



POLICY FOR PREVENTION OF SEXUAL HARASSMENT AT WORK PLACE

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PREAMBLE

At V2 Retail Limited (“” or “Company”), we treat each other with respect and dignity and expect everyone to promote a sense of personal responsibility. We recruit competent and motivated people and expect them to adhere to the Code of Conduct & Core Values. SOL believes in equal opportunities to its employees and does not discriminate on basis of gender, race, caste, religion etc. and does not tolerate any form of harassment or discrimination at work place.

The ‘Policy against Prevention of Sexual Harassment at workplace and Guidelines for intends to provide prevention and protection against sexual harassment of its employees at workplace and redressal mechanism for complaints related to sexual harassment. is committed to creating a safe and healthy work environment that enables its employees to work without fear of prejudice, gender bias and sexual harassment also believes that all its employees have the right to be treated with dignity. Sexual Harassment at the work place or in the course of official duties, if involving employees of shall be considered a grave offence, and is therefore punishable under the applicable laws.

APPLICABILITY AND SCOPE

2.1 This Policy extends to all employees of and is deemed to be incorporated in the service conditions of all employees and comes into effect immediately. These Rules and Procedures shall be applicable to all complaints of sexual harassment made against an employee of provided the harassment has taken place at work place or during the course of discharge of official duties.

2.2 This policy shall be applicable to all employees of and its subsidiaries/sister concerns in India. It includes all categories of employees of the Company, including permanent management and workmen, temporary appointees, trainees and employees on contract at its workplace or at client sites. It shall also include any unwelcome behaviour of a sexual nature mentioned in the policy by any other employees, customers, consultants, visitors, vendors, contractors or other non-employees during the course of a business relationship, to any of our employees.



2.3 The scope of the policy is restricted to the following for all employees:

1. Business locations of the company
2. Any external location visited by associates due to or during the course of their employment with the company such as business locations of other companies/entities, guest house etc.
3. Any mode of transport provided by the company (or a representative of the company) for undertaking a journey to and from the aforementioned locations.

DEFINITIONS

• “Sexual Harassment” Sexual Harassment can occur between individuals of the opposite sex or the same sex. This may include but is NOT limited to unwelcome sexual behaviour of direct or implied nature such as:

1. Inappropriate physical contact and advances; or
2. 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. The following circumstances, among other circumstances, if it occurs or is present in relation to or connected with any act or behaviour of sexual harassment may amount to sexual harassment:
 - i) Implied or explicit promise of preferential treatment in employment; or
 - ii) Implied or explicit threat of detrimental treatment in employment; or
 - iii) Implied or explicit threat about present or future employment status; or
 - iv) Interference with work or creating an intimidating or offensive or hostile work environment; or
 - v) Humiliating treatment likely to affect health or safety.

"Sexual harassment" would also mean:



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1. Quid pro quo sexual harassment, which means something in return or an exchange of one thing for another.

- In the workplace, quid pro quo sexual harassment takes place if sexual favors are asked in exchange for any kind of special treatment on the job. Threatening an associate if he/she does not consent to such sexual advances or favors, also amounts to sexual harassment. The act of 'asking' may either be verbal or implied and the 'sexual conduct' may be verbal or physical. But, in either case, it must be unwelcome.
- For eg: direct or implied requests or offers by any associate for sexual favors in exchange for actual or promised job benefits such as favorable reviews, salary increases, promotions, increased benefits, or continued employment constitutes sexual harassment.

2. Hostile work environment includes:

- Hostile environment sexual harassment occurs when either speech or conduct of a sexual nature takes place, and is seen or perceived as offensive and interferes with the work performance of the recipient, or any one or more associates
- Hostile environment sexual harassment may also include intimidating or harassing conduct that is directed at an individual, or a group of individuals.
- It will also mean related retaliation which includes marginalizing someone in the workplace with regard to his/her roles and responsibilities, socially ostracizing, intimidating someone physically, psychologically, and emotionally or someone close to or related to the victim.

This is only an indicative list of the possible acts which could be treated as sexual harassment and is in no way intended to be construed as an exhaustive list.

- “Aggrieved” In relation to workplace, a person of any age employed with SOL including interns who alleges to have been subjected to any act of sexual harassment by the Respondent.
- “Respondent” means the person against whom the aggrieved has made a complaint



INTERNAL COMPLAINTS COMMITTEE / COMPLAINT REDRESSAL COMMITTEE

5.1 An Internal Complaints Committee/ Complaint Redressal Committee (hereinafter called 'Committee') have been constituted by the Management of the Company to consider and redress complaints of Sexual Harassment.

