

Sexual Harassment at Workplace (Prevention, Prohibition and Redressal) Policy

Praxis Home Retail Limited is committed to fostering a healthy working environment that enables employees to work without fear of prejudice, gender bias and sexual harassment. Praxis Home Retail Limited's philosophy is to be a professional organization, encouraging growth of individuals irrespective of gender, religion, caste or community. Praxis Home Retail Limited endeavors to ensure a safe, secure and congenial work environment, so that employees can deliver their best without inhibition. Through all its policies, Praxis Home Retail Limited seeks to ensure that every gender should have equal opportunity and no preferential or discriminatory treatment is meted out to anyone on grounds of sex alone. In that context, the Praxis Home Retail Limited feels the need to spread awareness across the organization, to prevent gender related harassment or discrimination, and in the event of such an occurrence, provide recourse to the concerned individual. The company also believes that all employees of the company have the right to be treated with dignity. Sexual harassment at the work place or other than work place if involving the company's employees, is a grave offence and is, therefore, punishable.

Scope:

This Policy extends to all Company employees and is incorporated in the service conditions code of conduct of all employees. "Sexual Harassment" includes any one or more of the following unwelcome acts or behaviour (whether directly or by implication) namely:

Physical contact and advances a demand or request for sexual favours making sexually coloured remarks showing pornography; or any other unwelcome physical, verbal or nonverbal conduct of sexual nature.

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:

- Implied or explicit promise of preferential treatment in her employment
- Implied or explicit threat of detrimental treatment in her employment
- Implied or explicit threat about her present or future employment status
- Interference with her work or creating an intimidating or offensive or hostile work environment for her; or
- Humiliating treatment likely to affect her health or safety.

**Objective:**

This policy is consistent and designed to comply with the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (“**POSH Act**”) which came into effect from 9th December 2013. Goal of this policy is prevention and redress of sexual harassment. Praxis Home Retail Limited has adopted a policy of non-tolerance against any such conduct that violates the law. The policy is non-negotiable.

Main objective of this policy document is to establish a complaint redress mechanism to effectively deal with incidents of sexual harassment at work place and to resolve such complaints in a fair and timely manner. This policy covers not only sexual harassment at company premises, but other extension of workplace such as business trips, off site training programs, social events or seminars, trainings, conferences, and a functions including get together and picnics organized by the Company.

Applicability:

This policy is applicable to complaint of sexual harassment by and against employees of Praxis Home Retail Limited, as well as other vendors, temporary and contractual staff. It also includes any visitor in the company premises or any person who is a temporary resident of any of the accommodations or premises allotted by the Praxis Home Retail Limited.

This Policy shall be applicable to all permanent, temporary, casual, consultants, contract (either directly or through an agent including a contractor), probationers and interns including visitors if any.

Constitution of Internal Complaints Committee:

The Internal Complaints Committee shall consist of following members nominated by company:

- Presiding Officer: Shall be a women employed at senior level.
- Two employees having experience in Social work/Legal Committed to the cause of women.
- One member from NGO or Association committed to the cause of women/person familiar with the issues relating to sexual harassment.
- One-half of the total members nominated shall be women.
- The committee and the presiding officer will hold office only for period of 3 years.
- The external members (NGO/Association) shall be paid fees.

Role and Responsibilities:

The Committee will work towards creating an atmosphere promoting equality, non-discrimination and gender justice. It will promote and facilitate measures to ensure there is no hostile environment towards employees at the workplace. It will also monitor and review the implementation and effectiveness of sexual harassment policy. It will also act as highest point of escalation in case of complaint in Praxis Home Retail Limited.

Redressal process:

The inquiry will be conducted in accordance with the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, powers conferred by the Act and as per principles of natural justice. However with regards to men and others, complaint mechanism will be in accordance with code of conduct of the company.

The complaints can be received by:

1. A formal letter to any member of Internal Complaints Committee (ICC)
2. Aap Ki Aawaaz Phone Number/Hotline-022-71068222
3. Dedicated email address posh@praxisretail.in

Each complaint should at the minimum be specific as to:

- It is important that the aggrieved person keeps a written record of dates, time, details of the conduct and witnesses, if any.
- Nature of sexual harassment
- Identity of the person/s who is/are involved in the act/s of sexual harassment
- Facts and circumstances in support of the complaint

Inquiry into complaint

In all cases where the complainant is a woman, the ICC shall proceed to make inquiry into the complaint in accordance with the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, powers conferred by the Act and as per principles of natural justice. With regards to men complaint mechanism will be in accordance with code of conduct of the company/service conditions.

On completion of the inquiry, the ICC shall provide the inquiry report to the Company. It shall also make a copy of the findings available to the concerned parties to enable them to make representation against the findings before the ICC. Copy of the inquiry report shall be made available to complainant and defendant. Where the ICC arrives at a conclusion that charges of sexual harassment against the defendant are not proved, it shall recommend to the Company that no action is required to be taken in the matter.

Where the ICC arrives at a conclusion that the allegation against the defendant has been proved, it shall recommend to the Company to take action for sexual harassment as ‘misconduct’, resulting in disciplinary action based on this policy, as deemed fit.

Disciplinary Action:

Guidelines for Disciplinary Action:

- a) The Internal Complaints Committee will give recommendations on nature of disciplinary action to be taken in case the defendant is found guilty. The penalties listed below are indicative guidelines.
- b) Minor Punishment: Warning or censure in writing, withholding or stoppage of increments/promotion,



Fine Order to give a written apology to the aggrieved women, sign a bond of good behavior Negative impact on performance appraisal, withdrawal of company provided facilities, Transfer, Debar from differentiated “Reward & Recognition” programs.

- c) Major Punishment: Debarring from supervisory duties, reverting, demotion, termination/ discharge from services, dismissal without notice or any compensation in lieu of notice, compensation to the victim through deduction from the salary of the person found guilty.

In addition to above, the Internal Complaints Committee may also recommend providing gender sensitization counselling to the person found guilty.

- d) Penalty in Case of a Second Offence:

For a second or repeated offence, the Internal Complaints Committee should recommend an enhanced penalty and take stricter disciplinary action against defendant.

Criminal Proceedings:

Where such conduct amounts to a specific offence under the Indian Penal Code or under any other law, the Company shall initiate appropriate action in accordance with law by making a complaint with the appropriate authority.

Third Party Harassment:

Where sexual harassment occurs by any third party or an outsider, the management will take all reasonable steps to assist the affected employees in terms of support and preventive action.

False/ Malicious Complaints as per the POSH Act:

A false/ malicious complainant is treated just like a guilty respondent and similar penalties could be recommended by the ICC.

Version Control:

Manager, People Officer of Praxis Home Retail Limited shall be the custodian of this Policy. The policy shall be reviewed on a need basis by the internal complaints committee of Praxis Home Retail Limited; any revisions to the existing policy will require approval of the Manager, People Officer.
