

POLICY AGAINST SEXUAL HARASSMENT AT WORKPLACE

I. COMMITMENT:

The Policy has been framed in accordance with the provisions of "The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013" and rules framed thereunder (hereinafter "the Act"). Accordingly, while the policy covers all the key aspects of the Act, for any further clarification if needed, reference shall always be made to the Act and the provisions of the Act shall prevail.

In Compliance with "The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013" Our KW Group of Companies as named below in tabular form:-

S. No.	Name of Companies
1.	K WORLD ESTATE PRIVATE LIMITED
2.	KW HOMES PRIVATE LIMITED
3.	K WORLD DEVELOPERS PRIVATE LIMITED
4.	BECON CONSTRUCTIONS PRIVATE LIMITED
5.	ACCURATE INFRA DEVELOPERS PRIVATE LIMITED
6.	DINGLE BUILDCONS PRIVATE LIMITED
7.	KW DREAM HOMES CONSORTIUM PRIVATE LIMITED
8.	KW INFRABUILD PRIVATE LIMITED
9.	MADHYAM CONSTRUCTION COMPANY PRIVATE LIMITED
10.	MADHYAM HOUSING PRIVATE LIMITED
11.	EESHAN CORPORATION LIMITED
12.	MADHYAM HOUSING SOLUTIONS PRIVATE LIMITED
13.	KW AGRO PRIVATE LIMITED
14.	KW POWER PRIVATE LIMITED
15.	KW SECURITY AND SERVICES PRIVATE LIMITED
16.	KW BUILDCONS PRIVATE LIMITED
17.	OBSERVER DAWN MEDIA & ENTERTAINMENT PRIVATE LIMITED

are under obligation to abide by the policy and to provide a safe working place free from gender based discrimination exploitation, sexual harassment, providing protection to female staff against sexual harassment and speedy and unbiased redressal of complaints of sexual harassment and matters related to it in a timely manner.

The top management comprising of members/promoters and directors are given underneath in the table and representing the Companies above mentioned.

S. No.	Name	DIN	Address	Father's Name
1.	Mrs. Savita Kesarwani	02237455	809, Valencia Tower, Mahagun Maple Apartment, Sector-50, Noida-201301	Lt. Jeet Lal Kesarwani
2.	Mr. Pankaj Kumar Jain	05217677	8024, Tower-8 ATS Advantage, 1 Ahinsa Khand, Indirapuram, Ghaziabad-201001	Mr. Pawan Kumar Jain
3.	Mr. Jawahar Lal Kesarwani	01408359	809, Valencia Tower, Mahagun Maple Apartment, Sector-50, Noida-201301	Lt. Moti Lal Kesarwani

of the Group, will take appropriate measures for effective implementation of the provisions of the said Act, constitute the ICC for providing free working environment and safeguard the women employees from any harassment, if any, occurred on the workplace(s) which are as follows:

1. KW Group, Block / Building No. B-97, Sector-63, Noida-201301, being used as Corporate office/Head office of the Companies/Group;
2. KW Delhi-6, situated at Main Road, NH-58 Bypass, Raj Nagar Extension, Ghaziabad, Uttar Pradesh 201017, Site office of KW HOMES PRIVATE LIMITED (for project “**KW DELHI 6**”);
3. Plot No. 2, DB Gupta Road, Near Faiz Chowk, Jhandewalan, Karol Bagh-1 10005, Site office of MADHAYM HOUSING PRIVATE LIMITED (for project “**KW Blue Pearl**”).

II. SCOPE:

This Policy applies to all categories of "employees" as defined under Section 2 (f) “The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013”. The Group Companies seeks to address all/any sort of sexual harassment in terms of the Law in the workplace falling within the scope of the said Act. The Promoters/senior management will not tolerate sexual harassment, if engaged with/ by clients or by suppliers or any other business associates.

