



Policy Title	Prevention of Sexual Harassment (POSH) Policy
Version	POSH_1 (Post – Demerger)
Effective Date	28 th July 2025
Next Review Date	28 th July 2027
Policy Owner	Human Resources
Policy Administrator	External Legal Partner – SASHA; Internal Team – Legal, Compliance, Company Secretarial and APEX Committee
Policy Approver	Piramal Finance Limited - Board

Review History

Version No.	Review Date	Reviewer	Approver	Reviewer Remarks

Contents

Scope of Policy..... 3

Objectives 4

Definitions and examples of sexual harassment..... 5

Responsibilities regarding sexual harassment 7

Third party harassment..... 8

Procedures for resolution, settlement, or prosecution of acts of sexual harassment 8

 Written complaint..... 8

 Initial IC meeting 10

 Statement of allegations to Respondent 10

 Written response from Respondent 10

 IC jurisdiction 10

 Conciliation 10

 Inquiry 11

 Quorum 12

 Attendance at an inquiry hearing 12

 Summoning Witnesses..... 12

 Complaint Withdrawal 12

 Completion of Inquiry Report 12

Penalties: 13

Assistance during criminal proceedings 13

Interim Relief..... 14

Confidentiality 14

Access to reports and documents..... 15

False or Malicious Complaint..... 15

Compensation..... 15

Protection of Complainant and Witnesses from retaliation..... 15

Reporting by the IC..... 16

Modification and review of the policy..... 16

IC members..... 16

Timelines under the act: 17

Annexure 1..... 17

Scope of Policy

This policy is applicable to the following business units/entities:

Business Unit	Applicable
Partner Functions, Group Corporate, Piralma Corporate Services Private Limited (PCSPL), Piralma Trusteeship Services Private Limited (PTSPL), Piralma Corporate Tower Private Limited (PCTPL), Piralma Agastya Offices Private Limited (PAOPL), Piralma Art Foundation	Yes
Wholesale	Yes
Retail	Yes
Corporate Mid-Market Lending	Yes
Piralma Alternatives	Yes
India Resurgence Fund	No

Objectives

1. We are committed to providing all our employees an environment free of gender-based discrimination and harassment. In furtherance of this commitment, the Company strives to provide all its employees with equal opportunity conditions of employment, free from genderbased coercion, intimidation, or exploitation and to create a work environment where everyone has an opportunity to fully participate in achieving business success and is valued for the distinctive skills, experiences, and perspectives an employee brings to the workplace. The Company has zero tolerance for harassment, intimidation, or humiliation of a sexual or genderbased nature in its workplace and is dedicated to ensuring enactment, observance, and adherence to guidelines and best practices that prevent and prosecute acts of sexual harassment.
2. The Company believes that all individuals have the right to be treated with dignity. Sexual harassment as well as discrimination or intimidation of a sexual or gender-based nature by or towards any employee in the workplace will not be condoned. The Company will not tolerate retaliation in any form against personnel for raising sexual harassment complaints or concerns.
3. This Policy applies to all allegations of sexual harassment made by a Complainant against another employee irrespective of whether sexual harassment is alleged to have taken place within the Company premises or in any other place visited by such employee for or in relation to work. All actions prohibited by an employee of the Company by this Policy are also prohibited for all individuals who are on the Company premises or on any other property where the Company conducts its business. As such this Policy shall apart from employees be also applicable to all third parties such as visitors, clients, customers, contractors, service providers, and any other person authorized to be present within the premises/ workplace of the Company.
4. The Company believes that all individuals have the right to be treated with dignity. Sexual harassment as well as discrimination or intimidation of a sexual or gender-based nature by or towards any employee in the workplace will not be condoned. The Company will not tolerate retaliation in any form against personnel for raising sexual harassment complaints or concerns.
5. This Policy applies to all categories of employees of the Company, including permanent employees, permanent management, workmen, temporary employees, trainees, consultants, advisers, ad hoc employees, daily wage earners, probationers, apprentices, employees on contract, etc., at its workplace or visits to partner organizations. The Policy is applicable to all categories of employees as stated above, irrespective of whether such people have been engaged directly or through an agency or a contractor, and whether such employees are working for remuneration or on a voluntary basis.
6. If an individual commits an act in violation of this Policy, whether an employee of the Company or a third party interacting with the Company, the Company will take appropriate remedial measures under the circumstances, including measures to mitigate the potential for repetition, and to discipline any of its employees who may have participated in such conduct, or may have failed to stop such conduct when they had actual knowledge of such conduct and the authority to do so.

