance of a work environment free from sexual harassment.

22.9.7. Complaint Mechanism

An appropriate complaint mechanism in the form of the “Internal Complaints Committee” has been created in the Company for time-bound redressal of the complaint made by the victim.

22.9.8. Corrective Action

It may include any of the following:

- i. **Written Apology:** Obtain a formal written apology from the respondent.
- ii. **Disciplinary Action:** Issuing a warning or reprimand to the respondent.
- iii. **Career Impact:** Withholding promotions or increments.
- iv. **Change of work/Location:** Change of work assignment/transfer for either the respondent or aggrieved person.
- v. **Suspension or Termination:** Temporary Suspension from services of the employee until found guilty of the offense
- vi. **Termination:** Terminate the respondent’s employment, if warranted by the severity of the case.
- vii. **Penalty:** Deduction from salary for compensation to the aggrieved employee, as deemed appropriate
- viii. **Counseling:** Access to counseling or employee assistance programs for victims of harassment through On-Site Support i.e. Availability of trained Labour Welfare Officers and Industrial Psychologists at each unit to assist.

In case the complaint is found to be false or malicious intent, the Complainant shall, if deemed fit, be liable for appropriate disciplinary action by the management.

22.9.9. Appeal

Any person aggrieved from the recommendations of the ICC under the provisions above, or non-implementation of such recommendations may prefer an appeal to appellate authority as prescribed under law.

22.9.10. Alignment with Global Standards

- **Global Compliance:** This policy is aligned with ILO conventions, including C190 and R206, and incorporates best practices to ensure a harassment-free workplace.
- **Inclusivity:** Acknowledges all forms of harassment and discrimination, fostering an inclusive and respectful work environment.

- **Conciliation Process:** At the request of the aggrieved employee, the ICC may attempt conciliation, ensuring that monetary settlement is not the basis. Upon settlement, the ICC shall forward the agreement to the Corporate HR Head for implementation, and no further inquiry will be conducted.

22.9.11. Training & Awareness

- Periodic training sessions, including in-person workshops and online modules, to help employees recognize and prevent harassment and discrimination.
- Orientation and sensitization programs designed to raise awareness of workplace behavior expectations along with sessions for all employees focused on preventing workplace harassment.
- Inclusion of policy guidelines in employee onboarding materials and periodic communication reminders.
- Periodic feedback and evaluation of training sessions to ensure effectiveness.
- An anonymous feedback system is open for employees to share their views on the policy's effectiveness and workplace culture on the dedicated email ID.

22.9.12. Confidentiality

The Company understands that it is difficult for the victim to come forward with a complaint of sexual harassment and recognizes the victim's interest in keeping the matter confidential.

To protect the interests of the victim, the accused person, and others who may report incidents of sexual harassment, confidentiality will be maintained throughout the investigatory process to the extent practicable and appropriate under the circumstances.

22.9.13. Governance

- The Environment, Social & Governance (ESG) Committee of the Board shall govern the POSH Policy.
- This committee shall oversee the implementation and adherence to this policy.
- This committee is responsible for periodic assessments and reporting compliance to the management.

22.9.14. Policy Review

This policy will be reviewed As & When needed, to ensure that it remains effective, promotes a safe working environment, and stays aligned with legal and social changes.