

HR Policy	Company: IRHPL Group of Companies (India Retails & Hospitality Pvt. Ltd., Radiance Aro Hospitality Services Pvt. Ltd. & Aerotree Hospitality and Retail Pvt. Ltd.)
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1. Introduction

- 1.1. IRHPL Group of Companies (“**IRHPL**”) consist of three companies- India Retails & Hospitality Pvt. Ltd., Radiance Aero Hospitality Services Pvt. Ltd. & Aerotree Hospitality and Retails Pvt. Ltd. IRHPL is committed to creating a healthy working environment that enables employees to work without fear of prejudice, gender bias and sexual harassment. IRHPL also believes that all employees of IRHPL have the right to be treated with dignity. Sexual harassment at the workplace or other the workplace if involving employees is a grave offence and is, therefore, punishable.
- 1.2. The Hon’ble Supreme Court in the landmark judgment, Vishaka & Ors. v. State of Rajasthan, (1997) 7 SCC 323, issued the “Vishaka Guidelines” to prevent and redress workplace sexual harassment, which have since been codified by the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and its Rules. The Hon’ble Court has mandated that employers establish clear guidelines and a dedicated forum for the prevention, prohibition, and redressal of sexual harassment at the workplace.
- 1.3. In alignment with these directions and the statutory framework, this Policy (“**Policy**”) is formulated with full cognizance of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and the accompanying Rules notified on 09.12.2013. The Policy aims to ensure a safe, dignified, and equitable work environment and provides comprehensive protection against sexual harassment, together with a fair, confidential, and time-bound mechanism for receiving, inquiring into, and resolving complaints, including matters connected with or incidental to such conduct.
- 1.4. This Policy extends to all employees, including individuals coming to the workplace for employment or for any other purpose whatsoever, including but not limited to visitors, vendors, contractual resources, secondees and applies to any alleged act of sexual harassment against persons at the workplace, whether the incident has occurred during or beyond office hours.

2. OBJECTIVES:

- 2.1. IRHPL is committed to providing a safe and respectful work environment for all employees, free from any form of sexual harassment. This Policy outlines our commitment to preventing sexual harassment in the workplace and provides guidelines for reporting and addressing any incidents that may occur.
- 2.2. This Policy applies to all employees, including full-time, part-time, temporary, and contract workers, as well as interns, volunteers, and any other individuals associated with IRHPL.
- 2.3. IRHPL has zero tolerance for harassment, intimidation or humiliation of a sexual or gender-based nature in its workplace and is dedicated to ensuring the enactment, observance and adherence of guidelines and best practices that prevent and prosecute

acts of sexual harassment. IRHPL perceives harassment as a form of discrimination that is offensive, undermines the integrity of employment relationships and causes serious harm to the productivity, efficiency and stability of the IRHPL.

- 2.4. Sexual harassment, including discrimination or intimidation of a sexual or gender-based nature by or towards any employee in the workplace, will not be condoned. The IRHPL will not tolerate retaliation in any form against person(s) for raising sexual harassment complaints or concerns.
- 2.5. This Policy applies to all allegations of sexual harassment made by any person or persons against another person or persons, irrespective of whether sexual harassment is alleged to have taken place within the IRHPL premises or in any other place visited by such person(s) for work. All actions prohibited for an employee of the IRHPL by this Policy are also prohibited for all individuals who are on the IRHPL premises or on any other property where the IRHPL conducts its business.
- 2.6. If an individual commits an act in violation of this Policy, whether an employee of IRHPL or a third party interacting with it, IRHPL 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 he or she had actual knowledge of such conduct and the authority to do so.

