



HR – POSH POLICY - Anti Sexual Harassment Policy

VERSION – 1

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INTENT

- (i) This policy has been formulated in accordance with the provisions of the “Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013” (“**Act**”) read with the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Rules, 2013 (“**Rules**”), which were legislated for safeguarding women employees from Sexual Harassment (*defined below*) at the Workplace (*defined below*) and for the redressal of complaints of Sexual Harassment and connected matters (“**Policy**”).
- (ii) Accordingly, while the Policy covers all the key aspects of the Act, for any further clarification, reference shall always be made to the Act and in case of any conflict or contradiction, the provisions of the Act shall prevail. Further, any matter which has not been specifically dealt or discussed under this Policy shall be dealt with in the manner prescribed under the Act.
- (iii) RMZ and its group entities, including its joint venture partners and its Affiliates (each a “**Company**”) are committed to ensuring that the work environment is conducive to fair, safe and harmonious relations between employees. Harassment (including that is sexual in nature), unlawful discrimination (of any type) and intimidation emanating as a result thereof are strictly prohibited at the Workplace.
- (iv) All Company Personnel (*defined below*) should take the time to ensure they understand what types of behaviour are unacceptable under this Policy and how the Company will handle complaints of Sexual Harassment. **Ignorance of the Policy will not be a valid defense in case of any non-compliance or violation thereof.**

1. APPLICABILITY

- (i) This Policy comes into effect immediately with effect from March 01, 2023 and with the purpose of ensuring there is no Sexual Harassment against women, applies to any person employed at a Workplace, whether regular,



temporary, ad hoc, daily wage worker, directly or through an agent, or a contractor, whether for remuneration or not, or working on a voluntary basis or otherwise, whether the terms of employment are express or implied and includes apprentices, trainees, probationers and persons called by any other such name (each, a “**Company Personnel**”).

2. IMPORTANT TERMS

- (i) An “**Aggrieved woman**” is defined as “in relation to a Workplace, a woman, of any age whether employed or not, who alleges to have been subjected to any act of Sexual Harassment by the Respondent (*defined below*)”.
- (ii) “**Control**” means the beneficial ownership directly or indirectly of more than 50% of the voting securities of such entity or the control of the majority of the composition of the Board or the principal governing body or the power to direct or influence the management or policies of such entity directly or indirectly, whether through the ownership or voting of securities, by contract or otherwise; and the terms “**Controlling**”, “**Controlled**”, “**Controls**” and / or related cognate expressions shall have meanings correlative to the foregoing.
- (iii) “**RMZ**” means Millennia Realtors Private Limited, a company incorporated under the laws of India and Associated Professional Services, a partnership firm having office at The Millenia, 12 & 14th Floor, Tower-B, 1 & 2 Murphy Road, Ulsoor, Bangalore- 560008.
- (iv) “**Respondent**” is “the person against whom the Aggrieved Woman has made a complaint of Sexual Harassment”.
- (v) “**Sexual Harassment**” includes any one or more of the following unwelcome acts or behaviours (*whether directly or by implication*), occurring on any medium, whether physical or virtual, namely:



- a. Physical contact or advances; or
- b. Demand or request for sexual favours; or
- c. Making sexually coloured remarks; or
- d. Showing pornography; or
- e. Any other unwelcome physical, verbal or non - verbal conduct of a sexual nature.

In addition, any of the following actions, if they occur in relation to an act of sexual harassment, could also amount to sexual harassment:

- f. Implied or explicit promise of preferential treatment in employment; or
 - g. Implied or explicit threat of detrimental treatment in employment; or
 - h. Implied or explicit threat about present or future employment status; or
 - i. Interference with work or creating an intimidating or offensive or hostile work environment; or
 - j. Humiliating treatment likely to affect her health or safety.
- (vi) **“Workplace”** for the purposes of this Policy includes (i) wherever the Company carries its operations including all offices, project sites and off-sites of the Company; (ii) Company sponsored events and places visited by the Company Personnel, where services are rendered or arising out of or during the course of employment or engagement, as the case may be, including transportation, if any, provided by the Company for undertaking such journey; and (iii) any digital platforms such as Microsoft Teams, Zoom, Skype, Cisco Webex, etc., or any official page of the Company or any social media platform such as LinkedIn, Instagram, Facebook, Twitter etc., utilized by any Company Personnel, in the course of their employment or engagement with the Company.

