



VENTIVE HOSPITALITY LIMITED
(Formerly known as “Ventive Hospitality Private Limited” AND “ICC Realty (India) Private Limited”)
ANTI SEXUAL HARASSMENT POLICY

1. TITLE

This policy shall be called the ‘Anti Sexual Harassment Policy’ (“Policy”).

2. COMMENCEMENT

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 workplace, whether the incident has occurred during or beyond office hours and it is deemed to be incorporated in the service conditions of all employees and comes into effect immediately.

3. PURPOSE

3.1 Ventive Hospitality Limited (the “Company”), is an equal employment opportunity company and is committed to creating a healthy working environment that enables Employees (as defined below) to work without fear of prejudice, gender bias and sexual harassment. Further, the purpose provide protection against sexual harassment of women at workplace and the prevention and redressal of complaints of sexual harassment and matters related to it. The Company also believes that all Employees (as defined below) of the Company have the right to be treated with dignity. Sexual harassment at the workplace or other than workplace if involving employees is a grave offence and is therefore punishable.

3.2 The supreme court of India has also directed companies to lay down guidelines and a forum for redressal of grievances related to sexual harassment.

4. DEFINITIONS

4.1 “Board” means the Board of directors of the Company.

4.2 “Company” means Ventive Hospitality Limited.

4.3 “Employee” means a person employed at a Workplace for any work on regular, temporary, ad hoc or daily wage basis, either directly or through an agent, including a



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contractor, with or, without the knowledge of the principal employer, 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.

4.4 “Bharatiya Nyaya Sanhita” means the Bharatiya Nyaya Sanhita, as amended from time to time.

4.5 “Internal Committee” means and include an Internal Complaints Committee (hereinafter referred to as the “Committee”).

4.6 “Member” means a member of the Internal Committee.

4.7 “Parties” means collectively the complainant and the respondent.

4.8 “Policy or “This Policy” means, the Anti Sexual Harassment Policy.

4.9 “Presiding Officer” means the presiding officer of the Committee and shall be a woman employed at a senior level at the Workplace amongst the Employees.

4.10 “Workplace” means establishments, enterprises, institutions, offices, branches, premises, locations or units established, owned, controlled by the Company or places visited by the Employees out of or during the course of employment including accommodation, transportation provided by the employer for undertaking such journey.

5. SCOPE

A. Sexual harassment shall mean and include (whether direct or implied) any of the following:

(a) Any unwelcome sexual advances, requests or demand for sexual favours, either explicitly or implicitly, in return for employment, promotion, examination or evaluation of a person towards Company’s activity;

(b) Any form of unwelcome sexual advances involving verbal, non-verbal, or physical conduct such as sexually coloured remarks, jokes, letters, phone calls, e-mail, gestures, showing of pornography, lurid stares, physical contact or molestation, stalking, sounds, display of pictures, signs, verbal or non-verbal communication which offends the individuals sensibilities and affect her / his performance;

(c) eve teasing, innuendos and taunts, physical confinement against one’s will and likely to intrude upon one’s privacy;

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- (d) act or conduct by a person in authority which creates the environment at Workplace hostile or intimidating to a person belonging to the other sex;
- (e) conduct of such an act at Workplace or outside in relation to an Employee of the Company, or vice versa during the course of employment; or
- (f) any unwelcome gesture by an Employee having sexual overtones;
- (g) Physical contact or advances
- (h) Staring, leering, unwelcome touching
- (i) Any unwelcome sexual activity tied to employment decision or benefits; and
- (j) Any other unwelcome physical, verbal, or nonverbal conduct of sexual nature.

B. The following circumstances, among other circumstances, if it occurs or is present in relation to connected with any act or behaviour of sexual harassment may amount to sexual harassment:

- a. Implied or explicit promise of preferential treatment in employment; or
- b. Implied or explicit threat of detrimental treatment in employment; or
- c. Implied or explicit threat about the present or future employment status; or
- d. Interference with work or creating an intimidating or offensive or hostile work environment for the person; or
- e. Humiliating treatment affecting any person's health or safety.