3. DEFINITIONS:

- a. "**Act**" means Sexual Harassment of Women at Workplace (Prevention, Prohibition, and Redressal) Act, 2013, read with the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Rules, 2013, including any statutory amendment or re-enactment thereof.
- b. "**Aggrieved 'Woman'**" means a woman, of any age, whether employed or not, who alleges to have been subjected to any act of Sexual Harassment at the IRHPL workplace by the Respondent.
- c. "**Aggrieved Person**" means a person, of any gender or having any gender identity, of any age, whether employed or not, who alleges to have been subjected to an act of Sexual Harassment at the IRHPL workplace by the Respondent.
- d. "**Employer**" means IRHPL acting through its authorized representatives, and includes any person responsible for management, supervision and control of the workplace.
- e. "**Employee**" means any person employed at the workplace for any work on a regular, temporary, ad hoc or daily wage basis, either directly or through an agent/contractor, including those engaged on a casual or project basis, trainees, apprentices, interns, probationers, consultants, volunteers, part-time workers, and individuals engaged through third parties.
- f. "**Workplace**" includes all offices, branches, sites, outlets, and any location visited by employees arising out of or during the course of employment, including transportation

provided by the employer; customer or vendor premises; offsite meetings, trainings, and events; residences or accommodations provided by the employer; and digital/virtual work environments and communication channels used for work.

g. **"Sexual Harassment"** means any one or more of the following unwelcome acts or behavior (whether directly or by implication), namely: -

- (i) physical contact and advances; or
- (ii) a demand or request for sexual favors; or
- (iii) making sexually coloured remarks; or
- (iv) showing pornography; or
- (v) any other unwelcomed physical, verbal or non-verbal conduct of sexual nature

Circumstances that may amount to sexual harassment include, among other things:

- (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,
- (v) Humiliating treatment likely to affect her health or safety.

Sexual harassment may be of two kinds:

- (i) indirect, also referred to as a "hostile work environment" and
- (ii) direct, also referred to as a "quid pro quo".

(i) The indirect form of sexual harassment is one or more instances of unwelcome conduct that, taken individually or together, have the purpose or effect of

- creating an intimidating, hostile, or offensive work environment, and
- unreasonably interfering with another's work performance.

Examples of this type of sexual harassment include pornography in public places, foul language or joking of a sexual nature. This is of sexual harassment that does not need to be directed at any employee.

(ii) Sexual harassment by one in a position of power or influence constitutes direct, or quid pro quo, sexual harassment when:

- Submission by an individual is made either an explicit or implicit term or condition of employment, or
- Submission to or rejection of such conduct is used as the basis for employment decisions affecting that employee, such as promotions, demotions, salary raises, hiring or termination.

4. SCOPE:

- 4.1. Prohibited Conduct** – All forms of sexual harassment are prohibited in the workplace, whether committed by employees, supervisors, clients, customers or may other individual associated with IRHPL. This applies to conduct that occurs on IRHPL premises, during work-related events or activities and through electronic communications channels. Harassment by third parties such as vendors, clients, or visitors will also be addressed under this Policy, and IRHPL shall assist the aggrieved individual in pursuing legal or remedial action.
- 4.2. Reporting procedure** – Employees who experience or witness sexual harassment are encouraged to report the incident promptly to HR Spoc or any designated individual within the organisation. Reports to be made in writing, and confidentiality will be maintained to the extent possible while conducting a thorough investigation. Complaints can also be filed electronically at icc@irhpl.in, and assistance will be provided if the complainant is unable to make a written complaint.
- 4.3. Investigation and Resolution** – IRHPL will promptly investigate all reports of sexual harassment in a fair and impartial manner. Investigations will be conducted by trained personnel, and appropriate action will be taken to address and resolve the situation. This may include disciplinary action, up to and including termination of employment, for individuals found to have engaged in sexual harassment. The Internal Committee shall have the powers of a civil court under the Code of Civil Procedure, 1908, for summoning witnesses, requiring document production, and examining evidence.
- 4.4 Non-Retaliation** - Retaliation against any individual who reports sexual harassment or participates in an investigation is strictly prohibited. IRHPL will take appropriate measures to prevent and address any retaliation, and individuals found to have engaged in retaliatory behaviour will be subject to disciplinary action.
- 4.5. Training and Awareness** – IRHPL will provide regular training and awareness programs on sexual harassment prevention for all employees. Training will cover the definition of sexual harassment, reporting procedures, and the consequences of engaging in or condoning such behaviour.