3. ROLES & RESPONSIBILITIES

- (i) Responsibilities of Individual: It is the responsibility of all to respect the rights of others and to never encourage harassment (including Sexual Harassment). It can be done by:



- a. Refusing to participate in any activity which constitutes harassment (including Sexual Harassment);
- b. Supporting the person to reject unwelcome behavior (including behaviour of sexual nature);
- c. Acting as a witness if the person being harassed decides to lodge a complaint.

All are encouraged to advise others of behavior that is unwelcome. Often, some behaviors are not intentional. While this does not make it acceptable, it does give the person behaving inappropriately, the opportunity to modify or stop their offensive behavior.

- (ii) Responsibilities of Managers: All managers must ensure that nobody is subject to harassment (including Sexual Harassment) and there is equal treatment. They must also ensure that all employees understand that harassment in any form (including Sexual Harassment) will not be tolerated; that complaints will be taken seriously; and that the Aggrieved Woman/ Complainant (*defined below*), Respondent(s), or witnesses are not victimized in any way.

4. ELIGIBILITY

- (i) A complaint can be filed under the Policy by (a) any Aggrieved Woman who is a victim of Sexual Harassment at the Company's Workplace; or (b) on behalf of an Aggrieved Woman by the persons specified in Clause 8 below (the "**Complainant**").

5. THIRD PARTY HARASSMENT

- (i) Where Sexual Harassment of the Aggrieved Woman occurs as a result of an act or omission by any third party, including the Company's vendors or contract labour deployed by such vendors, customers or a visitor, then the Company shall take all necessary and reasonable steps to assist the affected Aggrieved Woman to lodge a complaint with the appropriate forum against



such third party and/or shall also take action against such third party as per this Policy and the Act and subject to the terms of contract, if any, with the employer of the third party.

- (ii) Where Sexual Harassment occurs as a result of an act or omission by a Respondent who is employed on the rolls of the Company against a third party including the Company's vendor and/or its employees, customer or a visitor ("**External Party**") in the course of official duties, inside or outside the premises of the Company, then the Company shall, take such action against such Company Personnel employee as may be appropriate, based on due inquiry as per the process set out under this Policy and the Act and subject to the terms of contract, if any, with the employer of the External Party.

6. REDRESSAL COMMITTEE FOR SEXUAL HARRASSMENT

- (i) Complaints of Sexual Harassment will be promptly and thoroughly investigated by a committee to be known as the "Internal Committee" ("**IC**"), which shall be constituted in accordance with the Act as set out below. The IC will comprise a minimum of the following 4 (four) members:
 - a. The presiding officer of the IC shall be a woman employed at a senior level at the workplace ("**Presiding Officer**").
 - b. 2 (two) members of the IC will be selected from among the employees, preferably who are committed to the cause of women or have experience in social work or have legal knowledge.
 - c. 1 (one) member of the IC will be selected from a Non-Governmental Organization or association committed to the cause of women or a person familiar with issues relating to Sexual Harassment ("**External Member**").
- (ii) At least one half of the members of the IC will be women.
- (iii) The details of the members of the IC are available at <https://www.rmz.com/>, company's intranet portal (HONO) besides the display on the notice boards at the Workplace and can be contacted at redressalcommitte@rmz.com.