7. This is a gender-agnostic company policy and is applicable to all categories of employees, whether permanent or on contract, and at their workplace or client sites. All complaints will be dealt with in a just and fair manner and may have serious consequences. The company will not tolerate any form of sexual harassment engaged in by clients, employees, suppliers, or any other business associates and is committed to taking all necessary steps to ensure the safety and well-being of all employees and associates.
8. **Exclusion:** It is to be noted that this Policy does not apply when the Complainant is performing work outside of the Workplace, of their own accord and for personal reasons, and without the authorization of the Organization.

Definitions and examples of sexual harassment

1. **“Complainant”** means, in relation to a Workplace (as hereinafter defined), an aggrieved person, of any age whether employed or not, who alleges to have been subjected to any act of sexual harassment by the Respondent (as hereinafter defined)
2. **“Employees”** means all employees of the Company and includes all categories of employees of the Company either working part-time or full-time and including but not limited to:
 - a. Permanent employees;
 - b. Temporary employees;
 - c. Trainees;
 - d. Contract employees;
 - e. Consultants; and
 - f. Advisers.
3. **“Employer”** means and includes –
 - a. Director of the Company; and
 - b. any person(s) or board or committee responsible for the formulation and administration of policies that enable management, supervision, and control of the Workplace.
4. **“Internal Committee” (hereinafter referred to as the “IC”)** means the committee constituted by the Company further to the Act and Rules to redress complaints of sexual harassment at the workplace. The IC is the sole inquiring authority into all complaints of sexual harassment at the workplace and a recommendatory body for disciplinary actions thereof based on the findings of the inquiries.
5. **“Member/s”** means a member/s of the IC;
6. **“Respondent”** means a person (Employee) against whom the Complainant has made a complaint of Sexual Harassment.
7. **“Sexual Harassment”** includes any one or more of the following unwelcome acts or behavior (whether directly or by implication) namely:
 - a. Physical contact and advances; or
 - b. A demand or request for sexual favors; or
 - c. Making sexually colored remarks; or
 - d. Showing pornography; or
 - e. Any other unwelcome physical, verbal, or non-verbal conduct of sexual nature

8. 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 at the workplace:
 - a. Implied or explicit promise of preferential treatment in the Complainant's employment; or
 - b. Implied or explicit threat of detrimental treatment in the Complainant's employment; or
 - c. Implied or explicitly threaten the Complainant's present or future employment status; or
 - d. Interference with the Complainant's work or creating an intimidating or offensive or hostile work environment for the Complainant; or
 - e. Humiliating treatment is likely to affect the Complainant's health or safety.
 - f. Examples of instances construed as sexual harassment are provided at Annexure 1.

9. **"Witness"** means any individual or individuals who have been called upon by either the Complainant, Respondent, or the IC to record their statements as a part of the inquiry proceedings.

10. **"Workplace"** means and includes the offices of the Company as well as the premises of other third parties, vendors, and associates of the Company where the Employees of the Company are required to perform work or that are visited by the Employees of the Company arising out of or during the course of employment and includes transportation provided by the Company for undertaking any journey, in connection with the business of the Company. Thus, workplace shall include:
 - a. All offices or other premises where the company's business is conducted;
 - b. Any other site away from the company's premises where company-related activities are performed (For example: off -sites or company-organized social events, training sessions conducted);
 - c. Any social, business, or other events related to the company's work where any conduct or comment may have an adverse impact on the workplace or workplace relations;
 - d. Transportation provided by the company to undertake a professional journey;
 - e. All work-from-home and virtual communications inclusive of telecommunications and online virtual meetings, emails, or communications that are conducted or shared via any virtual platforms;
 - f. This definition will also include the hybrid model of workforce in organizations where this policy will still be applicable to the part of the employees working from remote locations, or even from home and if there are any complaints from either an employee working from home to an employee in office or vice versa, the IC proceedings will accordingly be conducted online as well upon the discretion of the IC itself.

