

PREVENTION OF SEXUAL HARASSMENT POLICY

Policy Ownership & Management		
Issuer	Owner	Approver
HRD & ES	Head HRD & ES	Director Finance – Group CFO

Version	Issued Date	Effective From Date	Brief description of Change / Review
1.	01-04-2013	01-04-2013	First Release
5.	04-07-2024	04-07-2024	Reformatted and Change in IC Committee Members
6.	23-06-2025	23-06-2025	Change in IC Committee Members

1. Purpose

Oberoi Realty Limited (ORL) is committed to foster a safe, respectful, and inclusive work environment for all employees. This policy aims to prevent, address, and eliminate instances of sexual harassment in the workplace by outlining clear guidelines, reporting mechanisms, and corrective actions. ORL is committed to ensuring that every employee can work in an atmosphere of mutual respect, free from harassment, and where their dignity is upheld.

2. Scope

This Policy shall apply to all Employees of ORL whether permanent or temporary, probationary, or part-time or working as a consultant or on a voluntary basis or engaged through a contractor or agent, including Employees at site offices/centres. Where Sexual Harassment occurs against any Employee/s as a result of an act by a third party or outsider while on official duty, ORL will take all necessary and reasonable steps as per the applicable rules and regulations, to initiate action at the workplace of the third party or outsider. This Policy shall be applicable to any allegation of Sexual Harassment at ORL premises including any place visited by an Employee/s arising out of or during the course of employment and/or transportation provided by ORL. While the benefit of protection and seeking relief under this Policy is available to employees, it is clarified that the accused/ victim could be of any gender.

3. General Guidelines

- I. This Policy is formulated pursuant to enforcement of Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and any amendment thereto (the 'POSH Act').
- II. Definitions
 - "Employee" means any person employed in ORL 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 ORL, 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 name.
 - "Oberoi Realty Limited" shall mean and include all companies, firms, trust, joint venture associated with Oberoi Realty Limited.
- III. For the purpose of this policy, Sexual Harassment means and includes such unwelcome sexually determined behaviour (whether directly or by implication) as:
 - Physical contact and advances.
 - A demand or request for sexual Favors.
 - Sexually coloured remarks.
 - Showing pornography.
 - Sexual demands, whether by words or actions.
 - Any other unwelcome physical, verbal, or non-verbal conduct of sexual nature.

Some of the instances that would constitute Sexual Harassment are given in "Annexure A" hereto. Please note that the same are only examples of some acts/ conduct that would constitute Sexual Harassment. Whether any other act would constitute Sexual Harassment would depend on the facts and circumstances of that case.

IV. Sexual Harassment Circumstances

Sexual Harassment can occur in a variety of circumstances, including but not limited to the following:

- The harasser can be of any gender, the victim's supervisor, an agent of the employer, a supervisor in another area, a co-worker or anyone else associated with ORL.
- The victim does not have to be the person harassed but could be any other Employee affected by the offensive conduct.
- Sexual Harassment may occur without economic injury to the victim.

Any complaint/ incident of Sexual Harassment brought to the notice of HR/ MD/ department or function managers/ immediate supervisor by the victim shall not be condoned. All such complaint/ incident of Sexual Harassment shall be immediately forwarded to the Presiding Officer of the internal complaint committee for action.

4. Grievance Redressal Mechanism

- I. Committee: A committee called the Internal Complaint Committee ("the said Committee") has been constituted to investigate complaints of Sexual Harassment, as required under the POSH Act. The current constitution of the said Committee is given in Annexure 'B'.

The head of HR department of ORL shall have the power to add, remove, replace or substitute all or any member/s of the said Committee.

- II. Reporting of the Incident: Any employee who has been subjected to and/or is a victim of Sexual Harassment and wishes to lodge a complaint should, within three months from the date of such incident and in case of series of incidents, within three months from the date of last incident may follow the following procedure:
- III. File a complaint of Sexual Harassment, in writing, in the format prescribed in 'Form A' annexed hereto to the said Committee, by email to orl.posh@oberoirealty.com
- IV. The Presiding Officer will arrange for preliminary inquiries to assess the complaint. The said Committee may, condone any delay on the part of the employee in filing the complaint and extend the time limit by a period not exceeding three months, if it is convinced that the circumstances were such that the employee was prevented from filing a complaint within the stipulated timeframe. All complaints will be inquired into, and appropriate corrective action will be initiated. The said Committee will keep the complaint and the identity of the persons involved and the details thereof confidential. The said Committee shall follow the principles of natural justice and parties will be given an opportunity of being heard by the said Committee and thereafter also be allowed to make their representations pursuant to the findings of the said Committee.
- V. In case the complaint is deemed to be false and/or the intent of the complainant/ victim is found to be malicious, necessary action may be initiated against the complainant/victim. It is to be noted that inability to produce evidence will not be deemed to be a false complaint.
- VI. Action taken if found guilty
- The genuineness of the complaint will be inquired into, established and the action recommended by the said Committee will be communicated to the head of HR department. The said Committee shall complete the inquiry within 90 days of the receipt of the complaint and submit a report to the head of HR department within 10 days after completion of inquiry and such report shall also be made available to the

concerned parties. All the actions recommended by the said Committee shall be implemented by the HR team of ORL within a period of 60 days from the date of receipt of report. If the recommendations of the said Committee are not accepted, then the reasons must be recorded in writing by the head of HR department for non- acceptance. If the said Committee needs an extension beyond 90 days, then the said Committee will have to give a written request to the head of HR department with the reason for delay.