The Chairperson and Members of the Committee are as follows:

- (i) Ms Uma Aggarwal - Chairperson/ Presiding Officer
- (ii) Ms Apoorva Pandey - Member
- (iii) Ms Varinda Khanna - Member
- (iv) Mr Kshitij Aggarwal - Member
- (v) Member from NGO- External Member (Appointed or Nominated case to case basis)

5.2 At least one-half of the total Members so nominated shall always be women. A Quorum of three members is required to be present for the proceedings to be conducted in the Committee. The Quorum shall include the Chairperson, at least two members, out of which one Member shall be a woman.

The Presiding Officer and every Member of the Internal Committee shall hold office for such period not exceeding three years, from the date of their nomination as may be specified by the Company.

5.3 No person who is a complainant, witness or Respondent in the complaint of sexual harassment shall be a member of a Committee.

5.4 Any Committee member charged with sexual harassment in a written complaint must step down as a member during the enquiry into that complaint.



REPORTING AND REDRESSAL PROCESS

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

A. INFORMAL RESOLUTION OF COMPLAINT

1. When an incident of sexual harassment occurs, the victim of such conduct can communicate her disapproval and objections immediately to the harasser and request the harasser to behave decently.

2. If the harassment does not stop or if victim is not comfortable with addressing the harasser directly, she can bring her concern to the attention of the Internal Complaints Committee for redressal of her grievances. The Internal Complaints Committee will thereafter provide advice or extend support as requested and will undertake prompt investigation to resolve the matter. The Internal Complaints Committee shall give an option of conciliation to the parties. However such option will be exercised only on free will and volition of the Aggrieved.

B. COMPLAINTS

6.1 The mechanism for registering complaints is safe, accessible and sensitive. All complaints must preferably be brought by the complainant in person. All precaution will be taken to protect the privacy of the individuals involved. Any aggrieved employee who is of the view that he/she is being sexually harassed directly or indirectly, may submit a complaint of the alleged incident to any or all the members of the Committee in writing with his/her signature within three months from the date of occurrence of incident. It is also encouraged that both parties maintain records of all incidents, such as, physical copies of emails, details of dates, places, witnesses and their feelings at the time of the alleged harassment. Provided however that where such complaint cannot be made in writing, the Chairperson or any Member of the Internal Complaints Committee, as the case may be, shall render all reasonable assistance to the individual concerned for producing the complaint in writing.

6.2 If an employee believes that he/she is experiencing retaliation of the nature of intimidation, pressure to withdraw the case or threats for reporting, testifying or otherwise participating in the



proceedings before the Committee, then, such employee should immediately report the matter to the Committee. Such incidents shall be treated as seriously as an alleged case of Sexual Harassment and will apply even if the original complaint is not given. Similarly, any undue influence whether direct or indirect, to the proceedings by any party shall be construed as 'Misconduct' and shall attract disciplinary action.

6.3 The Committee shall hold a meeting with the Complainant within ten working days of the receipt of the complaint, but no later than fifteen working days in any case. In exceptional cases, emergency meeting may be convened by the Chairperson as per the requirement.

6.4 Thereafter, the Committee shall summon the person against whom the Complaint is made for the purposes of a deposition before the Committee and an opportunity shall be given to such person to give an explanation to the allegations, where after, an 'Inquiry' shall be conducted and concluded.

6.5 In case of the complaint being found and determined to be of malafide intent or blatantly false or that the incident was publicized without going through the recommended process, such behavior will be construed as a misconduct and the Complainant shall, if deemed fit be liable for appropriate disciplinary action including but not limited to termination of services by the Management of the Company.

6.6 If the Committee decides not to conduct an enquiry into a complaint, it shall record the reasons for the same in the minutes of the Committee meeting. The Committee shall make the same available to the Complainant in writing.

C. MANNER OF TAKING ACTION AGAINST THE RESPONDENT

Where the Complaints Committee arrives at the conclusion that the allegation against the respondents have been proved, it shall recommend to the HR Director of SOL to take action which may include the following: a. Written apology; b. Warning; c. Reprimand or Censure; d. Withholding of



Promotion; e. Withholding of pay rise or increments; or f. Terminating the respondent from service. Where any conduct, on the part of the respondent(s)/ accused, amounts to a specific offence under law, the Company shall initiate appropriate action in law by making a complaint with the appropriate authority or by providing necessary support to the Aggrieved for the same.

D. PUNISHMENT FOR FALSE OR MALICIOUS COMPLAINT AND FALSE EVIDENCE

Where the Internal Complaints Committee arrives at a conclusion that the allegation against the respondent is malicious or the aggrieved woman or any other person making the complaint has made the complaint knowing it to be false or the aggrieved woman or any other person making the complaint has produced any forged or misleading document, it may recommend to the employer to take action in accordance with the provisions of this policy and the service rules applicable to her or him.