Responsibilities regarding sexual harassment

All employees of the 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.

1. Employees' Responsibilities
 - a. Treat others with respect and dignity.
 - b. Read and understand the Policy document;
 - c. Take reasonable care not to offend co-workers and associates through one's actions or behavior;
 - d. Take responsibility to discourage unwelcome conduct that is offensive, degrading, or humiliating;
 - e. Apologize if someone tells them they are off ended by their words or actions;
 - f. Be informed about who is on the IC;
 - g. Cooperate in the inquiry of complaints when called to do so;
 - h. Maintain confidentiality at all times in the event that you are involved in or have access to information related to any complaint that is raised;
 - i. Maintain and take up any other activity or responsibility that contributes towards making the work environment safe and respectable for all employees
2. Management and Team Manager's responsibilities
 - a. Create and maintain a working environment in which all employees feel safe and respected;
 - b. Be alert to observe any inappropriate conduct or comments passed;
 - c. Report to the IC in accordance with this policy, when instances of sexual harassment that occur within the workplace are brought to their attention;
 - d. Discuss and display the consequences of sexual harassment at a conspicuous place of the workplace;
 - e. Assist in securing the attendance of the respondent;
 - f. Make any such information available to the IC;
 - g. Provide assistance to the employees if they wish to file a complaint under the Indian Penal Code;
 - h. The Company may take appropriate actions in accordance with law by filing complaints with the right authorities where any conduct that amounts to a specific offense under the Indian Penal Code or any other such penal law that is in force at the time.
 - i. In the event that any visitor(s) engages in sexual harassment or if the company receives complaints from their employees or consultants, the company will assist in filing complaints with the appropriate authorities under the applicable laws enforced and the company shall also assist such employees or consultants in distress.

- j. The company encourages individuals facing sexual harassment to promptly notify the offender that such an act is unwelcomed, and it creates a hostile work environment for themselves and others as well. It is also recognized that the disparity of power between the offender and the victim can be a hindrance in notifying such offender and might make it sometimes impossible to do so. In such an event, the individual may directly contact the members of the IC or IC using the contact information on the notice board to notify such behavior.
 - k. Sexual harassment will be treated as a major misconduct that is dishonorable, detrimental, and discreditable to the reputation of the company which can lead to very severe consequences and actions that also include the dismissal from service.
3. IC responsibilities
- The IC is responsible for conducting an inquiry into every formal written complaint of sexual harassment and making recommendations to the Company on the actions to be taken against the responsible person. The IC will also be responsible for the preparation and submission of the Annual Report prepared by the IC for each calendar year to be submitted to the District Officer and employer and maintain a record of such annual reports.

Third party harassment

1. Third-party harassment means Sexual Harassment perpetrated by visitors, patrons, vendors, independent contractors, auditors, consultants, and others with whom the Employees have come in contact, directly or indirectly, because of the organization having a relationship/business relationship with them.
2. Where Sexual Harassment at the Workplace occurs as a result of an act or omission by any third party, the organization shall take all steps necessary and reasonable to assist the affected employee in terms of support and preventive action.

Procedures for resolution, settlement, or prosecution of acts of sexual harassment

The Company is committed to providing a supportive environment in which the concerns of sexual harassment shall be resolved as follows:

Written complaint

When an incident of sexual harassment occurs, a Complainant may make a written complaint to the Presiding Officer or any member of the IC. The Complainant can file a physical copy of the complaint through a sealed envelope or send it through an email to their IC members or email at posh@piramal.com.

