



GRP LIMITED

Title: PREVENTION OF SEXUAL HARASSMENT AT WORKPLACE (POSH) POLICY

Doc. No.

HO/HR/03

Rev. No.

3

Rev. Date

1 May 2024

Page No.

Page 1 of 8

1. PURPOSE

GRP Ltd. and its Subsidiary Group Companies (hereinafter referred to as 'The Company') are committed to providing a work environment that ensures every employee is treated with dignity, respect, and equality.

Every employee of GRP has the Right to be free from Sexual Harassment and the Right to Work in an environment free from any form of Sexual Harassment in accordance with the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (commonly known as POSH).

The Company will not tolerate any form of sexual harassment and take all necessary steps to ensure that its employees are not subjected to any form of it. The Company will actively promote a social, physical & psychological environment that will raise awareness about and deter acts of sexual harassment against its employees.

While the policy is written in accordance with the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, it shall apply in its intent and principles to all employees of GRP belonging to other genders.

2. OBJECTIVES

To uphold the commitment of Company group to provide an environment free of discrimination and indecent behavior against anyone at workplace.

To actively promote a social, physical and psychological environment that will raise awareness about and deter/discourage acts of sexual harassment against anyone.

To ensure the implementation of the policy in letter and spirit by undertaking all necessary and reasonable steps including the constitution of appropriate Committees for purposes of gender sensitization and to conduct enquiries into complaints of sexual harassment.

To evolve a mechanism and forum for the prevention and redressal of sexual harassment against anyone.

3. SCOPE

This Policy applies to all categories of employees of the Company, including any person employee on a regular, temporary, ad hoc, or daily wage 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 expressed or implied and includes a co-worker, a contract worker, probationer, trainee, apprentice or called by any other such name, at the workplace or client sites. The Company will not tolerate sexual harassment, if engaged in by clients, contractors or any other business associates.

The workplace includes:

- All offices or other premises where the Company's business is conducted.
- All company-related activities performed at any other site away from the Company's premises, including 'work from home' scenarios.
- Any social, business or other functions where the conduct or comments may have an adverse impact on the workplace or workplace relations.
- Any place visited by the employee arising out of or during the course of employment including transportation provided by the employer for undertaking such a journey.

	GRP LIMITED	Doc. No.	HO/HR/03
		Rev. No.	3
	Title: PREVENTION OF SEXUAL HARASSMENT AT WORKPLACE (POSH) POLICY	Rev. Date	1 May 2024
		Page No.	Page 2 of 8

4. DEFINITIONS

- a. **Act:** means the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013
- b. **Aggrieved Employee:** Employee who has experienced or has been subjected to any act of Sexual Harassment by another Employee or a third party
- c. **Complaint:** means a complaint of Sexual Harassment lodged with the Internal Committee
- d. **Complainant:** means an Aggrieved Employee who lodges a Complaint with the IC
- e. **Employee(s):** means a person employed at workplace for any work on regular, temporary, ad hoc or daily wage 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, a contract worker, probationer, trainee, apprentice or called by any other such name;
- f. **Internal Committee (IC):** means the IC constituted by Company Group in accordance with the provisions of the Act for redressal of a Complaint which is the same as ICC (Internal Complaints Committee) as amended by the act.
- g. **Respondent:** means a person against whom a Complaint is made by an Aggrieved Employee
- h. **Sexual Harassment:** Sexual Harassment would mean any one or more of the following unwelcome behavior (whether directly or by implication) namely:
 - i. Physical Contact & 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;
 - vi. Singling out someone of particular gender for rebuttal or stricter imposition of penalties, passing derogatory comments to someone of a particular gender in presence of representatives of other genders or passing derogatory comments about a particular gender in public and other forms of creating a hostile work environment.

