



## SEXUAL HARASSMENT REDRESSAL POLICY

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### **Annexure A - Index of the Members of Internal Committee**

## **1. OBJECTIVE**

Smartworld Developers Private limited (**Smartworld**) is committed to keeping the workplace free from Sexual Harassment and has framed a procedure, in line with **The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013** to be followed in cases where employee(s) alleges sexual harassment at workplace.

## **2. SCOPE**

All employees will be covered under the present Policy Against Sexual Harassment at Workplace (hereinafter referred to as 'the Policy'). The Policy against sexual harassment includes sexual harassment by fellow employees, supervisors, managers as well as agents, contractors, customers, vendors, partners and, visitors including outsource employees. This policy is with respect to prevention, prohibition and redressal of sexual harassment which may arise at:

- (i) Company Workplace(s).
- (ii) Extended workplace or locations where acts are conducted with respect to working relationships or while fulfilling professional duties or which may be visited by an employee during employment, including third party premises, lifts, parking, transportation, virtual workspaces, or even virtual communication platforms.
- (iii) It is to be noted that this Policy is a Gender-Neutral Policy and all employees, regardless of Gender, shall have the right to file a complaint in cases of sexual harassment, under this policy.

## **3. DEFINITIONS**

- (1) **"Aggrieved Person"** means any person alleging sexual harassment at workplace by the Respondent.
- (2) **"Company"** means Smartworld Developers Private limited, and include its subsidiaries, affiliates, and associated entities (hereinafter referred to as **"Smartworld"**). It is hereby confirmed that the Internal Committee (IC) constituted by the Company will be responsible for adjudicating any POSH-related cases that may arise at any of the Company's workplaces.
- (3) **"Complaint"** means a written complaint filed by an aggrieved person alleging sexual harassment at workplace.
- (4) **"Employee"** means any person on the rolls of the Company including temporary, part-time and honorary employees by whatever name is called. For the purposes of the Policy, employees shall be deemed to include people employed on a casual or project basis, contractual or otherwise, and include people engaged as Trainees and Consultants or on any other title denoting similar roles.
- (5) **"Internal Committee"** means a committee constituted, by the Company through a Board resolution dated July 5<sup>th</sup>, 2025
- (6) **"Respondent"** means a person against whom the aggrieved person has made a Complaint.
- (7) **"Sexual Harassment"** includes any one or more of the following unwelcome acts or behavior (whether directly or by implication) such as:
  - i. Physical contact and advances; or
  - ii. A demand or request for sexual favors.
  - iii. Making sexually colored remarks; or
  - iv. Showing pornography or other offensive or derogatory pictures, cartoons, representations, graphics, pamphlets or sayings; or

- v. giving gifts or leaving objects that are sexually suggestive.
- vi. persistent watching, Staring, following, contacting of a person; or any other unwelcome physical, verbal or non-verbal conduct of sexual nature.
- vii. Any other unwelcome physical, verbal or non-verbal conduct of sexual nature.

(8) **“Workplace”** means and includes all offices, project site(s), sales gallery, extended workplace or other premises where the Company’s business or operations are being conducted and/or undertaken. It also includes any off-sites, social, business or other functions/gatherings where the conduct or comments may have an adverse impact on the Company’s reputation and/or workplace relations.

**Following circumstances amongst other circumstances mentioned above may constitute sexual harassment if it occurs in relation with any act of sexual harassment:**

- a. Implied or expressed promise of preferential treatment in relation to employment.
- b. Implied or express threat of detrimental treatment in relation to employment
- c. Submission to such conduct is made an implicit or explicit term or condition of employment; and/or
- d. Submission to or rejection of such conduct is the basis of any employment decision; and/or
- e. Such conduct unreasonably interferes with an individual’s work performance or creates an intimidating, hostile or offensive environment.

The above is only an indicative list of possible acts which could be treated as sexual harassment and is in no way intended to be construed as an exhaustive list.

## **4. INTERNAL COMMITTEE (IC)**

To inquire and advice suitable action on the complaints on Sexual Harassment, the Company’s Board of Directors has formulated an Internal Committee constituted under this Policy in accordance with the POSH Act, 2013. The investigation shall be carried out by the Internal Committee constituted for this purpose.

As per the Act, the Internal Committee shall consist of the following members as nominated by the Company’s Board of Directors:

- i. A woman employee employed at a Senior Level shall act as the Presiding Officer of the Committee
- ii. Not less than 2 members from amongst employees preferably committed to the cause of women OR who have had experience in social work OR have legal knowledge.
- iii. One member shall be from amongst non-governmental organizations or associations committed to the cause of women OR a person familiar with the issues relating to sexual harassment.

**Note – 1.** The Name of the Members of IC is mentioned in **Annexure A** of this Policy and any change in such composition shall be reflected in the policy.