- (iv) The Presiding Officer and every member of the IC will hold office for the period that they are appointed for, which will not exceed 3 (three) years from the date of their nomination as may be specified by the Company, and can be extended for a further period, at the discretion of the Company.
- (v) The Company shall, from time to time, review the membership of the IC and make appropriate changes (increase the number of IC members, if required, for any office/ location, upon notification to the employees) so long as the IC is fully compliant with the provisions of the Act.
- (vi) Based on the nature/ gravity/ complexity of the complaint, the Company reserves the right to appoint additional member(s) on the panel of IC, to address such specific complaints.
- (vii) The IC will investigate the alleged Sexual Harassment while maintaining a strict level of confidentiality.
- (viii) For purpose of making an inquiry, the IC shall have the same powers as are vested in the civil court under the Code of Civil Procedure, 1908, which will include the power to summon and enforce the attendance of any person, whether in person or virtually, require the discovery and production of documents, and regarding any other matter which may be required during the investigation into a complaint under the Policy.
- (ix) Subject to applicable laws, the IC is empowered to conduct any inquiries under this Policy via video conferencing on a medium of choice. All employees agree and acknowledge that it shall be the sole prerogative of the IC, whether to conduct a physical or virtual hearing.

7. MANNER OF FILING THE COMPLAINT OF SEXUAL HARASSMENT

- (i) All complaints shall be submitted in writing with full details of the incident, by writing/ mail addressed to all or any member of the IC. Where a complaint cannot be made in writing, the Presiding Officer or any member of the IC, as the case may be, will render all reasonable assistance to the



Aggrieved Woman or the Complainant, for making the complaint in writing.

- (ii) If the Aggrieved Woman is unable to make a complaint on account of her physical incapacity, a complaint may be filed by:
 - a. Her relative or friend;
 - b. Her co-worker;
 - c. An officer of the National Commission for Women or State Women's Commission; or
 - d. Any person who has knowledge of the incident, with the written consent of the Aggrieved Woman.
- (iii) If the Aggrieved Woman is unable to make a complaint on account of her mental incapacity, a complaint may be filed by:
 - a. Her relative or friend;
 - b. A special educator;
 - c. A qualified psychiatrist or psychologist;
 - d. The guardian or authority under whose care she is receiving treatment or care; or
 - e. Any person who has knowledge of the incident jointly with her relative, friend, special educator, qualified psychiatrist or psychologist, guardian or authority under whose care she is receiving treatment.
- (iv) If the Aggrieved Woman is dead, a complaint may be filed by any person who has knowledge of the incident, with the written consent of the Aggrieved Woman's legal heir.
- (v) If the Aggrieved Woman is unable to make a complaint on account of any



other reason, a complaint may be filed by any person who has knowledge of the incident, with her written consent.

The personnel filing complaint on behalf of the Aggrieved Woman (as referred in Clause 8 (ii) to (v) above) will be referred to as '**Complainant**'.

- (vi) On receipt of the complaint, the Presiding Officer shall evaluate if any of the members of the IC are (a) disqualified as per the provisions of the Act; (b) unavailable to fulfil its obligations as an IC member due to *inter alia* any commitments, physical unavailability, leave, ailment etc.; (c) is involved in or closely connected with the complaint so as to result in a conflict of interest with that of the parties involved (including where the IC member is either the Aggrieved Woman or Complainant or the Respondent or related to either the Aggrieved Woman/ Complainant/ Respondent or is reporting to the Aggrieved Woman/ Complainant/ Respondent or is the supervisor/ manager of the Aggrieved Woman/ Complainant/ Respondent or having personal knowledge of the incident or the circumstances leading to the filing of the complaint).
- (vii) In the event of a conflict of interest, the Presiding Officer may ask the Company to replace such members on the IC for the investigation into the relevant complaint. The IC members will also have the obligation to report to the Company representative, about any conflicts that they have with any particular matter.