VII. Pending an inquiry into a complaint, at the request of the Employee, the said Committee may transfer the Employee to any other department or workplace of ORL or on request, grant leave up to a period of three months (which leave shall be in addition to the leave he/she would otherwise be entitled) or grant such other reliefs as may be prescribed.

VIII. Appeal: This policy does not prevent any Employee from taking recourse to the law of the land.

5. Frequency of review of Policy

The policy shall be reviewed on an annual basis (or any frequency as it may deem fit) to maintain the efficacy of the engagement with our internal and external stakeholders.

Unmesh Mayekar

Head – HRD and ES,
Oberoi Realty Limited

Saumil Daru

Director Finance – Group CFO,
Oberoi Realty Limited

ANNEXURE A

INSTANCES OF ACTS/CONDUCT THAT WOULD CONSTITUTE SEXUAL HARASSMENT

- Implied or explicit promise of preferential treatment in employment.
- Implied or explicit threat of detrimental treatment in employment.
- Implied or explicit threat about present or future employment status.
- Interference with work or creating an intimidation or offensive or hostile work environment.
- Humiliating treatment likely to affect health or safety.
- Unwanted sexual advances or propositions to an employee.
- Eve-teasing
- Physical Conduct such as unwanted touching, physical contact assault, impeding or blocking movements of employee.
- Any demand or request for sexual favors.
- Offering employment benefits to the employee in exchange for sexual favors.
- Leering, making sexual gestures, displaying sexually suggestive objects or pictures, cartoons, calendars or posters to the employee or in the presence of the Employee.
- Communications of a sexual nature to the employee whether in physical copy or through electronic means such as email, telephone, including suggestive, lewd or obscene letters, notes or invitations.
- Retaliating or threatening retaliation against the employee after a negative response to sexual advances or for reporting or threatening to report sexual harassment by such employee.
- Unsavoury remarks, whistling, staring, sexually slanted and obscene jokes, jokes causing or likely to cause awkwardness or embarrassment at/to/against or in the presence of the employee.
- Subtle innuendoes or open taunting regarding perfection or imperfection about physical appearance of the employee's or his/her body parts or shape.
- Gender based insults and/or sexist remarks.
- Making verbal sexual remarks or making sexual gestures or advances or indulging in exhibitionism in the presence of the employee.
- Unwelcome sexual overtones to the employee in any manner such as over telephone (obnoxious telephone call) and like.
- Sexually explicit and derogatory statements or sexually coloured remarks in the presence of or about the employee.
- Making distasteful remarks of a sexual nature that disparages the character of the employee.
- Joking and sniggering by one or more Employees that carry sexual undertones with a view to humiliate or embarrass the employee.
- Sending and/or displaying pornographic messages or content to or in the presence of the employee, whether in physical, electronic or other form.
- Compromising invitation or forcible calling for a date of the employee.
- Any act or conduct by a person in authority which denies or would deny equal opportunity in pursuit of career development or otherwise making the environment at the workplace hostile or intimidating to the employee, only on the ground of sex.

FORM A

To,
The Presiding Officer
Internal Complaints Committee

Dear Sir/ Madam,

I/We, (Complainant's name) request this Committee to conduct an inquiry into the acts of Sexual Harassment by (Name of the alleged harasser) for the offences committed by him/ her, details of which are given below:

1. Summary of the Incident and summary of the allegation along with supporting documents, if any and witnesses, if any:

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2. Summary of allegation:

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3. Supporting documents, if any:

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4. Witnesses, if any:

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I/We request you to kindly look into the matter urgently and in accordance with the POSH Act. Sincerely,

Signature/Thumb Print

Name:

Date:

Place:

ANNEXURE B**ICC Members****Employee Members:**

Sr No.	Name	Contact Details
1	Rakhee Desai – Presiding Officer	9833886087
2	Pankaj Pandit – Committee Member	9819160948
3	Chintan Sanghavi – Committee Member	9833876228
4	Hitesh Naik – Committee Member	9820927643
5	Amita Nijhawan – Committee Member	9930105345
6	Poonam Pandey – Committee Member	7506062722

External Member:

Sr No.	Name	Contact Details
1	Smita Shetty Kapoor	9987199277