**2.** The IC shall hold office for a period of 3 years from the date of nomination.

## **5. RESPONSIBILITIES OF INTERNAL COMMITTEE**

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

- iv. Disseminate procedural & functional knowledge among IC in areas of investigation & report writing.
- v. Create & maintain a uniform system of the central repository of investigation reports & documents.
- vi. Ensure compliance with regulatory norms by keeping track of any amendments to the policy and updating it periodically.
- vii. Submit an annual report to the Company by summarizing cases and action taken in such a form and at such a time as may be prescribed under the said act.

## **6. TIMELINES**

Submission of the Complaint	Within 3 months (three months) of the last incident occurred.
Notice to the Respondent	Within 7 working days of receiving a copy of the complaint.
Respondent to file the reply	Within 10 working days of receipt of the Complaint.
Completion of Inquiry	Within 90 days of receipt of the Complaint
Submission of Report by IC	Within 10 days of completion of the inquiry
Appeal	Within 90 days of IC's recommendation

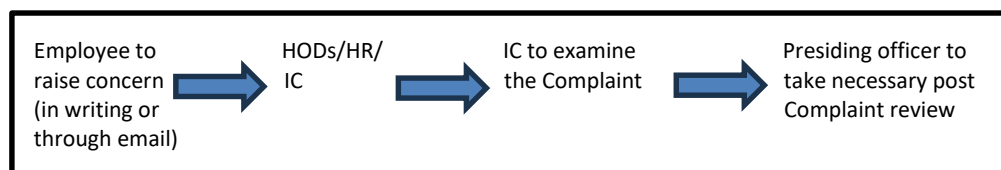
## **7. GRIEVANCE PROCEDURE AND THE INQUIRY PROCESS**

Any aggrieved person may make, in writing or through email on [posh@smartworlddevelopers.com](mailto:posh@smartworlddevelopers.com), a complaint of sexual harassment at workplace to the respective Head of Department/Regional HR/Internal Committee giving details of the sexual harassment incident within a period of 3 months from the date of incident and in case of a series of incidents, within a period of 3 months from the date of last incident, which may be further extended for an additional period of 3 months, if circumstances warrant such extension in the opinion of the Internal Committee.

1. The Presiding Officer or any Member of the Internal Committee can render reasonable assistance to the person for making a complaint in writing, in case they are unable to do so.
2. In case where the aggrieved person for any other reason is unable to make a complaint, a complaint may be filed by any other person who has knowledge of the incident, with the aggrieved person's written consent.
3. On receipt of complaint, the Internal Complaint Committee shall decide the place and time for hearing the complaint and shall intimate the date, time and place of hearing to the Complainant and Respondent. The Internal Committee shall follow the principle of natural justice while handling such complaints.
4. The Complainant shall make a complaint to the Internal Committee through the following mode:
  - a. Copy of complaint along with supporting documents and names and address of witness shall be sent to the Internal Committee.
  - b. On receipt of such a complaint, the Internal Committee shall provide a copy along with supporting documents of such complaints to the Respondent within 7 working days.
  - c. The respondent shall file a reply within 10 working days of receipt of the complaint along with a list of documents, names and addresses of witnesses.
  - d. The Internal Complaint Committee shall investigate in detail into the matter of the complaint. The Internal Complaint committee shall have the right to call the person against whom the complaint is made or any other witnesses as and when necessary.

- e. The Internal Complaint Committee shall have the right to terminate the inquiry or give an *ex-parte* decision on the complaint, if the Respondent or complainant remains absent for 3 consecutive hearings, without sufficient cause. Provided that such a termination or ex-parte order may not be passed without giving notice in writing, fifteen days in advance, to the party concerned.
- f. The Internal Committee must complete its investigation within a period of 90 days (Ninety days) from the date of receipt of the Complaint.
- g. The parties shall not be allowed to bring any legal practitioner to represent them in their case at any stage of the proceedings in front of the Internal Committee.
- h. For conducting the inquiry, the quorum of the Internal Committee shall be 3 members including the Presiding Officer.
5. The Internal Committee may before initiate an inquiry, and at the aggrieved person's request, attempt to settle the matter through conciliation. However, the Internal Committee shall ensure that:
  - a. Monetary settlement will not be made as a basis of conciliation.
  - b. Where a settlement has arrived, the settlement terms shall be signed by both the parties and shall be provided with a copy of it.
6. Where a settlement has arrived as mentioned hereinabove, no further inquiry shall be conducted by the Internal Committee.
7. The Internal Committee may during such investigation may exercise the power of a Civil Court, vested in it, in respect of:
  - a. summoning and enforcing the attendance of any person and examining him under oath; and
  - b. requiring discovery and production of documents; and
  - c. any other prescribed matter.
8. During such an inquiry, upon written request by the aggrieved person, the Committee may at its discretion recommend:
  - a. to transfer the aggrieved person or the respondent to any other workplace; or
  - b. grant leave to the aggrieved person of up to three months in addition to the leaves he / she is otherwise entitled.