5. ROLES AND RESPONSIBILITIES

1) **Responsibilities of Individual:** It is the responsibility of everyone to respect the rights of others and to never encourage harassment. It can be done by:

- a. Immediately inform the alleged harasser that the behavior is unwelcome
- b. Reinforce your statements with a firm tone and professional body language
- c. Do not pretend that it did not happen.
- d. Do not feel compelled to accept behavior that makes you uncomfortable, even if others are willing to tolerate it
- e. Be supportive of people who wish to talk about their being sexually harassed & direct them to the appropriate authorities
- f. Immediately inform one of the members of the Internal Committee All are encouraged to educate others of behavior that is unwelcome. Often, some behaviours are not intentional, however if it is not acceptable by the individual experiencing it, it does give the person the opportunity to modify or stop their offensive behaviour.

	GRP LIMITED	Doc. No.	HO/HR/03
		Rev. No.	3
	Title: PREVENTION OF SEXUAL HARASSMENT AT WORKPLACE (POSH) POLICY	Rev. Date	1 May 2024
		Page No.	Page 3 of 8

2) **Responsibilities of Managers:** All managers at GRP Ltd. must ensure that nobody is subject to harassment and there is equal treatment. They must also ensure that all employees understand that harassment will not be tolerated; that complaints will be taken seriously; and that the complainant, respondent/s, or witnesses are not victimized in any way.

3) **Responsibilities of Employers (Management):** It is the duty of the Management to comply with the Act and take necessary steps, such as...

- a) Provide a safe working environment at the workplace
- b) Form "Internal Committee" (IC) for prevention, prohibition and redressal of sexual harassment at workplace.
- c) Display at any conspicuous place in the workplace, the list and contact information of IC members.
- d) Organize workshops and awareness programmes at regular intervals for the employees.
- e) Carry out orientation programmes and seminars for the Members of the IC
- f) Conduct capacity building and skill building programmes for the Members of the IC
- g) Assist in securing the attendance of respondent and witnesses before the IC.
- h) Provide assistance to the complainant if they choose to file a complaint in relation to the offence under the Indian Penal Code.
- i) Monitor the timely submission of reports by the IC.

4) **The IC is responsible for:**

- a) Preventing and prohibiting sexual harassment at workplace by spreading awareness about the act, procedure and its legal consequences.
- b) Receiving complaints of sexual harassment at the workplace
- c) Initiating and conducting inquiry as per the established procedure
- d) Submitting findings and recommendations of inquiries
- e) Being fair with both the parties, complainant and respondent.
- f) Coordinating with the Management in implementing appropriate action
- g) Maintaining strict confidentiality throughout the process as per established guidelines.
- h) Submitting annual reports in the prescribed format

PREVENTION OF SEXUAL HARASSMENT

The following circumstances, among other circumstances, if it occurs or is present in relation to or connected with any act or behavior of sexual harassment may amount to sexual harassment:

- a) Implied or explicit promise of preferential treatment in their employment; or
- b) Implied or explicit threat of detrimental treatment in their employment; or
- c) Implied or explicit threat about their present or future employment status; or
- d) Interference with their work or creating an intimidating or offensive or hostile work environment for their;
- e) Humiliating treatment likely to affect their health or safety.

	GRP LIMITED	Doc. No.	HO/HR/03
		Rev. No.	3
	Title: PREVENTION OF SEXUAL HARASSMENT AT WORKPLACE (POSH) POLICY	Rev. Date	1 May 2024
		Page No.	Page 4 of 8

CONSTITUTION OF THE INTERNAL COMMITTEE

The Internal Committee (IC) will be constituted by the Company as follows:

Role	Description
Appellate Authority	Lady – Management Nominee
Apex Committee	Presiding Officer – Lady, from the Senior/ Top Management Group 3 Members from existing employee groups, at least 1 male member is required External Member – Lady, as specified by the Act
Location Representatives	Head of the Unit or a representative nominated by the Management. There would be at least 1 Lady member in this Group.

The IC will be responsible be empowered to deal with Complaints from the aggrieved employees.

