

Doc Ref.: HR /Policy 2021 /012	POLICY ON PREVENTION OF SEXUAL HARASSMENT AT WORKPLACE	CASAGRANT building aspirations
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1. Objective:

- 1.1 Casagrand Premier Builder Limited (“Casagrand”) is committed to providing a safe environment for all its associates, irrespective of gender, free from discrimination on any ground and from harassment at work including sexual harassment.
- 1.2 Casagrand will operate a ‘zero-tolerance’ policy for any form of sexual harassment in the workplace, treat all incidents seriously and promptly investigate all allegations of sexual harassment.
- 1.3 Any person found to have sexually harassing another will face disciplinary action, upon and including dismissal from employment.
- 1.4 All complaints of harassment, including sexual harassment will be taken seriously and treated with respect and in confidence. No associates will be victimized for making such a complaint.
- 1.5 This policy is framed to meet the requirements of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 as well as to prevent inappropriate workplace behavior of any nature or sexual harassment.

2. Whom:

- 2.1 This policy applies to all categories of employees of Casagrand and its group, including permanent, temporaries, trainees, part time, honorary, consultant, and would include employees employed on a casual or project basis and also employees on contract at their workplace or at a client’s site. Casagrand will not tolerate sexual harassment, if engaged by clients or customers or by suppliers and vendors, or any other business associates.
- 2.2 The workplace includes:
 - a. All offices, units or other premises where Casagrand’s business is conducted.
 - b. All Casagrand related activities performed at any other site away from the company’s premises or other places wherever the employees are deployed.
 - c. Any social, business or other functions where the conduct or comments may have an adverse impact on the workplace or workplace relations.

3. What constitutes Sexual Harassment?

a. Definition:

Sexual harassments, an unwelcome conduct of sexual nature which makes a person feel offended, humiliated and / or intimidated. It includes situations where person is asked to engage in sexual activity as a condition of that person’s employment, as well as situations which create an environment which is hostile, intimidating or humiliating for the recipient.

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Sexual harassment can involve one or more incidents and actions constituting harassment which may be physical, verbal, non-verbal and written. Examples of conduct or behavior which constitutes sexual harassment include, but are not limited to:

- i. Unwelcome physical contact including patting, pinching, stroking, kissing, hugging, fondling, or inappropriate touching.
 - ii. Unwelcome sexual advances which could be verbal, written or physical.
 - iii. Demand or request for sexual favours.
 - iv. Any type of sexually oriented conduct, or sexually coloured remarks.
 - v. Physical violence, including sexual assault.
 - vi. Verbal abuse or 'joking' that is sexually oriented.
 - vii. Use of job-related threats or rewards to solicit sexual favours.
 - viii. Showing or sending pornographic materials (by phone or email).
 - ix. Comments on appearance, age, private life, etc. of an associate.
 - x. Repeated and unwanted social invitations for 'dates' or 'physical intimacy'
 - xi. Insults based on sex or gender of an associate.
 - xii. Condescending or paternalistic remarks.
 - xiii. Display of sexually explicit or suggestive material.
 - xiv. Sexually suggestive gestures.
 - xv. Whistling and (or) leering against an associate.
- b. Following circumstances if it occurs or is present in relation to a sexual behavior:**
- i. Implied or promised treatment of preferential treatment.
 - ii. Implied or explicit threat of detrimental treatment in employment.
 - iii. Implied or explicit threat of present or future employment of the person.
 - iv. Interference with work or creating hostile or unfriendly work environment.
 - v. Humiliating treatment affecting health or safety.
- c. Sexual conduct by the following is strictly prohibited:**
- i. Manager
 - ii. Supervisor or peer or any other third party
 - iii. Any other associate within the organization or related in terms of business.

4. Complaint and redressal mechanism:

- i. Casagrand has instituted a "Prevention of Sexual Harassment Committee" (the Internal Compliance Committee hereinafter referred to as "Committee") for redressal of sexual harassment complaints (made by a victim) and for ensuring time bound treatment of such complaints. Initially, and till further notice, the Committee will comprise of the following members out of which 60% of the member will be women and of the same gender as that of the complainant.
 - a. Sindhu S – Presiding Officer
 - b. Vijayalakshmi A - Member
 - c. Siva Sankar Reddy – Member

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- d. Raghavi Raj – External Member
 - e. Sheena P – Member (Bangalore Zone)
 - f. Rajarajeswari – Member (Coimbatore Zone)
- ii. The Committee is responsible for:
- a. Investigating every formal written complaint of sexual harassment.
 - b. Taking appropriate remedial measures to respond to any substantiated allegations of sexual harassment.
 - c. Preventing employment related sexual harassment.
 - d. Provide awareness on prevention, prohibition and redressal of sexual harassment in workplace.