E. 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. To protect the interests of the victim, the accused person and others who may report incidents of sexual harassment, confidentiality will be maintained throughout any investigatory process to the extent practicable and appropriate under the circumstances.

F. ACCESS TO REPORTS AND DOCUMENTS

All records of complaints, including contents of meetings, results of investigations and other relevant material will be kept confidential by the Company after conclusion and shall be destroyed in due course except where disclosure or record is required under disciplinary or other remedial processes.

G. 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 endeavor to ensure that victim or witnesses are not victimized or discriminated against while



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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.

CONCLUSION

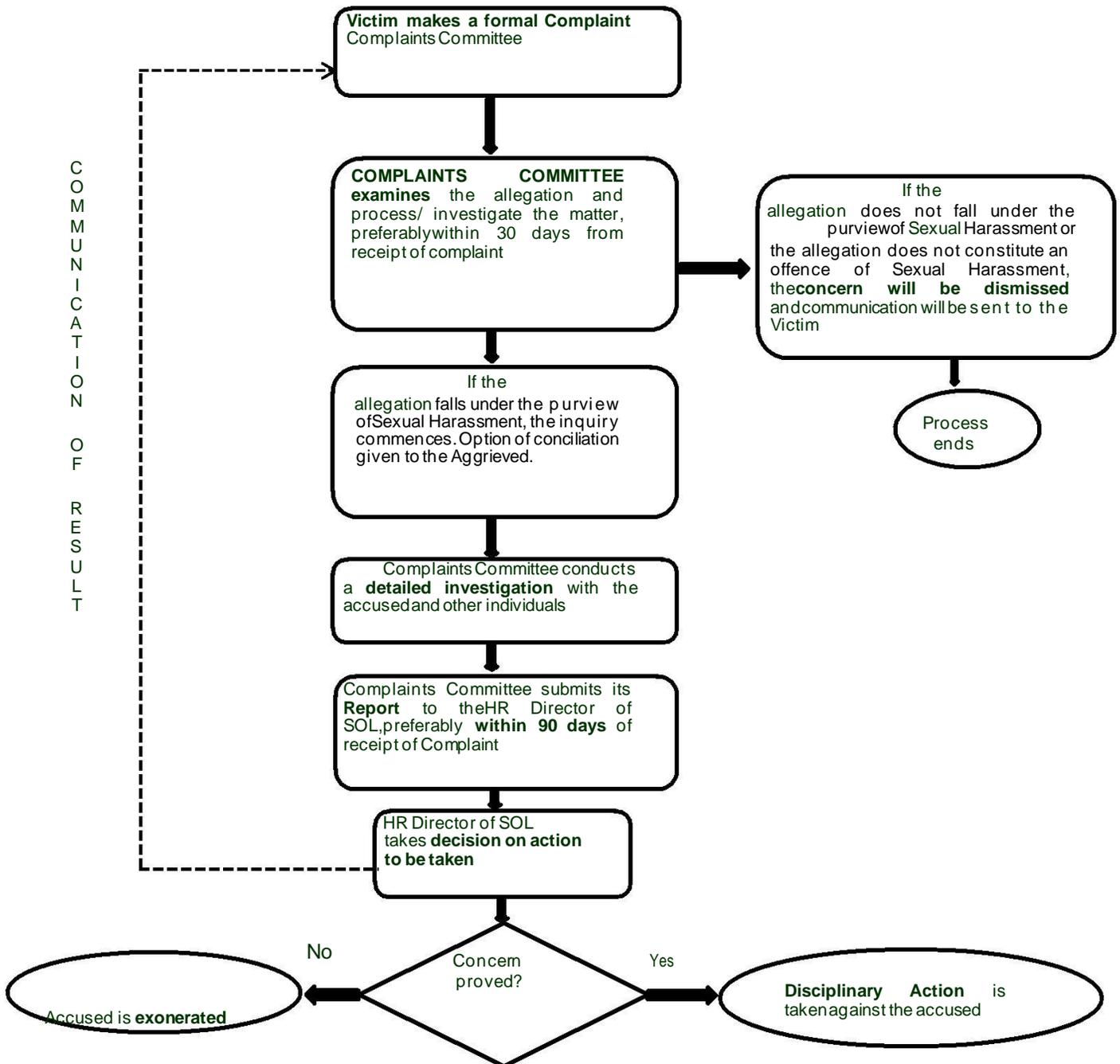
In Conclusion, the Company reiterates its commitment to providing its employees, a workplace free from harassment/ discrimination and where every employee is treated with dignity and respect. All employees are required to mandatorily adhere to the policies including but not limited to the Code of Conduct and Global Ethical policies in addition to the guidance provided under this policy.



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Annexure A

PROCESS FLOW





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Disciplinary Action shall be taken against the Complainant, if deemed fit