The term "workplace" as defined under Section 2 (o) of The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and includes the followings:

1. All offices or other premises where the Company's business is conducted.
2. All Company-related activities performed at any other site which may be away from the Company's premises within the control of employers.
3. Any social, business or other functions and, or events, seminars including business gatherings where the conduct and, or commencements may have an adverse impact on working women employees taking part in the event.

III. DEFINITION OF SEXUAL HARASSMENT:

"Sexual Harassment as per Section 2 (n) of the Act includes any one or more of the following unwelcome acts or behavior (whether directly or by implication) namely:

1. Physical contact and advances; or
2. A demand or request for sexual favours; or
3. Making sexually coloured remarks; or
4. Showing pornography; or
5. Any other unwelcome physical, verbal or non-verbal conduct of sexual nature.

IV. RESPONSIBILITIES REGARDING SEXUAL HARASSMENT:

Prevention of sexual harassment—

- (1) No woman shall be subjected to sexual harassment at any workplace.
- (2) The following circumstances, among other circumstances, if it occurs, or is present in relation to or connected with any act or behavior 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) Interference 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

All employees of the Group/Company have a personal responsibility to ensure that their behavior is not contrary to this policy. All employees are encouraged to reinforce the maintenance of a work environment free from sexual harassment.

V. COMPLAINT MECHANISM:

An appropriate complaint mechanism in the form of "**Internal Complaints Committee**" (ICC) has been created in the Company/Group for time-bound Redressal of the complaint made by the victim employee.

CONSTITUTION OF INTERNAL COMPLAINTS COMMITTEE (ICC):

To prevent instances of sexual harassment and to receive and effectively deal with complaints pertaining to the same, an "**Internal Complaints Committee**" is constituted at each location. The detail of the committee is notified to all covered persons at the location (workplace).

The committee at each location comprises of:

- **Presiding officer:** A women at a senior level in the organization or workplace;
- **At least 2 members** from amongst employees, committed to the cause of women and or having legal knowledge;
- **One member** from amongst non-governmental organizations or associations committed to the cause of women or persons familiar with issues relating to sexual harassment.

The Internal Complaints Committee is responsible for:

- Receiving complaints of sexual harassment at the workplace.
- Initiating and conducting inquiry as per the established procedure in the Act.
- Submitting findings and recommendations of inquiries.
- Coordinating with the employer in implementing appropriate action.
- Maintaining strictly confidentiality throughout the process as per established procedure.
- Discouraging and preventing employment-related sexual harassment.

Current nominated members of the committee of each workplace are given in Annexure-A.

VII. PROCEDURES FOR RESOLUTION, SETTLEMENT OR PROSECUTION OF ACTS OF SEXUAL HARASSMENT:

The Company is committed to providing a supportive environment to resolve concerns of sexual harassment as under:

A. Informal Resolution Options:

When an incident of sexual harassment occurs, the victim of such conduct can communicate their disapproval and objections immediately to the harasser and request the harasser to behave decently. If the harassment does not stop or if victim is not comfortable with addressing the harasser directly, the victim can bring their concern to the attention of the Internal Complaints Committee (ICC) for redressal of their grievances. The Internal

Complaints Committee will thereafter provide advice or extend support as requested and will undertake prompt investigation to resolve the matter.