5. GOVERNANCE STRUCTURE:

HR SPOC ➡ **Internal Complaint Committee** ➡ **Senior Management**

6. CONSTITUTION OF INTERNAL COMMITTEE:

A minimum quorum of three internal committee members, including the Presiding Officer and at least 50% (fifty per cent) women members, is required for any meeting or inquiry. An Internal Committee (IC) will be set up by IRHPL in accordance with the provisions of law, which will deal with all cases of alleged sexual harassment, whether escalated to it by any employee or taken up Suo moto by IRHPL, to prevent and deal with sexual harassment and to otherwise implement the Policy. IC members are below: -

S. No.	Name	Designation	Role in Committee	email Id.
1	Ms. Kavita Tiwari	Vice President Business Expansion and New Projects	Presiding Officer	Kavita.Tiwari@rhpl.in
2	Ms. Anoushka Avinash Shinde	Assistant General Manager	Member Secretary	Anoushka@irhpl.in
3	Mr. Mohit Kapil	Assistant General Manager- HR & Admin	Member	mohit.kapil@rhpl.in
4	Ms Charu Singh		External Member	2005charusingh@gmail.com

Internal Committee members will hold office for a maximum of three (3) years. In case any member is a complainant/respondent in a matter, they shall recuse themselves until the matter is resolved.

7. COMPLAINT PROCESS:

7.1. Procedure for Lodging a Complaint: -

- Any Aggrieved Person (“**Complainant**”) may file a written complaint of Sexual Harassment with any IC member.
- If not in writing, the IC shall assist the Complainant in reducing it to writing.
- In case of incapacity or death, a person authorised under the POSH Act may file on her behalf.
- The complaint must be filed within 3 months of the incident (or last incident in case of a series), extendable by another 3 months if justified in writing by the IC.
- The complaint should be in the prescribed format, along with supporting documents and witness details.
- If a complaint (oral or written) is received by any department head/HR, it must be forwarded promptly to the Presiding Officer, with necessary assistance to the Complainant.
- Within **7 days**, the Presiding Officer shall determine if a prima facie case exists:
 - a. If not, the Complainant will be informed in writing with reasons.
 - b. If yes, a copy of the complaint, documents, and witness list will be sent to the Respondent within 7 working days.
- At the Complainant’s request, the IC may facilitate conciliation **before inquiry**, provided it does not involve monetary settlement.

Any settlement reached shall be recorded, forwarded to the CEO/authorised person for action, and shared with both parties. No inquiry will be conducted thereafter.

7.2 Filing of complaint by an employee

- Upon receiving a complaint from any aggrieved employee (at stores), HR SPOC

has to communicate all the received complaints (*on redressal email id or through letter*) to the respective SPOC within two (2) working days for necessary proceedings