The complaint should be in writing and clearly include:

1. The identity, and designation of the Complainant and the identity of the Respondent against whom the complaint is being lodged;
2. The dates, time, and location of the incident or incidents, since these are useful for speedy redressal;

3. The identities, designation, and contact information of any other employee who may have witnessed the incident (if any);
4. Other relevant documented evidence (if available)

The complaint should be made, preferably no later than three months from the date of the incident. If the incidents are continuous or have occurred more than once, then the complaint should be made within three months since the most recent incident. The period of three months for filing the written complaint may be extended by the IC at its sole discretion for an additional period of three months, if it is satisfied that the circumstances were such which prevented the Complainant from filing of the complaint within the initial period of three months. The reasons for an extension will be recorded in writing by the IC in its final report.

The Presiding Officer or any Member of IC may also render reasonable assistance to the Complainant for making any complaint in writing if the complainant cannot make the complaint in writing themselves.

In the event the Complainant is unable to make the complaint on account of the Complainant's physical incapacity, the complaint may be filed by:

1. The Complainant's relative or friend;
2. The Complainant's co-worker;
3. An officer of the National Commission for Women or State Women's Commission (in case the Complainant is a woman); or
4. Any person who has knowledge of the incident, with the written consent of the Complainant.

In the event the Complainant is unable to make the complaint on account of the Complainant's mental incapacity, the complaint may be filed by:

1. The Complainant's relative or friend;
2. A special educator;
3. A qualified psychiatrist or psychologist;
4. The guardian or authority under whose care the Complainant is receiving treatment or care; or
5. Any person who has knowledge of the incident jointly with the Complainant's relative or friend, or a special educator or qualified psychiatrist or psychologist, or guardian or authority under whose care the Complainant is receiving treatment or care.

In the event the Complainant is unable to make the complaint for any other reason, the complaint may be filed by any person who has knowledge of the incident, with the Complainant's written consent.

In the event of the death of the Complainant, the complaint may be filed by any person who has knowledge of the incident, with the written consent of the Complainant's legal heir.

In the event the respondent is not an employee of the Company, IC will take appropriate action to safeguard the Complainant while file the complaint against the Respondent with the appropriate authority.

Initial IC meeting

The IC will hold a meeting with the Complainant, as soon as practicable, but no later than within 7 days from date of receipt of the complaint. At this meeting, the IC shall hear the Complainant, record the allegations, and encourage the Complainant to submit any corroborative material with documentary proof, oral or written material, etc. to substantiate the complaint if available.

Statement of allegations to Respondent

Within seven working days from the date of the complaint, the IC shall forward a copy of the complaint or a statement of allegations to the Respondent and give the Respondent an opportunity to submit a written explanation.

Written response from Respondent

The Respondent will receive a copy of the complaint within seven working days of the complaint being lodged with the IC. The Respondent will have an opportunity to submit a written response, along with a list of witnesses, dates, and events, if any, to the IC or make an oral representation in response to the contents of the complaint within ten working days of receipt of the complaint.

IC jurisdiction

In the event the IC concludes that prima facie the allegations in the complaint do not fall within the purview of sexual harassment, the IC will forward the complaint to the HR Department or any appropriate Committee within the Company having jurisdiction to inquire into the complaint to investigate into the complaint in accordance with applicable Company policies and procedures.

Once the complaint has been filed, the following courses of action may be taken:

Conciliation

1. The Complainant can request conciliation before the commencement of an inquiry by the IC. Such conciliation can only be requested by the Complainant.
2. The IC shall then record the settlement so arrived and forward the same to the Employer to take action as specified in the recommendation.
3. The IC shall provide copies of the settlement to the Complainant and the Respondent.
4. Where a settlement has arrived under conciliation, no further inquiry shall be conducted by the IC.
5. The possible corrective action in Conciliation includes a verbal/written warning, counselling, or a gender workshop. Under the conciliation process, compensation cannot be granted to the Complainant. The IC will maintain documentation of complaints that have been addressed through conciliation.
6. The documentation handled by the IC pertaining to the proceedings through inquiry or conciliation, will be handled with the utmost confidentiality. The Complainant, the

Respondent, and any other person involved in these proceedings will also be subjected to maintain confidentiality regarding the proceedings.

