

Policy on Prevention of Sexual Harassment (POSH) of Women at Workplace

#	Version	Reference No.	Published/ Uploaded on	Sub Process	Process Owner
1	1.0	HRD / Version – 1 / Oct 2012	October 2012	HR – Employee Benefits	HR
2	2.0	HRD / Version – 2 / Dec 2013	December 2013	HR – Employee Benefits	HR
3	3.0	HRD / Version – 3 / Nov 2014	November 2014	HR – Employee Benefits	HR
4	4.0	HRD / Version – 4 / Nov 2014	February 2015	HR – Employee Benefits	HR
5	5.0	HRD / Version – 5 / July 2015	July 2015	HR – Employee Benefits	HR
6	6.0	HRD / Version – 6 / Sep 2019	September 2019	HR – Employee Benefits	HR
7	7.0	HRD / Version – 7 / Dec 2020	December 2020	HR – Employee Benefits	HR
8	8.0	HRD / Version – 8 / Jan 2022	January 2022	HR – Employee Benefits	HR

1. POLICY STATEMENT & PURPOSE

1.1. It is the purpose of Sterling Holidays (hereafter referred to as “Company”) to provide a workplace free of all forms of discrimination, including sexual harassment and harassment on the basis of race, color, religion, nationality, sex, age, disability and any other category protected by Central, State and local laws, codes, regulations and ordinances. All such harassment is illegal and strictly prohibited by the Company.

This 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”). It is meant to deter acts of sexual harassment of women employees.

1.2. The purpose of this policy statement is to:

- state the Company’s firm commitment in maintaining a workplace for women free of harassment and retaliation;
- provide procedures for the reporting and investigation of sexual and other prohibited harassment claims for women; and
- ensure that violations are remedied without retaliation against any person for reporting harassment or participating in a harassment investigation.

2. SCOPE

- The policy shall apply to all the women employees (both On-roll and Outsourced) whether directly or indirectly employed by the Company. This applies equally to relations between superior and subordinates as well as between peers
- This updated Policy would be in force till further notice and will supersede the earlier versions of the policy

3. DEFINITIONS

- (a) ‘*Sexual Harassment*’ includes any one or more of the following unwelcome acts or behavior (whether directly or by implication) (“Incident”) 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
- (b) ‘*Employee*’ means a person employed by Company for any work on regular, temporary, ad hoc or daily wage basis, either directly or through its agent, including 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 a co-worker, a contract worker, probationer, trainee, apprentice or called by any other such name.
- (c) ‘*Workplace*’ means any department, undertaking, establishment, resort, office branch or unit which is established, owned, controlled partially or wholly by the Company for carrying on professional, commercial, industrial activities including production, sale,

distribution and supply. It includes any place visited by the employee arising out of or during the course of employment including transportation provided for undertaking such journey.

- (d) '*Complainant*' means the aggrieved employee/person
- (e) '*Respondent*' means a person against whom the Complainant has raised a complaint
- (f) '*Parties*' means both the Complainant and the Respondent

4. COMPLAINTS COMMITTEE FOR SEXUAL HARASSMENT (CASH)

The company has established a Complaints Committee for Sexual Harassment. The names of the members of this Committee and their contact details are given below in **Annexure I**

The Committee will seek the advice of any NGO or third party who it feels will be able to provide special assistance to the Committee in dealing with such issues.

(a) Minimum of 3 members are the required for quorum for a redressal hearing.

(b) The following individual would serve as external consultant Ms.Susanna Prabhu, Offices of Susanna Prabhu-susanna.prabhu@gmail.com

5. ROLES AND RESPONSIBILITIES OF COMMITTEE MEMBERS

- Investigating every formal written complaint
- Taking all appropriate remedial measures to respond to allegations
- Discourage and prevent employment related sexual harassment
- Encourage conciliation proceedings
- Enquiry in accordance with the 'principles of natural justice'

6. REDRESSAL PROCEDURE

6.1. Any employee who experiences sexual harassment can get in touch with any member of the Complaints Committee (ICC/LCC) for Sexual Harassment whose contact details are provided in Annexure I & II for convenient and confidential access. Alternatively, the complaint can be raised by a colleague and verified by the complainant in writing. All such complaints shall be in writing with full details of the incident.