8. CONCILIATION PROCEEDINGS

- (i) Before initiating an inquiry into a Sexual Harassment complaint and upon request of the Aggrieved Woman (whether directly or through the Complainant), the IC can take steps to settle the matter between the Aggrieved Woman and the Respondent through conciliation, provided that no monetary settlement shall be the basis of such conciliation.
- (ii) Where a settlement has been arrived at between the parties, as a result of such conciliation, no further inquiry shall be conducted by the IC, but it shall



record the settlement so arrived at and forward the same to Company to take action as specified in the recommendation. Copies of the settlement must also be provided to both the parties.

- (iii) Where the Complainant and/ or the Aggrieved Woman informs the IC that any term or condition of the settlement arrived at is not complied with by the Respondent, the IC will proceed to make an inquiry into the complaint in accordance with this Policy.

9. ACTION DURING PENDENCY OF INQUIRY

- (i) The Company shall, pending completion of the inquiry, implement any one or more of the following interim measures recommended by the IC on a written request made by the Aggrieved Woman (whether directly or through the Complainant):
 - a. Transfer the Aggrieved Woman or the Respondent to another office or unit of the Company; or
 - b. Grant leave to the Aggrieved Woman for up to 3 (three) months in addition to leave already entitled; or
 - c. Restrain the Respondent from reporting on the work performance of the Aggrieved Woman or writing her confidential report and assign the same to another officer.

Once the recommendations of interim relief are implemented, the Company will inform the IC regarding the same.

10. KEY STEPS AND TIMELINES FOR FILING AND REDRESSAL OF COMPLAINTS

- (i) On receipt of such a complaint, the IC will immediately arrange to fully investigate all relevant details of the matter. It will do so with all possible care, sensitivity, and discretion in protecting the sensibilities of the effected employee. The Respondent, who has allegedly committed the offence of Sexual Harassment, would be given all reasonable opportunity to be heard by the IC.



Subject to the Clause 9 above, any complaint of Sexual Harassment will be redressed in the following manner:

Step	Action	Time Period
Step 1	The Aggrieved Woman/ Complainant files a complaint in writing to the IC.	Within 3 (three) months from the date of the incident or in the case of a series of incidents, within a period of 3 (three) months from the date of the last incident. The IC may extend this time period for an additional period of 3 (three) months, if it is satisfied that there were circumstances that prevented the Aggrieved Woman/ Complainant from filing the complaint within the said time period.
Step 2	On receipt of the complaint, the IC sends the complaint to the Respondent.	Within 7 (seven) working days of receipt of the complaint.
Step 3	The Respondent files a reply to the complaint (with a list of documents and the names and addresses of witnesses) to the IC.	Within 10 (ten) working days of receiving the copy of the complaint, as indicated by the IC.
Step 4	The IC initiates action and completes its inquiry. Where both the parties are employees on the rolls of the Company, a copy of the findings shall be made available to both the parties, enabling them	Within 90 (ninety) days of the complaint being filed.



Step	Action	Time Period
	to make a representation against the findings before the IC.	
Step 5	The IC submits a report of its findings and recommendations to the Company for implementation (a copy of the report is to be provided to both parties).	Within 10 (ten) days of the completion of the inquiry.
Step 6	The Company implements the recommendations of the IC.	Within 60 (sixty) days of the receipt of the report of the IC.
Step 7	The Complainant/ Aggrieved Woman or Respondent files an appeal, if he/she wishes, to the internal appellate committee.	Within 70 (seventy) days of the receipt of the report of the IC.
Step 8	The Complainant/ Aggrieved Woman or Respondent files an appeal, if he/she wishes, to a court or tribunal in accordance with the provisions of the Act against breach	Within 90 (ninety) days of the receipt of the report of the IC.



Step	Action	Time Period
	of the terms of conciliation, or recommendations of the IC or non-implementation of recommendations by the Company.	