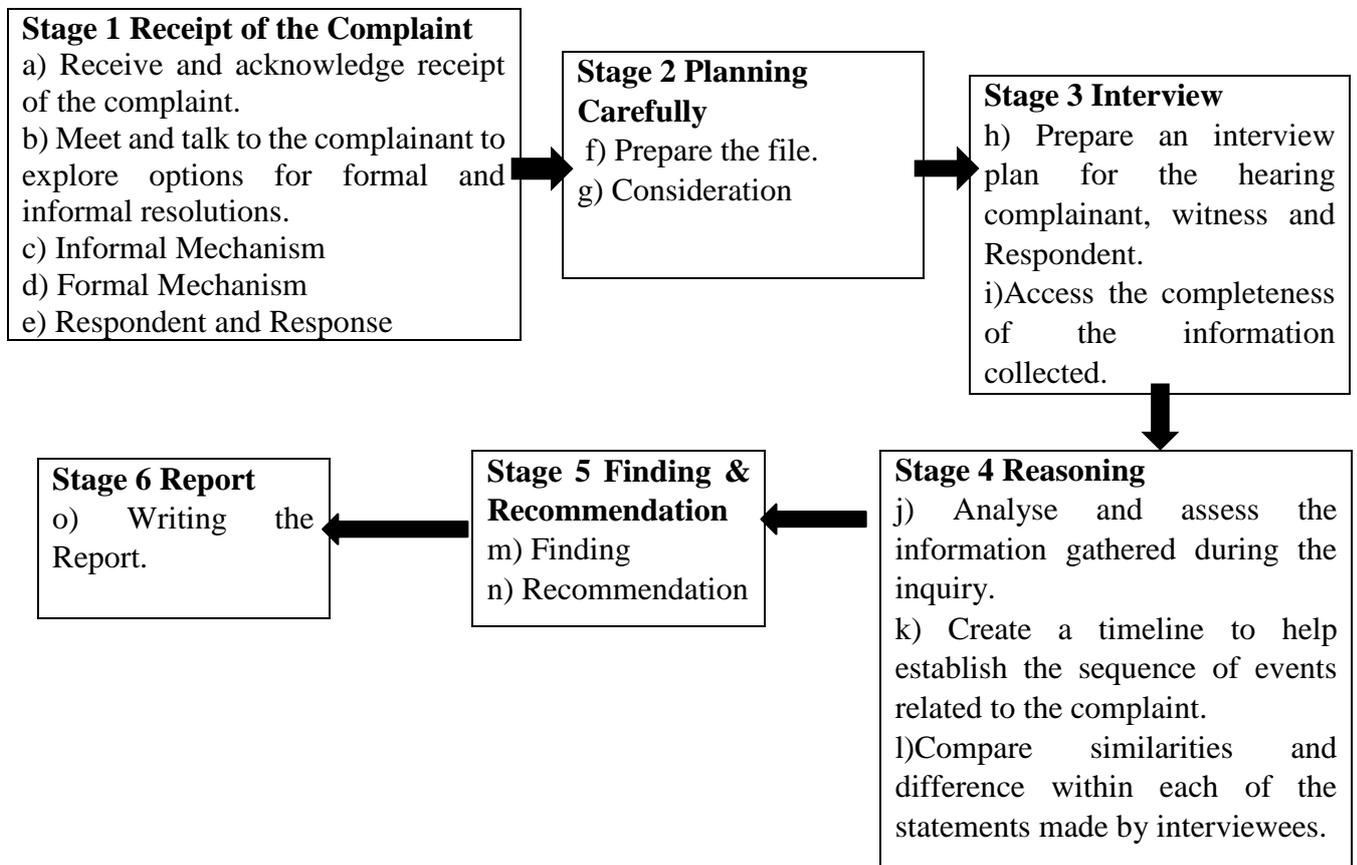
- Within five (5) working days of the receipt of the complaint from HR SPOC, he has to send a copy of the complaint to the Respondent.
- The respondent shall file his reply to the complaint along with his list of documents, and names and addresses of witnesses, within a period not exceeding ten (10) working days from the date of receipt of the documents specified under sub-rule (1)
- Upon receiving a reply from the Respondent, HR SPOC has to file the reply received from the Respondent with the Internal Committee (IC) within three (3) working days for necessary assessments and proceedings.
- HR-SPOC lines up the first meeting with Complainant & Respondent
- At the first meeting, the Complainant shall be heard, and the SPOC (keeping HR SPOC and Internal Committee informed) may, before initiating an enquiry and at the request of the Complainant, take steps to settle the matter between the Complainant and the Respondent through conciliation; provided there can be no monetary settlement as the basis of conciliation.