B. Complaints:

1. An employee with a harassment concern, who is not comfortable with the informal resolution options or has exhausted such options, may make a formal complaint to the Presiding Officer of the Internal Complaints Committee constituted by the Management. Any aggrieved women may make, in writing, a complaint of sexual harassment at workplace to ICC within a period of 3 (three) months from the date of incident and in case of series of incidents, within a period of 3 (three) months from the date of last incident and ICC, for the reasons to be recorded in writing, extend the time limit not exceeding three months, if it is satisfied with the circumstances of the case.
2. In case, where such complaint cannot be made in writing, the Presiding Officer or any member of ICC shall render all reasonable assistance to the woman for making the complaint in writing.
3. The ICC, may, before initiating an inquiry under Section 11 of the said Act and at the request of the aggrieved women, take steps to settle the matter between her and the respondent through conciliation, provided that no monetary settlement shall be made as a basis of conciliation and where the settlement has been arrived, shall record the settlement so arrived & forward the same to the employer to take action as specified in the recommendation. The ICC shall provide thereafter the copies of settlement as recorded to the aggrieved women and the respondent and no further inquiry shall be conducted.
4. Where the aggrieved women informs the ICC that any term or condition of the settlement arrived under Section 10 (2) has not been complied with by the respondent, the ICC shall proceed to make an inquiry into the complaint or, as the case may be, forward the complaint to the police and for the purpose of making an inquiry, the ICC shall have the same powers as are vested in a Civil Court under the Code of Civil Procedure, 1908 when trying a suit.
5. The inquiry under Section 11(1) shall be completed within a period of 90 days by ICC. Disciplinary action may include any of the followings:
 - a. Formal apology;
 - b. Reduction to lower grade;
 - c. Written warning and a copy of it maintained in the employee's file;
 - d. Reassignment of duties including debarring from supervisory duties;

- e. Suspension or termination of services of the employee found guilty of the offence;
- f. Stoppage of promotion for two years or more depending upon the sensitivity of case;
- g. Any other appropriate disciplinary action as deemed fit by the management.

C. Inquiry Report:

On completion of the inquiry the ICC shall submit the inquiry report to the concerned parties within 10 days from the date of completion of inquiry.

D. Punishment For False Or Malicious Complaint And False Evidence:

Where the ICC, arrives at the conclusion that the allegation against the respondent has made the complaint knowing it to be false or has produced any forged or misleading document, it may recommend to the employer, to take action against the aggrieved women or the person who has made the complaint with wrongful intention, as the case may be, in accordance with the provisions of the services rules applicable to her or him or where no such service rules exist, in such a manner as may be prescribed under the said Act.

VIII. COMMITTEE TO SUBMIT ANNUAL REPORT FOR EVERY YEAR TO THE DISTRICT OFFICER:

The ICC shall submit the annual report of each calendar year to the employer and the employer is required to include in its report the no. of cases filed and their disposal and file an annual report to the concerned District officer designated/appointed for the district wherein the work place is operating, in such form and in such prescribed manner

Preparation of annual report:

It shall contain the following details:

- a) No. of complaints of sexual harassment in a year;
- b) No. of complaints disposed off in a year;
- c) No. of cases pending for more than 90 days;
- d) No. of workshops for awareness against sexual harassment;
- e) Nature of action taken by employer or district magistrate.

IX. 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.

X. PROTECTION TO COMPLAINANT / VICTIM:

The Company is committed to ensuring that no employee who brings forward a harassment concern is subject to any form of reprisal. Any reprisal will be subject to disciplinary action.

The Company will ensure that the victim or witnesses are not victimized or discriminated while dealing with complaints of sexual harassment. However, anyone who abuses the procedure (for example, by maliciously putting an allegation knowing it to be untrue) will be subject to disciplinary action as provided under the Act.

XI. CONCLUSION:

In conclusion, the Company reiterates its commitment to providing its employees, a workplace free from harassment/ discrimination and where every employee is treated with dignity and respect.

Annexure-A

Internal Complaint Committee, Site Office: KW Delhi 6, Ghaziabad:

S. No.	Member Name	Designation	Contact No.
1.	Mrs. Chavvi Aggarwal	Presiding officer	8377004275
2.	Mr. Prashant Kumar Singh	Member	8588897346
3.	Mr. Abhishek Jha	Member	7290073776
4.	Mrs. Bhawna Saini	External Member	9310730183

*Each location/unit of aforesaid Group Companies has a duly constituted ICC, details of which will be placed on the website of the Company/ Group Companies.