Inquiry

1. If the Complainant is not comfortable with Conciliation or where the Conciliation fails or the terms of conciliation are not adhered to, IC shall proceed to make an inquiry into the complaint.
2. IC shall follow the principles of natural justice during the proceedings.
3. Legal representation: Neither the Complainant nor the Respondent will have the right to be represented by legal counsel at any stage of inquiry by the IC.
4. For making an inquiry, the IC shall have the same powers as are vested in a civil court under the Code of Civil Procedure, 1908 when trying a suit in respect of the following matters, namely:
 - a. summoning and enforcing the attendance of any person and examining him on oath.
 - b. requiring the discovery and production of documents; and
 - c. any other matter as may be prescribed.
5. While the inquiry/conciliation proceedings shall ordinarily be conducted face-to-face with the parties and witnesses physically appearing for meetings at the office premises or any other location specified by the IC, in certain circumstances, the IC may allow the parties or witnesses to appear before it through videoconference or telephonic means. In such situations, the following guidelines shall also be observed:
 - a. Videoconference or telephonic proceedings shall be conducted only with the consent of the parties and witnesses involved.
 - b. The parties or witnesses who are required to depose before the IC shall be given adequate notice of 24 hours to ensure that they have enough time to set up the infrastructure required for taking a video conference call.
 - c. The IC members/ parties/ witnesses to any inquiry or conciliation will be bound by the same standards of confidentiality as in the case of face-to-face proceedings. Audio or video recording of proceedings shall not be permitted. The IC member/ party/ witness appearing through virtual means must ensure that they are alone in the room when taking the call and that no part of the information relating to the proceedings is made known to any unauthorized individual.
 - d. Parties/ witnesses will be sent a copy of the minutes of meetings or other relevant documentation (such as inquiry/ findings reports, evidence, etc.) via email.
 - e. All communication (including but not limited to consent, confirmations, questions, comments, responses, and statements) shall be made through email and/ or digital signatures.
 - f. If videoconference or telephonic proceedings are not feasible, the IC may postpone the same until physical meetings can be conducted.

Quorum

The quorum for the inquiry proceedings shall be a minimum of three members of the IC including the Presiding Officer and External Member.

Attendance at an inquiry hearing

The IC will provide a reasonable opportunity to be heard to both the Complainant and the Respondent.

Both the Respondent and the Complainant (unless specifically exempted by the IC in writing) shall be required to attend every hearing that they have been called for. If either party fails to attend three consecutive hearings without sufficient cause, the IC may terminate the inquiry or pass an ex-parte order with fifteen days' notice to the concerned party.

Summoning Witnesses

While conducting the inquiry, the IC may call upon such Witnesses as it may deem appropriate. The Complainant and the Respondent will have the right to submit a list of Witnesses.

Complaint Withdrawal

A withdrawal of the complaint made or filed at any stage of proceedings shall not preclude the IC from proceeding with the investigation of the complaint.

Completion of Inquiry Report

1. The IC shall provide a report of the findings to the Employer and both parties within a period of ten days from the date of completion of the inquiry.
2. The Employer shall act upon the recommendation within sixty days of receipt of the Inquiry Report.
3. If the IC arrives at the conclusion that the allegation against the Respondent has not been proved, it shall recommend to the Employer that no action is required to be taken.
4. If the IC arrives at the conclusion that the allegation against the Respondent has been proved, it shall be recommended to the Employer to:
 - a. Take action for Sexual Harassment as a misconduct in accordance with the provisions of this policy; and/or
 - b. Deduct, notwithstanding anything in the service rules applicable to the Respondent, from the salary or wages of the Respondent such sum as it may consider appropriate to be paid to the Complainant or to her legal heirs, as it may determine, in accordance with the provisions of Section 15 of the Act. In the event the Employer is unable to deduct the same or in the event of non-payment of the above-mentioned sum by the Respondent, the same shall be recovered in a manner as prescribed under Section 13 of the Act.

Penalties:

Any person found guilty of violating this Policy as substantiated by data and facts, will be subject to any of the below mentioned disciplinary actions, leading up to and including termination of services, based on the severity of the case.