6.2. On receipt of such a complaint, the Committee 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 employee or employees, who have allegedly committed the offence, would be given all reasonable opportunity to be heard by the Committee in accordance with the “principles of natural justice”

6.3. The result of this investigation will be formally recorded and communicated to the Chairman & Managing Director, SHRL, along with a recommendation for an appropriate action

6.4. The Committee will normally complete this process and make its formal recommendation within 30 days after receiving the complaint, unless there are exceptional circumstances.

6.5. In the case of a multi locational context, one of the committee members will travel to the location in question as is required to ascertain the facts based on which the committee would discuss and assess the complaint in question

6.6. Necessary action will then be taken with regard to the respondent based on the circumstances and seriousness of the offence

6.7. Where the Company is legally advised that any such incident constitutes criminal offence, the Company will inform the relevant authority, provide full details and request appropriate action. If the aggrieved employee directly takes any action, against the offending employee, either civil or criminal, the Committee, on becoming aware of such action by the aggrieved employee, shall be entitled to, suo moto, start the internal enquiry / investigation and recommend appropriate action.

6.8. The Company will ensure that the career interests of the complainant are not adversely affected by virtue of the individual having drawn attention to such an offence

6.9. In order to ensure that this important matter is not trivialized, any complaint, which, in the opinion of the Committee, is blatantly false or frivolous or has been motivated by reasons that are clearly unconnected with gender issues, would be viewed very seriously by the company and appropriate action taken against such complainants

6.10. Heads of departments and senior executives at all company locations will also be expected to be sensitive to any circumstances or behavior among their colleagues which appear to go against the company policy on this matter. In case they become aware of any such incidence, they will immediately inform the Committee and take appropriate action as advised.

For details on the redressal process, please refer **Annexure II**

7. RECORDS AND CONFIDENTIALITY

All enquiry reports shall be filed before the CHRO and records shall be maintained. An annual report shall be filed before the CMD or CFO by April of every year.