5. Redressal Process:

- I. It is the obligation of all associates to report sexual harassment experienced by them personally. A concerned colleague or co-worker may also report to the Committee of any instance or behavior of sexual harassment by an associate.
- II. Such complaint may be oral or in writing.
- III. Who can file a complaint:
 - a. Any aggrieved women or victim.
 - b. On behalf of the victim, any relative, friend, co-worker, officer, any national or State Women Commission – in case of physical incapacity of the victim.
 - c. On behalf of the victim, any relative, friend, special educator, psychiatrist or psychologist, a guardian or authority under whom the case of the aggrieved women or victim is receiving treatment.
 - d. A legal heir – in case of death of the victim.
- IV. The complainant will be afforded full confidentiality.
- V. Where sexual harassment occurs as a result of an act or omission by any third party or outsider, the Committee will take all steps necessary and reasonable to assist the affected employee in terms of support and preventive action.

6. Conciliation process:

- I. The Committee in its powers may, before initiating investigation, do settlement of the matter between the complainant and the respondent, but cannot do any settlement monetarily.
- II. The Committee shall record the settlement and forward it to the leadership team of the organization for further action.
- III. In case of such a settlement, there shall be no further enquiry on the matter.

7. Inquiry into complaint:

- I. The Committee shall maintain basic principles of natural justice while conducting the process of inquiry.

- II. The Committee should send a copy of the complaint or notify the respondent of such a complaint within 7 days from the date of the receipt of the complaint.
- III. The respondent should reply to such a complaint within 10 days.
- IV. During investigation, both the parties should be present, and in case of the request for anonymity from the complainant, the process of inquiry will be with the respondent. A third party will not be present during inquiry.
- V. The Committee shall have powers of recovery, discovery and production of any document related to the investigation; and enforce attendance of any person for the purpose of investigation.
- VI. The Committee shall have powers to enforce any other matter which may be prescribed under law.
- VII. **Ex- parte decision:** The Committee has the right to terminate inquiry if either the complainant or the respondent failed to be present for three consecutive hearings. However, such a termination shall be by giving 15 days' notice to the parties involved.
- VIII. The process of investigation should be completed within 90 days from the date of complaint.

8. Interim Relief:

- I. The organization at the behest of the committee shall depute the complainant to another location/ department, grant leave for the period of 3 months over or above the leave in her account or grant such other relief as may be deemed fit and / or restrict respondent to supervise her work or writing her appraisal.

9. Report of Findings:

- I. The committee shall within 10 days from the date of completion of the inquiry report the findings to the leadership team of Casagrand.
- II. On proof of findings, depending upon the case, the organization may take action which may be:
 - a. Payment of compensation
 - b. Written warning
 - c. Transfer or reassignment
 - d. Suspension or termination
 - e. Initiate training or professional counseling or any other process within 60 days.
 - f. Any other punishment according to the service rules applicable to the respondent

10. Appeals:

- I. Any aggrieved party shall, by recommendation, appeal against the findings as per law, within 90 days.

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11. Residuals:

Casagranda may change, delete, modify any content of this policy without notice, and all associates shall be bound by such a change as and when effected. Any subsequent amendment/modification in applicable law in this regard shall automatically apply to this policy.

12. Disclosure under Schedule V of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Listing Regulations"):

Under the Listing Obligations and Disclosure Requirements, the company shall in its Annual Report put the disclosures in relation to the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 in the following manner-

- a. Number of complaints filed during the financial year
- b. Number of complaints disposed of during the financial year
- c. Number of complaints pending as on end of the financial year.

13. Dissemination of the Policy:

A copy of this policy shall be if necessary circulated or given to all associates of Casagranda and all new recruits and they shall on insistence of the HR department sign a statement acknowledging that they have read and understood and will abide by this policy.

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