1. Written apology
2. Warning
3. Reprimand or censure
4. With-holding of promotion
5. With-holding of pay rise or increments
6. Terminating of service
7. Undergoing a counselling session

Additionally, if any party is not satisfied with the recommendation/ decision of the IC, they may appeal to the Tribunal/ Court of appropriate jurisdiction within 90 days of the decision of the IC.

Assistance during criminal proceedings

Irrespective of and without prejudice to the complaints initiated before the IC, the Complainant may, at his/ her sole discretion, also choose to lodge a complaint for the same offense with the Police. In such a situation there shall be no objection by the IC and the Company. In such an event, the Company will attempt to provide all reasonable assistance to the Complainant in filing a complaint with the Police. The Company may also choose to initiate criminal proceedings against the Respondent. The IC shall be bound to provide reasonable assistance to the Police in its investigation. IC may take note of the findings by the Police and/or any other competent authority, in arriving at its recommendations and conclusion.

Interim Relief

The IC is empowered to issue certain interim orders during the pendency of the inquiry on the written request of the Complainant. This is to provide interim protection to the Complainant. These include:

1. Arrange the Complainant to work from home for up to 3 (three) months.
2. A transfer of the Complainant or the Respondent to another workplace.
3. Grant of leave to the Complainant for a period of up to three months;
Note: If the Complainant is granted leave in accordance with this Policy, such leaves shall be in addition to the leave the Complainant is otherwise entitled to.
4. Restrain the Respondent from reporting on the work performance of the Complainant, or from writing their confidential report, and assigning the said task to another officer.
5. Such other relief to the Complainant as may be prescribed in the rules.

This relief is not limited to the complainant but the IC may at its discretion also extend an appropriate interim relief to the witnesses involved in the proceedings.

The Employer shall implement such recommendations and send a report of such implementation to the IC.

Confidentiality

The Company understands that it is difficult to come forward with a complaint of sexual harassment. To protect the interests of the Complainant, Respondent, and Witnesses, confidentiality will be maintained throughout any inquiry process to the extent practicable and appropriate under the circumstances.

The identities of the Complainant, the Respondent, and the Witnesses involved with the process are kept confidential. Where any person entrusted with the duty to handle or deal with the complaint, inquiry or any recommendations or action to be taken under the provisions of the Act violates confidentiality, they shall be liable for penalty as may be prescribed in the Rules.

Where any Employee who is part of the proceedings of the complaint as a witness, Complainant, and/or Respondent violates the confidentiality provisions of this Policy they shall be subject to appropriate disciplinary action.

Access to reports and documents

All records of complaints, including contents of meetings held, results of the inquiry conducted, and other relevant material will be kept confidential by the company except where otherwise required by law.

False or Malicious Complaint

In case the complaint is found to be intentionally false and malicious in nature, the Complainant is liable for appropriate disciplinary action. This is only in cases where the Complainant is aware while filing the complaint, that it is false.

These recommendations to be made by the IC will be like the recommendations of disciplinary action to be taken against the Respondent if they are found guilty of sexual harassment, as discussed in clause 6.

In cases where there is insufficient evidence to prove that harassment has taken place, the IC would deem the complaint as not proven. It won't be judged as a false complaint and the Complainant will not be liable.

Compensation

The purpose of compensation is to put the Complainant in the same position as they were had the harassment not occurred. It is the Respondent who shall be liable to make good the financial loss suffered by the Complainant and not the employer.

In addition to the disciplinary action recommended, the IC is empowered to recommend monetary compensation, factoring in the income and financial status of the Respondent, in the following cases:

1. Mental trauma, pain, suffering, and emotional distress;
2. Loss in a career opportunity;
3. Medical expenses (physical and psychiatric).
4. The compensation amount will be paid in a lump sum or instalments.

Protection of Complainant and Witnesses from retaliation

If an employee feels any kind of retaliation, victimization, or discrimination in the nature of intimidation, pressure to withdraw the complaint, or threats for reporting, testifying, or otherwise participating in the proceedings, the employee should immediately report the matter by sending an email to the Presiding Officer of the Internal Committee or any other Internal Committee member. The Company prohibits retaliation against anyone for raising a complaint or helping in addressing the complaint. Any retaliation or reprisals are subject to immediate corrective action, up to and including termination of services. Alleged retaliation or reprisals are subject to the same complaint procedures and disciplinary action as complaints of Sexual Harassment.