7.3. Procedure for Inquiry:-

- If conciliation is not sought, fails, or its terms are breached, the Internal Committee shall conduct an inquiry in accordance with this Policy and the principles of natural justice.
- At least three Internal Committee members, including the Presiding Officer/Chairperson, must be present.
- The Respondent will be given ten working days to file a written reply with supporting documents and a witness list. A copy shall be shared with the Complainant. The Internal Committee shall convene within 15 days of receiving the complaint and notify both parties.
- Both parties must appear in person; representation through an attorney is not permitted. Parties may submit documents/evidence and examine witnesses by prior written intimation. True copies must be exchanged between parties.
- The Internal Committee may summon witnesses, call for documents, and both parties may cross-examine witnesses.
- The Internal Committee shall complete the inquiry within 90 days and provide a closure report with findings to the CEO/authorised person and HR. Copies will be shared with both parties. Based on findings, the Internal Committee may recommend:
 - No action (allegation not proved).
 - Action against the Respondent (allegation proved).
- If a conciliation has been reached, then SPOC shall prepare the report of the same and submit the same to the Committee

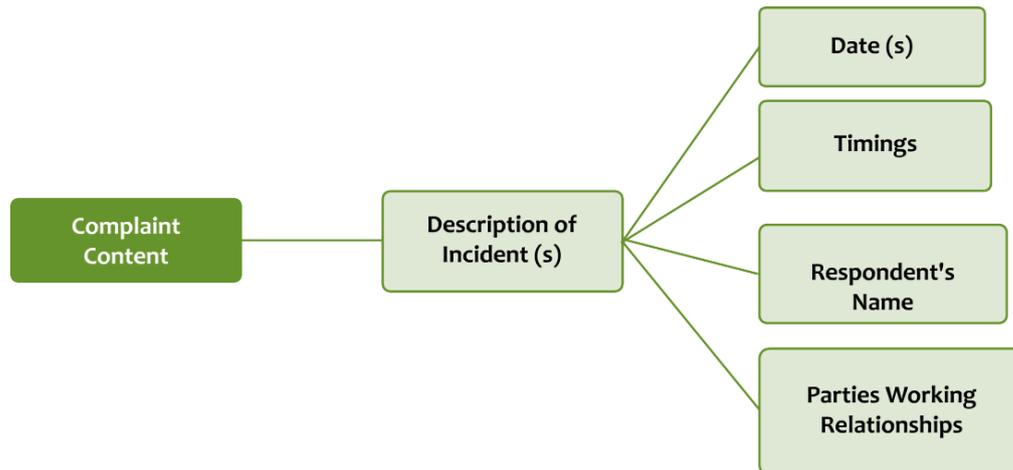
IC shall complete the inquiry within 90 days from the receipt of the complaint.

- After completing the inquiry, IC shall submit the findings to the employer within 10 days.
- During the pendency of the inquiry, on a written request made by the complainant, the committee may recommend to the management for implementation -
- Transfer the complainant or the respondent to any other workplace.
- Grant leave to the complainant of a maximum of 3 months, in addition to the leave they would be otherwise entitled.
- Prevent the respondent from assessing the complainant’s work performance.
- Grant such other relief as may be appropriate.



7.4. The Complaint Contains:-

The written complaint should detail each incident, including relevant dates, times, and locations. It should also include the names of the respondent(s) and describe the working relationship between the parties involved. If the complainant needs assistance in writing the complaint for any reason, a designated person responsible for managing workplace sexual harassment complaints is required to provide help.



8. ROLES & RESPONSIBILITIES:

8.1. Roles & Responsibilities of an Individual: -

- It is the responsibility of all to respect the rights of others and to never encourage harassment.
- Refuse to participate in any activity which constitutes harassment. Inform the harasser that the behaviour is unwelcome and demand that the harassment be stopped immediately. Immediately inform the IC of any such harassment
- Do not pretend it did not happen. Do not feel compelled to accept unacceptable behaviour even if others do.
- If you have witnessed any act of sexual harassment, act as a witness if the person being harassed decides to lodge a complaint.
- In case any employee approaches you claiming they have been sexually harassed, direct them to file a complaint with any member of the IC or support them by writing a complaint on their behalf to the IC. However, the email shall not be marked CC/BCC to any other person except IC members.
- Always be supportive and sensitive towards the complainant. Do not judge the situation. You can guide the person to file the complaint via appropriate means.
- Make sure all persons are treated equally and ensure a healthy workplace. The complainant, respondent/s, or witnesses will not be victimized in any way.