- (ii) Any complaints made beyond or outside the time limit provided by the Act, may be taken up by the Company, at its sole discretion and such complaints will be handled as per the disciplinary policy of the Company, by such authority as appointed by the Company.
- (iii) Notwithstanding the foregoing, all Aggrieved Women or the Complainant(s), as the case may be, are encouraged to file Sexual Harassment complaints with the IC as soon as possible and within the timelines indicated under the Act, so that the matter can be resolved/ redressed at the earliest.

11. SALIENT FEATURES AND MANNER OF INQUIRY INTO THE COMPLAINT

- (i) The IC will conduct inquiry into the complaint in accordance with the principles of natural justice.
- (ii) While conducting an inquiry, a minimum of 3 (three) members of the IC including the Presiding Officer and the External Member should be present.
- (iii) The parties shall not be allowed to bring in any legal practitioner to represent them in their case, at any stage of the proceedings before the IC. The Company will have the right to seek legal advice or consult an expert/subject matter expert on the complaint and/or any matter pertaining to Sexual Harassment filed by the Aggrieved Woman/ Complainant to ensure compliance with the provisions of the Act and/ or any related matter.



- (iv) The IC may give an *ex-parte* decision or terminate the inquiry proceedings, if the Aggrieved Woman/ Complainant or the Respondent fails to appear before the IC for 3 (three) consecutive hearings without sufficient cause. However, the IC will give a prior written notice of 15 (fifteen) days to the concerned party before taking any such decision.

12. PENALTIES FOR SEXUAL HARASSMENT

- (i) If any Company Personnel is found to be guilty of Sexual Harassment by the IC or of any of the actions set out in the Policy, the Company shall impose or cause to be imposed, one or more of the following penalties against such Company Personnel (the IC should record its reasons in writing): (a) Censure; (b) Warning; (c) Fine; (d) Loss of pay; (e) Loss of seniority; (f) Termination of employment with or without notice or compensation in lieu of notice; (g) Counseling or carrying out community service; (h) Appropriate legal proceedings; and/ or (i) Written apology.
- (ii) In addition to the above, the IC may deduct or cause to be deducted, a sum from the salary or wage of the Respondent (if the Respondent is found guilty) of such amount as it may consider appropriate for payment to the Aggrieved Woman or to her legal heirs.
- (iii) If the IC arrives at a conclusion that the allegation of Sexual Harassment against the Respondent has not been proved, then it may recommend to the Company that no action be taken in the matter.

13. OTHER ACTS OR BEHAVIOR WHICH ARE PUNISHABLE UNDER THE ACT

- (i) Apart from Sexual Harassment, if any Company Personnel commits the following acts, such person shall also be punishable with penalties, as set out previously, on the grounds of misconduct:
 - a. Making false allegations of Sexual Harassment, with malicious intent and knowledge that such allegation is false or producing false evidence to justify such complaint;



- b. Giving false evidence or producing false documents as a witness to any proceedings of the IC;
 - c. Breaching the statutory duty of maintaining confidentiality of information relating to the inquiry proceedings of the IC, by divulging such information to any unauthorized person, including, but not limited to any Company Personnel; and/or
 - d. Victimizing, intimidating or influencing any person, witness or any other persons seeking redress under this Policy whether directly or indirectly. The Company will ensure that the Complainant/ Aggrieved Woman or a person who has given evidence as part of an inquiry, in good faith, is protected and not victimized or discriminated against in his/her career in the Company.
- (ii) It is clarified that the mere inability to substantiate a complaint or provide adequate proof will not be treated as a false complaint.
 - (iii) Any breach of instructions provided by the IC in connection with virtual hearings will be treated as an act of misconduct which can lead to disciplinary action.