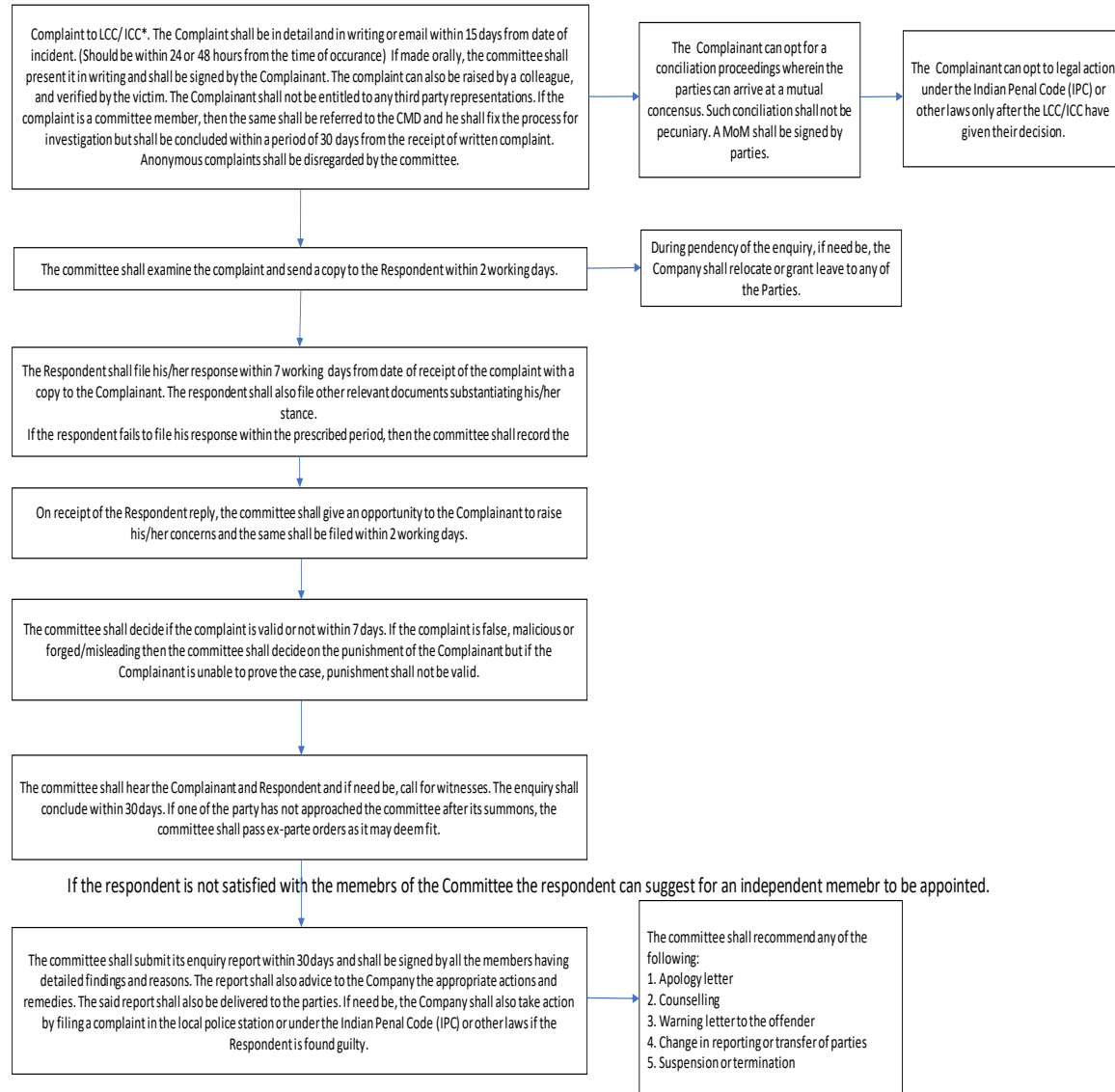
The identity of the Complainant, Respondent, witnesses, statements and other evidence obtained in the course of inquiry process, recommendations of the committees, action taken by the employer is considered as confidential materials, and not published or made known to public or media.

Any person contravening the confidentiality clauses is subject to disciplinary action as prescribed by the Company or in the Act or other laws.

Annexure I – COMPLAINTS COMMITTEE FOR SEXUAL HARASSMENT (CASH)

Committee	Details of the Committee	Role
ICC (Corporate & South)	Rutayani Mishra, VP – HR	Presiding Officer
	Gunasekar S, VP – Finance	Member
	Chitra K, AVP – Customer Assurance	Member
	Surej Hassan, VP – Customer Engagement	Member
	Nandini B, Manager – Call Centre	Member
East	Aarthi Chandramohan, AVP HR	Presiding Officer
	Raju Arumugam, Regional Head - HR	Member
	Mohnish Chandwaskar, RVP – Resort Ops	Member
	Vaishnavi Prasad, Snr Mgr. – Corp Marketing	Member
	Chandra Vidya S, Asst. Mgr. – Call Centre	Member
North	Rajeswari Vachali, VP HR	Presiding Officer
	Nidhi Singh, Mgr. HR	Member
	Meenakshi Saxena, Mgr. Customer Assurance	Member
	Craig Ireland, Head - HSD	Member
	Vipin Singhal, RVP – Resort Ops	Member
West	Neelam Saxena, AVP – Customer Assurance	Presiding Officer
	Mrunalini Gerry Willis, AVP - HSD	Member
	Suprabhat Banerjee, Regional Head - HR	Member
	Samrat Rasal, Senior Manager – Legal	Member
	Nameeta Shete, Asst. Manager - HR	Member

Annexure II – Redressal Process



* As the case maybe