7. COMPLAINT REDRESSAL MECHANISM

- a) An Aggrieved Employee may make in writing, a Complaint of Sexual Harassment to the Internal Committee, within a period of three (3) months from the date of the incident and incase of series of incident, within a period of three (3) months from the date of last incident.
- b) Where the IC is satisfied that the circumstances were such which prevented the Aggrieved Employee from filing a complaint within the said period of three months, the IC may extend the time limit beyond 3 months, by recording the reasons in writing.
 - i. Where the Aggrieved Employee is unable to make a Complaint on account of their physical incapacity, a Complaint may be filed by:
 - ii. Their relative or friend; or
 - iii. Their co-worker; or
 - iv. An officer of the National Commission for Women or State Commission for Women; or
 - v. Any person who has knowledge of the incident, with the written consent of the Aggrieved Employee.
- c) Where the Aggrieved Employee is unable to make a Complaint on account of their mental incapacity, a Complaint may be filed by –
 - a. 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 she is receiving treatment or care; or
 - e. Any person who has knowledge jointly with their relative or friend or a special educator or qualified psychiatrist or psychologist, or guardian or authority under whose care they are receiving treatment or care;
- d) Where the Aggrieved Employee for any other reason is unable to make a Complaint, a Complaint may be filed by a person who has knowledge of the incident, with their written consent;
- e) Where the Aggrieved Employee is dead, a Complaint may be filed by any person who has knowledge of the incident, with the written consent of their legal heir(s).
- f) A Complaint may also be made orally. If the Complaint is oral, member of the IC to whom the Complaint is made shall record the same in writing, in detail, and have the contents confirmed by the Complainant.



GRP LIMITED

Title: PREVENTION OF SEXUAL HARASSMENT AT WORKPLACE (POSH) POLICY

Doc. No.

HO/HR/03

Rev. No.

3

Rev. Date

1 May 2024

Page No.

Page 5 of 8

8. PROCEDURE FOR RESOLUTION, SETTLEMENT OR PROSECUTION:

Conciliation: The IC may, before initiating an inquiry, at the request of the Aggrieved Employee take steps to settle the matter between their and the Respondent. The conciliation shall not be on monetary settlement basis. The settlement terms shall be recorded in writing and forwarded to Employer for action if required. Copies of the same shall be provided to the Aggrieved Employee and the Respondent. Where a settlement has been arrived at, no further inquiry shall be conducted by the Internal Committee.

If the above is not possible, the IC shall proceed to make inquiry into the Complaint in such manner as prescribed thereunder:

- a. The Complainant or the person lodging a Complaint on behalf of the Complainant shall file, with the Internal Committee, 6 written copies of the Complaint along with the supporting documents and names and addresses of witnesses.
- b. On receipt of Complaint the IC shall within a period of 7(Seven) days send one of the copies of the Complaint to the Respondent.
- c. The Respondent shall, within a period of 10 (Ten) days from the date of receipt of Complaint from the Internal Committee, file their reply to the Complaint along with their list of documents, names and addresses of witnesses.
- d. The IC shall investigate the complaint and provide its report as promptly as possible, no later than 90 working days from the date of the Complaint.
- e. The IC shall follow principles of natural justice in all its proceedings and subject thereto, shall maintain confidentiality of the identity of the Complainant, and the witnesses, as also the contents of the Complaint. Where the Respondent is subject to any applicable service rules of Company Group, the proceedings of the IC shall be conducted, as far as practically possible, in accordance with such service rules, and to the extent provided therein and in accordance with applicable law.
- f. A copy of the Complaint as recorded by the IC shall be given to the Respondent as well as the Complainant. The Respondent shall be required to submit their/their response to the Complaint as well as to indicate whether the Respondent wishes the IC to examine any witnesses or furnish any evidence. The Complainant shall also be required to indicate in writing whether the Complainant wishes the IC to examine any witnesses or furnish any additional evidence.
- g. Upon receipt of the responses from the Respondent and the Complainant, the IC shall conduct a hearing at such venue or venues as are convenient to the Complainant, where both the Complainant and the Respondent shall be heard in person. The IC shall notify both the Respondent and Complainant (as well as the witnesses, if any) of the time and venue of each hearing. Any records of the proceedings of such or any other hearings or meetings of the IC shall be maintained strictly confidential.

