

# **Policy and Procedures Prevention of Sexual Harassment POSH**

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*Gaurs Group.  
Gaur Biz Park, Plot No-1,  
Abhay Khand – II, Indirapuram  
Ghaziabad*

## Prevention of Sexual Harassment Policy

### 1. Objective:-

- Gaur's Group recognizes that all employees have the right to work in an environment that is free from any form of harassment, including harassment with respect to race, ancestry, colour, sex, and sexual orientation, place of origin, ethnic origin, citizenship, creed, age, marital or family status and disability.
- As a part of the overarching statement above, Gaur's Group commits to provide a workplace, free from sexual harassment and provide a mechanism for redressal of any complaints in respect of sexual harassment without fear or threat of reprisals in any form or manner.

### 2. Applicability:-

- This policy is applicable to all regular-full time employees of Gaur's Group., all outside contractors and clients.

### 3. Procedure:-

#### Definitions:-

- Sexual harassment is deemed to be misconduct and includes such unwelcome sexually determined behavior (whether directly or by implication) as:
  - Physical contact and advances; or
  - A demand or request for sexual favors; or
  - Sexually colored remarks; or
  - Any unwelcome physical, verbal or non – verbal conduct of sexual nature; or
  - Unwelcome remarks or jokes; or
  - The display of pornographic, racist, or other offensive or derogatory pictures; or
  - Leering or other similar gestures; or
  - Persistent unwelcome social invitations; or
  - Unnecessary or unwelcome physical contact, and; or
  - Physical assault.

### **Guidelines:-**

- Gaurs Group. does not tolerate or condone sexual harassment or other unlawful behavior in the workplace, and or in connection with employment in the Company whether committed by a co-worker, leader, manager, client, contractor (including those working for an agency), supplier, or anyone else.
- Actions, behavior, words, jokes or comments that are derogatory and based on any person's gender, race, ethnicity, sexual orientation, age, religion, or disability will not be tolerated by Gaurs Group.
- Furthermore, the policy establishes that any actions which create an impression that objections/ complaints about sexual harassment would result in or create disadvantages in connection with employment or work including recruitment or promotion: and or that adverse consequences might result if the victim does not consent to the conduct in question and or objects thereto, and or any actions which creates a hostile work environment would also be viewed as sexual harassment by Gaurs Group in respect of which appropriate action will be taken in terms of the Policy.
- In light of the gravity of any allegation of sexual harassment, any employee who deliberately provides /fabricates false information in connection with a complaint of sexual harassment or investigation in respect thereof will likewise be subject to disciplinary action which could extend up to and include termination of employment.
- Anonymous complaints will not be entertained. However, the company will ensure that confidentiality is maintained in respect of both the complainant and the accused to the maximum extent possible.
- The Complaints Committee is the inquiry committee formed and deemed to be the Inquiring Authority to inquire into all complaints of sexual harassment without fear or threat of reprisals in any form or manner.

### **Committee Members:**

The Team shall consist of **7 employees** nominated by Management of Gaurs Group:-

For the Same purpose Internal Complaint Committee has been formed and it constitutes following members:-

1. **Mrs Nishbha Bhaskar**
2. **Ms Roma Shukla**
3. **Mrs. Sanchita Mitra**
4. **Mrs. Preeti Pandey**
5. **Mrs Swati**
6. **Mr. Abhishek Tandon**
7. **Member from external committee (CS)**

### **In case of Any Case Reported**

- The Committee members shall, after considering the findings and recommendations of the inquiry report and after taking into considerations the gravity of the misconduct, previous records (if any) of the employee concerned and other extenuating/aggravating circumstances that may exist, impose such punishment as may be considered necessary and appropriate, including dismissal from the services of Gaurs Group. The Committee members shall consider the inquiry report and take action thereon within 10 days' time respect of sexual harassment without fear or threat of reprisals in any form or manner.

### **In case of No Case Reported**

- The Committee members shall meet once in every quarter, and prepare a NIL Report which will be documented.

### **Employee Initiative**

- Any employee who feels/ believes that he or she has been subjected to or witnessed sexual harassment in the Company, has an obligation and duty to report the same to the Complaints Committee in writing by sending mail to [hrcommunications@gaursonsindia.com](mailto:hrcommunications@gaursonsindia.com).
- It is important to emphasize that regardless of the avenue used to report complaints, employees will not be retaliated against in any way for making a good faith complaint of harassment. However, in the event that an employee deliberately makes or concocts a false complaint/ allegation of sexual harassment, such complaint will itself be deemed to be misconduct and will be dealt with seriously.
- It is reiterated that confidentiality will be maintained at all times by the Committee and or any other person to whom the Complaints are made. Any Leader / Manager to whom a complaint of sexual harassment is made, is liable to submit the same to the Complaints Committee for necessary action respect of sexual harassment without fear or threat of reprisals in any form or manner.

### **Process / Procedure in case of a complaint of Sexual Harassment :-**

- An employee who is aggrieved by any conduct / behavior or is witness to or privy to information that amounts to sexual harassment is required to submit a written complaint to the complaints Committee by sending mail to [hrcommunications@gaursonsindia.com](mailto:hrcommunications@gaursonsindia.com). The said complaint should contain all available information that the complainant has or is aware of. All complaints shall be treated with full confidentiality. Anonymous complaints will not be entertained by the Company.
- In any event, it is advisable that a complaint be made within three days from the cause of the complaint.
- The Complaints Committee shall investigate the complaints so received, and shall thereafter submit the report to Management within 10 days for further course of action.
- In the event that complaint is received against a member of the Complaints Committee, the said member shall not in any event participate in any proceedings connected to the said complaint.
- The Complaints committee could, at its discretion depending on the gravity of the allegations, either conduct a detailed inquiry or take other suitable action based on the evidence available.

**Note: Please Contact HR for any queries regarding this policy.**

#### **4. Disclaimer:-**

Company's Absolute Right to Alter or Abolish the Plan.

Gaurs Group reserves the right in its absolute discretion to abolish the Policy at any time or to alter the terms and conditions. Such discretion may be exercised any time, before; during or after the Policy year is completed.