If the Complainant or any Witness of the Complainant is being supervised by the Respondent or any of their Witnesses, then such reporting assignments will be changed to the extent possible by the Company.

Reporting by the IC

The IC shall prepare an annual report and file it with the appropriate authority. The annual report shall contain the following details:

1. Number of complaints received in the year
2. Number of complaints disposed of during the year
3. Number of cases pending for more than ninety (90) days
4. Number of workshops or awareness programs conducted.
5. Nature of action taken by the employer

Modification and review of the policy

The Company reserves the right to modify and, or review the provisions of this Policy, to comply with applicable legal requirements, internal policies, or otherwise with a view to revise the provisions of this Policy to the extent deemed necessary by the Company from time to time. Any such changes or modifications may be notified by the Company to its employees in due course.

IC members

The names and contact details of the Members of the IC shall be as communicated by the Company to the Employees from time to time. For any complaints, employees can write to PoSH@piramal.com or they reach out to their Business HR to learn more about their IC members.

Each location/business of the Company in India has a duly constituted IC, details of which can be obtained by any person writing into PoSH@piramal.com . The IC member details would also be sent over email to all employees and displayed in the posters in each of the locations. The maximum term of each member of IC shall be 3 (Three) years from the date of their nomination.

Timelines under the act:

SR. NO.	ACTION POINT	AUTHORITY/CONCERNED PERSON	TIME LIMIT
1	Complaint	Complaint to be lodged by the aggrieved person before the IC	1) within the period of 3 months from the date of the incident, or 2) in case of series of incidents, within the period of 3 months from the date of last incident
2	Initiation of Inquiry Proceedings	By the IC, by sending the copy of complaint To the Respondent	Within the period of 7 working days of receipt of the complaint
3	Reply by the Respondent along with list of documents, names and addresses of witnesses	To the IC	Within 10 working days from the day of receipt of the copy of complaint forwarded by IC.
4	Completion of Inquiry proceedings	By IC	Within 3 months from the date of receipt of complaint
5	Submission of Inquiry Report and Findings along with Recommendations by IC	To the Employer	Within 10 days of completion of Inquiry Proceedings by IC
6	Implementation of Recommendations made in the Inquiry Report of IC	By the Employer	Within 60 days of the receipt of the Recommendations made in the Inquiry Report by IC
7	Appeal	By the aggrieved person	Within a period of 90 days of Recommendations by IC.

Annexure 1

Examples of instances construed as sexual harassment

Sexual harassment is classified as below, which includes but is not limited to the following:

1. Surreptitiously looking or prolonged staring at a person, giving rise to gross discomfort to the person;
2. Telling sexually colored jokes or sending these through text, electronic mail, or other similar means, causing embarrassment or offense, and the same being carried out after the offender has been advised that they are offensive or embarrassing or, even without such advice, when they are by their nature clearly embarrassing, offensive or vulgar;
3. Malicious leering or ogling;
4. The display of sexually offensive pictures, materials, or graffiti;

5. Unwelcome inquiries or comments about a person's sex life;
6. Unwelcome sexual flirtation, advances, and propositions;
7. Making offensive hand or body gestures;
8. Persistent unwanted attention with sexual overtones;
9. Unwelcome phone calls, text messages, online messages/ communication, video calls, or any such verbal or virtual communication with sexual overtones causing discomfort, embarrassment, offense or insult to the receiver;
10. Unsavory remarks about a person's physical characteristics, dress, attitude, etc.;
11. Sexual assault;
12. Malicious and/or unwanted touching or brushing against a victim's body;
13. Requesting sexual favors in exchange for employment, promotion, local or foreign travels, favorable working conditions or assignments, a passing grade, the granting of honors or scholarship, or the grant of benefits or payment of a stipend or allowance;
14. Derogatory or degrading remarks or innuendoes directed toward the members of one sex, or one's sexual orientation or used to describe a person; • Verbal abuse with sexual overtones; and
15. Other analogous cases.