For the purpose of making an inquiry into the complaint the IC shall have powers of the civil court as under:

- a. Summoning and enforcing attendance of any person and examining him/their on oath.
- b. Requiring the discovery and production of documents; and
- c. Any other matter which may be prescribed



GRP LIMITED

Title: PREVENTION OF SEXUAL HARASSMENT AT WORKPLACE (POSH) POLICY

Doc. No.

HO/HR/03

Rev. No.

3

Rev. Date

1 May 2024

Page No.

Page 6 of 8

- d. Upon completion of the hearing, the IC shall prepare its written report which shall include a summary of the proceedings; the evidence adduced by the parties and the witnesses, and shall submit the same to employer. The said report shall further set out the Internal Committee's conclusions on whether an offence of Sexual Harassment, or any other violation of their Policy, has been committed or occurred, or whether the Complaint made by the Complainant is either false or unproven, as also the reasons/ rationale for the Internal Committee's arriving at such conclusion. The said report shall further set out the Internal Committee's recommendations on the disciplinary action(s) to be taken against the Respondent or Complainant (as the case may be). All members of the IC shall sign the said report.
- e. Where the IC arrives at a conclusion that the allegations against the Respondent have been proved, it shall recommend the following:
- f. To take action for sexual harassment as an act of misconduct in accordance with the rules/regulations of Company Group governing 'conduct and discipline' as applicable to the Respondent; and/or
- g. To deduct such amounts from the salary or wages of the Respondent as may be considered appropriate to be paid to the Complainant as per their Policy.
- h. In addition to the above, the recommendations may also include one or more of: Written apology; Warning; Reprimand or Censure; Withholding of promotion; Withholding of pay rise or increments; Termination of service of the Respondent.
- i. On the basis of the recommendations of the IC, if either the aggrieved employee or the alleged respondent is an employee of Company Group it shall transfer either party to any other workplace as it deems fit and proper. The place of transfer shall be as per company's requirements and neither the aggrieved employee nor the alleged respondent shall have any choice in the matter.
- j. During the pendency of the inquiry, if the IC is independently of the view that the presence of the alleged respondent at the workplace may be detrimental to the interest or conduct of a free and fair inquiry, it can recommend to Employer to place the alleged respondent under suspension pending completion of the inquiry, provided that the person sought to be suspended is a direct employee of the company.
- k. It is the duty of all parties concerned, i.e. the aggrieved employee, alleged respondent, and/or the witnesses, to maintain utmost secrecy and confidentiality with regard to the identity of the aggrieved employee, details of the complaint, inquiry proceedings, findings, recommendations, and action taken by Company. All parties involved in any Sexual Harassment matter must keep all aspects of the matter confidential.
- l. Any person aggrieved from the recommendations made by the committee or non-implementation of such recommendations may prefer an appeal to the appellate authority as per the provisions of the Act or to the Chief Compliance Officer or the Chief of Human Resources of the Company.

9. MALICIOUS OR FALSE COMPLAINTS

If an Employee is found to have raised a malicious or false Complaint against another person in order to prejudice that person, the Complainant may also be subject to appropriate disciplinary action as per service rules of Company Group. For recommending any punishment it is mandatory that the malicious intent on the part of the aggrieved women shall be established in an inquiry held for their purpose.