Provided the aggrieved person must tender justified reason for such transfer or leave, such as threat to work in the workplace etc.



## **8. ACTION**

1. The Committee shall, on completion of the Inquiry, submit a Report of its findings within 10 days from the date of completion of the Inquiry and such Report shall be made available to the aggrieved person and the Respondent.
2. If the allegations against the Respondent are not proved, the Committee may recommend that no action be taken in the matter.
3. If the Committee comes to the conclusion that the allegations against the Respondent have been proved, it may recommend any of the following actions commensurate with the gravity of the act of the Respondent:

- a. Issue Letter of reprimand or warning
- b. Take action for sexual harassment as a misconduct.
- c. Direct the Respondent to tender written apology to the aggrieved person,
- d. Withhold promotions / increments of the Respondent,
- e. Terminate the services / Dismissal.
- f. To deduct from salary / wages of the Respondent or issue direction for payment; such sum as it may be considered appropriate to be paid to the aggrieved person as it may determine.

## **9. APPEAL**

If a complainant or respondent is not satisfied with the Internal Committee's (IC) recommendations in a POSH (Prevention of Sexual Harassment) case, they have the right to appeal to a court or tribunal as per the applicable Service rules or as per the law. This appeal must be filed within 90 days of receiving the IC's recommendations in accordance with the process as outlined in Section 18 of the POSH Act, 2013.

## **10. 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 complainant, the respondent and others who may report incidents of sexual harassment, confidentiality will be maintained throughout the investigation process to the extent practicable and appropriate under the circumstances.

## **11. AWARENESS**

1. All employees shall have access to this Policy and clarification related to the Policy shall be addressed by the HR Department.
2. A brief shall be given to all existing employees regarding the features of this Policy immediately on formulation of the Policy and to new employees during their induction.
3. The Company undertakes to comply with all such requirements as are contemplated under Section 19 of the Act to ensure that all employees are provided with a safe working environment.
4. Company shall display notices showing the names of the members of the Internal Committee at its establishment at a conspicuous place.

## **12. FALSE ACCUSATION**

1. The complaint of Sexual harassment made by any employee shall be taken up with utmost seriousness by Company. However, there shall be zero tolerance for any false accusation.
2. If the Internal Complaint Committee comes to a conclusion that the allegation was made with malicious intent or the aggrieved person or any other person making the complaint on behalf of the aggrieved person produced false or forged or misleading documents to prove his/her case, the Internal Complaint Committee may recommend action to be taken against

the person who has made the complaint in accordance with the CoC Policy of the Company, including termination of service/employment, however malicious intent has to be established after an inquiry, before any action is recommended. A mere inability to substantiate a complaint or provide adequate proof would not attract action as provided herein. A similar recommendation for taking action would be recommended against any witness to whom the Internal Complaint Committee concludes that he/she has given false evidence or produced forged or misleading documents.

## **13. MISCELLANEOUS**

1. Company may make any alteration or amendment or rescind any of the clauses of this Policy as and when it finds it necessary to do so, if it complies with the Act. Any such alterations or amendments or rescinding will be intimated to the employee.
2. Nothing contained in these rules shall operate in the derogation of any law for the time being in force or to the prejudice of any right of any employee under any other law.
3. The Internal Complaint Committee shall prepare an annual report with the following details and shall submit the same to the Company to include in its Annual report:
  - a. Number of complaints of Sexual harassment received during the year.
  - b. Number of complaints disposed-off during the year.
  - c. The number of cases pending for more than 90 days and the reasons thereof.
  - d. Number of workshops or awareness program against sexual harassment carried out.
  - e. Nature of action taken by the employer.

The above-mentioned Annual report shall be prepared by the Internal Committee and shall be submitted to the Board of Directors of the Company before the end of the financial year.



**Annexure – A**

**INDEX OF THE MEMBERS OF INTERNAL COMMITTEE**

Sr. No.	Name	Title	Email Id
1.	Mrs. Minal Sood	Presiding officer	<a href="mailto:minal.sood@smartworlddevelopers.com">minal.sood@smartworlddevelopers.com</a>
2.	Mr. Rajat Jain	Member	<a href="mailto:rajat.jain@smartworlddevelopers.com">rajat.jain@smartworlddevelopers.com</a>
3.	Mrs. Shreya Goel	Member	<a href="mailto:shreya.goel@smartworlddevelopers.com">shreya.goel@smartworlddevelopers.com</a>
4.	Ms. Purnima Nagal	Member	<a href="mailto:purnima.nagal@smartworlddevelopers.com">purnima.nagal@smartworlddevelopers.com</a>
5.	Mrs. Nivedita	External Member	<a href="mailto:nivedita72@yahoo.com">nivedita72@yahoo.com</a>