8.2. Responsibility of IRHPL:-

- IRHPL will ensure that the details of the present Policy, including the contact details of the Internal Committee members, are effectively communicated to all employees at all locations & sites.
- IRHPL shall provide all the assistance to the Internal Committee members in the investigation of the complaint by securing the attendance of any person or witnesses and making available all the information and material required for the purpose of a fair investigation.

- IRHPL shall provide all assistance to the complainant, should she decide to go to the police or any other statutory authority as per the law.
- IRHPL shall submit to the state authorities the report on the number of cases filed and actions taken as provided for by the law.
- IRHPL shall take all preventive and corrective measures to ensure a safe work environment for women.
- IRHPL shall organize workshops and awareness programmes at regular intervals for sensitising the employees with the provisions of the Act and orientation programmes for the members of the Internal Committee in the manner as may be prescribed.

9. ACTIONS TAKEN BY THE MANAGEMENT:

Once the recommendations for interim relief are implemented, the Management will submit an action-taken report to the committee within 7 days of implementation. If the complaint of sexual harassment is substantiated, the accused will face one or more disciplinary actions, which may include:

- Deducting an amount from the salary, as deemed appropriate by the IC, to be paid to the complainant.
 - Issuing a written apology.
 - Issuing a warning, reprimand, or censure.
 - Withholding promotion.
 - Withholding pay rise or increment.
 - Immediate termination.
 - Requiring the accused to undergo counselling sessions.
 - Mandating community service.
 - Any other action that the Committee deems appropriate.
- No person involved in the investigation shall be victimised or subjected to any unfavourable treatment.
 - This policy does not limit the Management's authority to impose additional disciplinary actions beyond the recommendations of the IC.
 - If the accused's conduct constitutes a specific offence under the Indian Penal Code or any other applicable law, the organisation will support the complainant in initiating appropriate legal action.

10. PUNISHMENT:

If the Internal committee determines that the allegations are malicious, the complaint is knowingly false, or forged/misleading documents were used, it may recommend disciplinary actions such as: a

- Salary deduction payable to the respondent.
- Written apology.
- Warning, reprimand, or censure.
- Withholding promotion.
- Withholding a pay rise or increment.
- Immediate termination

- Counselling sessions.
- Community service.
- Other actions deemed appropriate by the Committee.

The IC must establish malicious intent before recommending any action. If a witness provides false evidence or forged/misleading documents, the IC may recommend actions as specified.

Annual Reporting: The IC shall prepare and submit an annual report to the employer and the District Officer as per Section 21 of the POSH Act. The report shall include the number of complaints received, disposed of, pending, and actions taken.

Display Requirement: Contact details of the Internal Committee shall be displayed prominently at all office locations, and Policy shall be made accessible on the IRHPL intranet.

11. CONFIDENTIALITY:

The IRHPL, the IC and all those participating in the inquiry, that is, the Aggrieved Woman, the Respondent and Witnesses and Employees of IRHPL Group must always maintain confidentiality while dealing with a case of sexual harassment at the Workplace. Breach of confidentiality leading to revealing the names of the Aggrieved Woman, Respondent or Witnesses, any information relating to conciliation and inquiry proceedings, recommendations of the Internal Committee or the Local Committee, as the case may be, and the action taken by the employer or the District Officer under the provisions of the Act will be punished.

12. APPEAL:

Any person aggrieved with the recommendations of the IC or the non-implementation thereof or due to disclosure of the contents of a Sexual Harassment complaint, the identity and addresses of the Complainant, Respondent and the witnesses, any information relating to conciliation or inquiry proceedings, report and/or recommendations of the IC and the action taken by IRHPL Group, may prefer an appeal in accordance with the provisions of the Act.

13. Approval & Effective Date

This Policy is effective from 25th September'2025 and supersedes all previous guidelines on consequence management.

This Policy shall be read in conjunction with applicable labour laws, employment contracts, and Company policies. In case of any conflict, statutory provisions shall prevail. The Company reserves the right to amend or modify this policy as per business and legal requirements.

Approved by:

Naresh Sharma

CEO

25th Sep'2025

