

## **PREVENTION OF SEXUAL HARASSMENT POLICY AT WORKPLACE**

### **Preamble:**

Sunteck Realty Limited (hereinafter referred to as “Sunteck”, “Company” or “We”) one of the fastest growing Maharashtra-based luxury real estate company, engaged in the business of construction, development, leasing, and management of commercial and residential properties. The Company strives to provide a safe and harassment-free workplace for all employees and promote equality through prevention, elimination, and redress discrimination in the form of sexual harassment in the workplace. We do not tolerate any form of sexual harassment or misconduct in the workplace. This policy has been developed to prevent sexual harassment and provide a framework for dealing with any incidents that may occur. Any person who is involved in causing sexual harassment shall be subject to appropriate disciplinary action.

Pursuant to Sexual Harassment of Women at Workplace (Prevention, Prohibition, and Redressal) Act, 2013, and Sexual Harassment of Women at Workplace (Prevention, Prohibition, and Redressal) Rules, 2013 (“PoSH Act”), a policy has been framed for prevention of sexual harassment at workplace. The objective of the policy is to provide the employees of the Company a workplace free from harassment/discrimination and every employee is treated with dignity and respect.

### **Scope of the Policy**

This Policy applies to all employees, including permanent and temporary employees, contract workers, consultants, interns, and any other individuals who are associated with Sunteck in any capacity. This Policy also applies to all work-related situations, including work-related events, trips, and meetings, and any other activities that are part of our employees' job duties.

Sexual harassment is strictly prohibited in our workplace, and we have a zero-tolerance policy towards sexual harassment or misconduct (non-sexual harassment) by our employees or any third-party that interacts with our business.

### **Definition of Sexual Harassment under PoSH Act**

“Sexual harassment” includes any one or more of the following unwelcome acts or behavior (whether directly or by implication) namely:-

- i. Physical contact and advances; or
- ii. A demand or request for sexual favors; or
- iii. Making sexually colored remarks; or
- iv. Showing pornography; or
- v. Any other unwelcome physical, verbal or non-verbal conduct of sexual nature;

### **Meaning of the workplace from Company's perspective:**

The workplace includes:

1. All offices or other premises where the Company's business is conducted.
2. All company-related activities performed at any other site away from the Company's premises.
3. Construction & development Sites
4. Any social, business or other functions where the conduct or comments may have an adverse impact on the workplace or workplace relations.
5. Any informal/unofficial arrangements made by the employees at any other site which is not covered in above statements

### **Constitution of Internal Complaints Committee (ICC):**

As provided under the PoSH Act, the Company has constituted an Internal Complaints Committee ("ICC") for redressal of sexual harassment complaint (made by the victim) and for ensuring time bound treatment of such complaints. The internal complaints Committee is responsible for;

- Investigating every formal written complaint of sexual harassment.
- Taking appropriate remedial measures to respond to any substantiated allegations of sexual harassment.
- Discouraging and preventing employment-related sexual harassment.

### **Procedure:**

The complaint shall have to be in writing and can be in form of a letter, within 7 days from the date of occurrence of the alleged incident, sent in a sealed envelope. Alternately, the employee can send complaint through an email. The employee is required to disclose their name, department, division and location they are working in, to enable the Presiding Officer to contact them and take the matter forward permits in writing to the Committee.

Soon after registering the complaint, the Chairperson shall notify the complainant and the accused ("Parties") to the enquiry, calling upon them to appear before the Committee on the date and time specified therein.

The complainant and the accused shall be heard individually by the Committee and subsequently, if the need be, the Committee may hear the parties jointly.

- If the complainant is a third party and the aggrieved is not willing for a personal appearance before the Committee due to any personal reason, the Committee shall proceed with enquiry on the basis of prima facie evidence.
- The Committee after hearing the complainant shall issue report to the accused calling on him/ her to defend the charges within a date not later than seven working days.

- The Committee shall record the entire process of hearing duly signed by the Parties to the enquiry as token of their acceptance to the record.
- If the Committee so desires, the Committee shall summon, by sending notice to any employee of company and/or any third party to appear before the Committee as witness to the incident which is the subject matter of the Complaint.
- The Committee after careful hearing the Parties and on complete cognizance of the issues, shall recommend the disciplinary action/s which the Committee deems fit and proper in the context of the issues of the Complaint
- The Committee is expected to complete the entire course of hearing within thirty days of complaint or as per the timeline given in the POSH Act.

### **Confidentiality and Non-Retaliation:**

Sunteck strives to protect the privacy and confidentiality of the complainant and the accused throughout the investigation process. Additionally, no employee will face retaliation for reporting an incident of sexual harassment or for participating in an investigation.

### **Disciplinary Action:**

The Disciplinary action shall commensurate with nature of harassment or violation of human right. If any employee of the Company is found guilty the following punishment shall be awarded.

- Necessary warning by the Company to such guilty employee
- Written apology to be sought from such guilty employee
- Demotion in designation of such guilty employee
- Cut off of the remuneration of such guilty employee as a penalty
- Withholding of Promotion of such guilty employee
- Withdrawal of assignments
- Calling upon such guilty employee to produce bond of Good Behaviour.
- Termination of the employment of such guilty employee

### **Prevention:**

Sunteck strives to prevent sexual harassment in the workplace. We will provide regular training to our employees to ensure they understand what constitutes sexual harassment and how to prevent it. Sunteck also strives to maintain a work environment that is free from sexual harassment and promote a culture of respect and professionalism.

### **Awareness & Training:**

Sunteck provides periodic training from time to time on the Policy for all its employees.