

Inorbit Malls India Pvt Ltd		Document No	CHRPM-01
Corporate HR Policy Manual		Policy Manual Revision No.	PMRN – 22
Policy Title	Policy on Sexual Harassment	Revision Date	6th January, 2021
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1. PURPOSE

At Inorbit Malls India Pvt Limited (hereinafter referred to as “Inorbit Malls”), we desire to uphold a healthy and congenial working environment that enables employees to work without fear of prejudice, gender bias and sexual harassment.

2. SCOPE

This policy is applicable to all employees of Inorbit Malls India Pvt Ltd across all locations. References in this policy to "Employee" shall include Regular Employees and Consultants.

3. INTRODUCTION

We, at Inorbit Malls, value every employee and are committed to protect the dignity and respect of each employee. We have ‘zero tolerance’ for sexual harassment and any act of sexual harassment will invite serious disciplinary action.

This policy aims to inform the employees about what conduct constitutes sexual harassment and in the unlikely chance of such an occurrence, to enable a fair mechanism for dealing with such misconduct.

4. POLICY COVERAGE

‘Sexual Harassment’ is any unwelcome sexually determined behavior (whether directly or by implication), such as:

- Physical contact and advances
- A demand or request for sexual favors; whether verbal, textual, graphic, electronic or by any other action.
- Sexually colored remarks
- Showing pornography
- Any other unwelcome physical, verbal or non-verbal conduct of sexual nature whether by words, gestures or actions.

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5. INTERNAL COMMITTEE

An Internal Committee ("IC") has been constituted to consider and redress complaints of Sexual Harassment.

A. CORE INTERNAL COMMITTEE:

Chairperson	- Ms. Monali Mahajan, General Manager - Legal
Member	- Mr. Nitin Khanna, Chief Financial Officer
Member	- Ms. Ruchita Mishra, General Manager- Purchase
Member	- Ms. Kratika Tharani, Assistant General Manager - HR
Member	- Ms. Maya Bhat, Advocate (External Committee Member)

The IC will be responsible for

1. Receiving complaints of sexual harassment at the workplace
2. Initiating and conducting inquiry as per the established procedure
3. Submitting findings and recommendations of inquiries
4. Coordinating with the employer in implementing appropriate action
5. Maintaining strict confidentiality throughout the process as per established guidelines
6. Submitting annual reports in the prescribed format

B. COMMITTEE MEMBERS AT LOCATIONS:

ICs have been formulated for all locations. While the IC at corporate level will handle all complaints including the ones received at Corporate office, the representatives from the following locations of Inorbit Malls will be co-opted into the IC to cover complaints received at the respective locations of Inorbit Malls and shall be construed to be forming part of the IC for the respective location.

1. Vadodara
2. Bengaluru
3. Hyderabad
4. Malad
5. Vashi
6. Sahar

Details of Representative/SPOC from the respective locations are enclosed in Annexure A.

6. COMPLAINT PROCESS:

- I. Any employee who feels being sexually harassed directly or indirectly may submit a complaint of the alleged incident to the IC in writing any member of the Internal Committee in writing with his / her signature within 3 months from the date of the incident and in case of a series of incidents, within a period of 3 months from the date of the last incident.
- II. In the event where the victim has approached/communicated to anybody else other than the IC, then that concerned person to whom the same has been communicated, is required to inform only to the IC immediately and no one else without any delay. He or she should also ensure that confidentiality of the incident/victim is maintained and not disclosed to anybody else.

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- III. The IC will hold a meeting with the Complainant within a week of the receipt of the complaint. Thereafter, the person against whom complaint is made may be called for a deposition/preliminary inquiry before the IC and an opportunity will be given to him / her to give an explanation, where after, an “Enquiry” shall be initiated, conducted and concluded by the IC.
- IV. The IC shall immediately proceed with the Enquiry and communicate the same to the Complainant and person against whom complaint is made.
- V. In the event, the complaint does not fall under the purview of Sexual Harassment or the complaint does not constitute an offence of Sexual Harassment, the same would be dropped after recording the reasons thereof, and communicating about the same to the complainant and the person against whom the complaint has been made.
- VI. In order to ensure that this important matter is not trivialized, any complaint, which, in the opinion of the IC, is deliberately false or frivolous would be viewed very seriously.
- VII. The IC shall complete the Enquiry within a period of 90 days from the date of receipt of complaint and will submit the report within 10 days of completion of the Enquiry. The entire proceedings of the IC inquiry and details of any disciplinary action taken against any person in relation the complaint will remain confidential.

The complaint shall be submitted by complainant to the IC in writing or shall be submitted to the IC electronically by emailing the same at internalcommittee@inorbit.in. The complaint can also be physically submitted to any IC member.

The IC shall be governed by such rules as may be framed by Supreme Court Orders from time to time and by legislations that may be enacted on this subject from time to time.

Given the sensitive nature of cases of sexual harassment and their impact on the victim as well as the person against whom such allegations are leveled, Inorbit Malls is committed to maintaining confidentiality in relation to such complaints and the resultant Enquiry.

7. PENALTY CLAUSE: If the complaint is found to be true, the Employer will initiate any/all of the below mentioned actions:

- a) Warning letter
- b) Transfer of services
- d) Suspension of employment

8. AMENDMENT

The Company reserves the right to amend or modify this policy in whole or in part, at any time without assigning any reason whatsoever.

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Annexure A

To ensure all employees across locations are able to reach out to the IC as needed, the following representative are co-opted into the IC to cover the various location by the company.

Division	Site/Location	Committee Member
Shopping Malls	Baroda	Agnelo Fernandes Deputy General Manager- Operations
Shopping Malls	Bengaluru	Sharat Belavadi Centre Head
Shopping Malls	Hyderabad	Sharat Belavadi Centre Head
Shopping Malls	Malad	Vikas Sethi General Manager- Operations
Shopping Malls	Vashi	Virendra Singh Thakur Deputy General Manager - Operations
Shopping Malls	Sahar	Vikas Sethi General Manager- Operations