14. INTERNAL APPEAL MECHANISM

- (i) Any person aggrieved by:
 - (a) Findings of the IC that the allegation of Sexual Harassment was not proved; or
 - (b) Recommendation of the IC that action must be taken against the Respondent or to award monetary compensation to the Aggrieved Woman; or



- (c) Findings, and resulting recommendations, of the IC that there was malicious intent on part of the Aggrieved Woman/ Complainant, or that the witness produced forged or misleading documents; or
- (d) Recommendation of the IC that penalty must be imposed for the publication or making known of the contents of the complaint or the inquiry proceedings; or
- (e) Non-implementation of the recommendations of the IC;

may prefer an appeal within 70 (seventy) days of the receipt of the report of the IC to the internal appellate committee ("**Appellate Committee**") if constituted within the organization.

- (ii) The Appellate Committee shall consist of minimum 3 (three) members and shall be headed by a woman, and all be comprised of majority of women.
- (iii) The Appellate Committee shall decide the appeal, in accordance with the principles of natural justice, in not more than 15 (fifteen) days from the date of receipt of appeal.
- (iv) Filing of an appeal before the Appellate Committee does not restrict an aggrieved from filing an appeal before the authorities prescribed under the Act.

15. GENERAL

- (i) In the event that the Complainant/ Aggrieved Woman opts to file a complaint under the India Penal Code, 1860 ("**IPC**") or any other law for the time being in force, in relation to an alleged offence of Sexual Harassment, the Company will (a) assist the Aggrieved Woman/ Complainant in filing such complaint, and (b) initiate action against the perpetrator (under the IPC or any other law



for the time being in force), if the Aggrieved Woman/ Complainant so desires.

- (ii) All Company Personnel have a duty to cooperate in the Company's investigation of alleged Sexual Harassment. Failure to cooperate or deliberately providing false information during an investigation will be grounds for disciplinary action, up to and including termination.
- (iii) The Company will not retaliate, nor will it tolerate retaliation against any Company Personnel or an Aggrieved Woman/ Complainant who files a complaint of Sexual Harassment in good faith or is a witness in the IC proceedings.
- (iv) All proceedings, documents and records maintained under the Policy, including the names of the Aggrieved Woman, Complainant, Respondent and witnesses shall be confidential and shall be dealt with in the manner provided under the Act and shall not be published or made known to public or media. All persons involved in the proceedings under the Policy including the parties, witnesses, IC members and any other Company Personnel (including the Heads of Departments and senior executives) who becomes aware of any incident of Sexual Harassment, whether directly or indirectly, shall be under a duty to respect and maintain confidentiality. Further care should be taken that the name, address, identity or any other particulars that could lead to the identification of the Aggrieved Woman, Complainant, the Respondent or the witnesses should not be disclosed.
- (v) Please note that any derogatory or defamatory statements against *inter alia* the Company, its representative, IC or the opposite party, prior to, during or after the completion of the inquiry is also expressly prohibited.
- (vi) In the event any proceedings under this Policy are conducted virtually via digital platforms, care should be taken that the obligation to maintain confidentiality is not breached. Further, no other persons except for the individual who has been asked to join the virtual meeting, should be present in the room or be allowed to overhear the discussion/ conversation. Any breach of this obligation will be subject to disciplinary action by the



Company.

- (vii) Subject to any local laws (if any), the Company may electronically record the proceeding of the meeting(s) / enquiry proceeding(s) either in audio format and/ or video format. It is however clarified that employees are neither allowed to make electronic recordings of any meetings conducted under this Policy nor demand a copy thereof from the IC and/ or the Company. Recording any meetings electronically by any employee will be considered as a serious misconduct under the internal rules/ policies of the Company and/ or this Policy and will attract disciplinary action against him under the Company's internal policies and / or applicable laws.

NOTE: This Policy is formulated in keeping with the guidelines and norms prescribed by the Courts in India and in furtherance of the Act which has been notified with effect from December 9, 2013. These procedures may be regularly updated, audited and reviewed by the Company without prior notice, subject to compliance with the applicable laws. Any amendments to this Policy will be updated on the <https://www.rmz.com/> and will be binding on all the Company Personnel.