	GRP LIMITED	Doc. No.	HO/HR/03
		Rev. No.	3
	Title: PREVENTION OF SEXUAL HARASSMENT AT WORKPLACE (POSH) POLICY	Rev. Date	1 May 2024
		Page No.	Page 7 of 8

10. ROLE OF EMPLOYER

The Company shall undertake the following preventive measures to ensure that Sexual Harassment does not occur:

- Provide a safe working environment at the workplace which shall include safety from the persons coming into contact at the workplace
- Display at any conspicuous place in the workplace, the penal consequences of sexual harassment, and the order constituting the IC
- Organize workshops and awareness programs at regular intervals for sensitizing the employees with the provisions of the Act and conduct orientation programs for the members of the IC in the manner as may be prescribed
- Provide necessary facilities to the Internal Committee for dealing with the complaint and conducting an inquiry
- Treat sexual harassment as a misconduct under the service rules and initiate action for such misconduct
- Internal Committee needs to submit an annual report on sexual harassment to the Head – HR. who will submit the same to the concerned authorities in the manner as specified by the Act.
- Management reserves the right to revise, amend or modify their policy at any time and in any manner without notice. Any change or revision will be available with Corporate HR team and communicated appropriately.

11. REMOTE WORKING/ WORK FROM HOME PROTOCOL

Given the current requirement of business/ work processes, employees may need work from remote locations or from their home locations. All rules, policies and procedures (including applicability of this Policy) while working from a GRP location will automatically be applicable to working from remote/ home locations. Employees need to be mindful of the following while working remotely/ from home:

- All employees must display professional behavior during all interactions with employees and business associates while working remotely/ from home.
- Particularly for video calls, the professional attire must be maintained. No home clothes/ flashy or exposing attire will be allowed during video calls.
- Video calls need to be within the office working hours. While all efforts need to be maintained to have the videos switched on for a scheduled video call, regrets for the same need to be accepted as well.
- Conversations with colleagues or business associates shall be deemed to be official, even if the content of the conversation was of informal/ personal nature.
- Recording audio/ video calls without explicit permission/ consent of the participants is not allowed.

Annexure for the Internal Committee can be referred to as below.

	GRP LIMITED	Doc. No.	HO/HR/03
		Rev. No.	3
	Title: PREVENTION OF SEXUAL HARASSMENT AT WORKPLACE (POSH) POLICY	Rev. Date	1 May 2024
		Page No.	Page 8 of 8

ANNEXURE 'A'

INDEX OF MEMBERS OF THE INTERNAL COMMITTEE

Updated as on 1 May, 2024*

Sr No	Name	Role	Location	Contact Number	Email Id
1	Hemal Gandhi	Appellate	HO	022-67082500	hemal.gandhi@grpweb.com
2	Mandakini Chhag	Presiding Officer	HO	9870050769	mandakini.chhag@grpweb.com
3	S Balaji	Member	SL02	9629900357	production.sl02@grpweb.com
4	Preeti Kulkarni	Member	SL02	8793413163	admin.sl02@grpweb.com
5	Vishal Bhadange	Member	SL01	9049982060	vishal.bhadange@grpweb.com
6	Shweta Narayankar	Member	SL01	8550939371	hrsupport@gcsl.co.in
7	Nilesh Patil	Member	AK01	9033045820	nilesh.patil@grpweb.com
8	Snehalben Parmar	Member	AK01	8154985394	hr.ankleshwar@grpweb.com
9	Bhikhu Rakholia	Member	PL02	8000165971	bhikhu.rakholia@grpweb.com
10	Beena Babu	Member	PL02	9427879423	ithelpdesk.pnl@grpweb.com
11	Bhavana Bimanathini	Member	HO	8754442494	bhavana.bimanathini@grpweb.com
12	Pranali Manjrekar	Member	HO	7506259396	pranali.manjrekar@grpweb.com
13	Suhas Shekhadar	Member	SL03	8805114199	accounts.sl03@grpweb.com
15	Piyush Godha	Member	GSPL	9926007940	piyush.godha@gripsurya.com
14	Dr. Bijal Sheth	External Member		9930948828	bijal@aspirehumansolutions.com

Any Employee who wishes to get in touch with IC, Kindly send in your written complaint to The Presiding Officer for further action. IC will get in touch with you at the earliest.

*The change is effective from 1st May, 2024.