



GODFREY PHILLIPS
—INDIA LIMITED—

Policy on Prevention, Prohibition and Redressal of Sexual harassment of Women at Work

Doc. No.: Policy-GPI/HRPOLICY - 001

Effective Date: Since Inception

Revision Date: 05.12.2024

Version: 6.0

Approved by

CHRO


Sign & Date

Policy on Prevention, Prohibition and Redressal of Sexual harassment of Women at Work

The below is in supersession to all the previous versions of Policy on Prevention, Prohibition and Redressal of Sexual harassment of Women at Work.

A. Background

Godfrey Phillips India Limited (hereinafter referred to as “the Company”) is committed to provide equal opportunity and a harassment free workplace notwithstanding race, caste, religion, colour, marital status, gender, sexual orientation, age, nationality and believes that sexual harassment as a form of misconduct undermines the integrity of employment related relationships. Thus in order to create such a safe and conducive work environment, this Policy has been framed, in line with the provisions of the “Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013” of India (hereinafter referred to as the “Act”¹) and existing rules framed thereunder namely the “Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Rules, 2013 (hereinafter referred to as the “Rules”).

B. Purpose and Scope

- a. The purpose of this policy is to provide protection against sexual harassment of women at workplace and the prevention and redressal of complaints of sexual harassment and matters related to it.
- b. This policy extends to the Company, its subsidiaries and all its employees; including individuals coming to the workplace for employment or for any other purpose whatsoever including but not limited to visitors, vendors, contractual resources and applies to any alleged act of sexual harassment against persons at workplace, whether the incident has occurred during or beyond office hours.

C. Important Definitions

- a. “Aggrieved Individual” means in relation to a workplace, a person, of any age, whether employed or not, who alleges to have been subject to any act of sexual harassment by the respondent and includes contractual, temporary employees and visitors.
- b. “Complainant” is any aggrieved individual (including a representative as more fully described under Rule 6 of the said Rules, if the aggrieved individual is unable to make a complaint on account of his/her physical or mental incapacity or death or otherwise) who makes a complaint alleging Sexual Harassment under this Policy.
- c. “Employee” as defined under the Act and means a person employed with the Company for any work on permanent, temporary, part-time, ad-hoc or daily wage basis, either directly or through an agent, including a contractor, who 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.
- d. "Employer" means person who are responsible for management, supervision and control of the workplace including appointment/removal/termination of employees and will include 'Director and General Manager', 'Chief Human Resource Officer (CHRO)', 'Chief Operation Office (COO) and Chief Executive Officer (CEO)'.
 - e. "Internal Committee" means and include an Internal Complaints Committee (hereinafter referred to as the "IC").
 - f. "Member" means a member of the IC.
 - g. "Presiding officer" means the presiding officer of the IC and shall be a woman employed at a senior level at the workplace amongst the employees.
 - h. "Respondent" means a person against whom a complaint of alleging sexual harassment has been made under this policy.
 - i. "Parties" means collectively the complainant and the respondent.
 - j. "Sexual Harassment" includes any one or more of the following unwelcome acts or behaviour (whether directly or by implication) namely:
 - i. Physical contact and advances; or
 - ii. A demand or request for sexual favours; or
 - iii. Making Sexually coloured remarks; or
 - iv. Showing pornography; or
 - v. Any other unwelcome physical, verbal or non-verbal conduct of sexual nature;
 - vi. Creating a hostile work environment for women by putting a women complainant (on sexual harassment) in disadvantageous position w.r.t. employment, associated privileges, benefits & career enhancement.

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

- i. Implied or explicit promise of preferential treatment in her employment; or
 - ii. Implied or explicit threat of detrimental treatment in her employment; or
 - iii. Implied or explicit threat about her present or future employment status; or
 - iv. Interferes with her work or creating an intimidating or offensive or hostile work environment for her; or
 - v. Humiliating treatment likely to affect her health or safety.
- k. "Workplace" means establishments, enterprises, institutions, offices, branches, premises, locations or units established, owned, controlled by the Company or places visited by the employees out of or during the course of employment including accommodation, transportation provided by the employer for undertaking such journey.

names and address of witnesses, if any which the complainant believes to be true and accurate.

F. Redressal Process

i. Conciliation

Before the IC initiates an inquiry, the complainant may request the IC to take steps to resolve the matter through conciliation provided no monetary settlement shall be made as basis of conciliation. If a settlement has been so arrived, the IC shall record the same and forward the same to the Employer and provide copies of the settlement to the aggrieved individual and the respondent. In such cases, no further inquiry shall be conducted by the IC.

ii. Inquiry

- a. In case where a settlement is not feasible or could not be arrived at through conciliation, the IC will conduct an inquiry into the complaint. Additionally an inquiry may also be initiated if the aggrieved person informs the IC that any terms of settlement has not been complied with by the respondent.
- b. The IC within 7 (seven) working days of receiving the complaint shall forward one copy thereof to the respondent for obtaining a response.
- c. The respondent within 10 (ten) working days of receiving the complaint shall file his/her reply to the complaint along with list of supporting documents, names and addresses of witnesses.
- d. The IC shall consider the reply from the respondent and initiate an inquiry. The complainant or the respondent to the complaint shall not be allowed to bring any legal practitioner to represent them at any stage of the proceedings before the IC. IC shall hear both the complainant and the respondent on date(s) intimated to them in advance and the principles of natural justice will be followed accordingly.
- e. In the event of failure to attend personal hearing before IC by the complainant or the respondent on three consecutive dates (intimated in advance) without sufficient cause, the IC shall have the right to terminate the inquiry proceedings or give an ex-parte decision. However, the IC shall serve a notice in writing to the party (ies), 15 (fifteen) days in advance, before such termination or the ex-parte order.
- f. The inquiry process shall be completed maximum within the period of 90 (ninety) days from the date of receipt of the complaint.
- g. The IC within 10 (ten) days from the date of completion of inquiry shall provide a report of its findings and recommendation(s) to Management and such report and recommendation(s) shall also be forthwith made available to the complainant(s) and respondent(s).



maliciously putting an allegation knowing it to be untrue and/or produces any forged or misleading document) will be subject to applicable disciplinary action.

J. Appeal

Any person aggrieved by the recommendation of IC may prefer an appeal under the relevant provisions of the Act and Rules.

K. Review

The Policy shall be reviewed by the Head of Human Resources Department annually or in compliance with the amendment made to the applicable Act or enactment of any other Act, Rules and Regulations made thereunder.

L. Version Control

Version	Change Description	Date
1.0	Original Policy	Since Inception
2.0	Definition of 'Employer' & Change in Internal Committee	25.9.2023
3.0	Change of External Member	3.5.2024
4.0	Updated of ICCs	15.5.2024
5.0	Induction of New ICC Members due to retirement/resignation from Organization	25.10.2024
6.0	To delete reference to Annexure to this policy and to add that ICC details will be communicated through office orders(s)	5.12.2024