6. COMPLAINT REDRESSAL COMMITTEE - INTERNAL COMPLAINTS COMMITTEE

6.1 Complaints of sexual harassment made by the aggrieved women shall be dealt with by the Internal Committee which shall be constituted once the requirements of forming the Committee, i.e. more than 10 employees, is met by the Company. If number of members falls below the required number, adequate members should be appointed on committee within one (1) working week in consultation with the management, where as in absence of committee the aggrieved party shall file the complaint to the office of collector as per the provisions of POSH Act.

6.2 The declaration of the constituent members of the Committee shall be made through an addendum to this policy.

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6.3 A quorum of three Members is required to be present for the proceedings to take place. The quorum shall include the presiding officer, at least two Members, one of whom shall be a woman.

7. REDRESSAL PROCESS

7.1 Any Employee who feels and is being sexually harassed directly or indirectly may submit a complaint of the alleged incident to any member of the Committee or the Company Secretary of the Company in writing with his/her signature within three months of occurrence of incident.

Provided that where such a complaint cannot be made in writing, presiding officer or any member of the Committee, shall render all reasonable assistance to him/her for making the complaint in writing.

Provided further that the Committee may for the reasons to be recorded in writing, extend the time limit not exceeding three months, if it is satisfied that the circumstances were such which prevented him/her from filing a complaint within the said period.

7.2 The Committee will maintain a register to endorse the complaint received by it and keep the contents confidential, if it is so desired, except to use the same for discreet investigation.

7.3 The Committee will hold a meeting with the complainant within seven days of the receipt of the complaint, but no later than 10 days in any case.

7.4 At the first meeting, the Members shall hear the complainant and record her/his allegations. The complainant can also submit any corroborative material with a documentary proof, oral or written material, etc., to substantiate his / her complaint. If the complainant does not wish to depose personally due to embarrassment of narration of event, a woman officer for woman Employees involved and a male officer for male Employees, involved shall meet and record the statement.

7.5 Thereafter, the person against whom complaint is made may be called for a deposition before the Committee and an opportunity will be given to him / her to give an explanation, where after, an enquiry shall be conducted and concluded.

7.6 In the event the complaint does not fall under the purview of sexual harassment or the complaint does not mean an offence of sexual harassment, the same would be dropped after recording the reasons thereof.

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7.7 In case the complaint is found to be false, the complainant shall, if deemed fit, be liable for appropriate disciplinary action by the Board.

8. ENQUIRY PROCESS

8.1 The Committee shall immediately proceed with the enquiry and communicate the same to the complainant and person against whom complaint is made.

8.2 The Committee shall prepare and hand over the statement of allegation to the person against whom complaint is made and give him / her an opportunity to submit a written explanation if she / he so desires within 10 days of receipt of the same.

8.3 The complainant shall be provided with a copy of the written explanation submitted by the person against whom complaint is made.

8.4 If the complainant or the person against whom complaint is made desires any witness(es) to be called, they shall communicate in writing to the Committee the names of witness(es) whom they propose to call.

8.5 If the complainant desires to tender any documents by way of evidence before the Committee, she / he shall supply original copies of such documents. Similarly, if the person against whom complaint is made desires to tender any documents in evidence before the Committee, he / she shall supply original copies of such documents. Both shall affix his / her signature on the respective documents to certify these to be original copies.

8.6 The Committee shall call upon all witnesses mentioned by both the Parties.

8.7 The Committee shall provide every reasonable opportunity to the complainant and to the person against whom complaint is made, for putting forward and defending their respective case.

8.8 The Committee shall complete the “Enquiry” within reasonable period but not beyond three months and communicate its findings and its recommendations for action to the human resources department. The report of the committee shall be treated as an enquiry report on the basis of which an erring Employee can be awarded appropriate punishment straightaway.

8.9 The human resource head will direct appropriate action in accordance with the recommendation proposed by the Committee.

8.10 The Committee shall be governed by such rules as may be framed by the Supreme Court of India’s orders or any other legislation enacted later on.



9. OTHER POINTS

9.1 The Committee may recommend to the human resource head action to transfer or any of the other appropriate disciplinary action.

9.2 The Board shall provide all necessary assistance for the purpose of ensuring full, effective and speedy implementation of this Policy.

9.3 Where sexual harassment occurs as a result of an act or omission by any third party or outsider, the Company shall take all steps necessary and reasonable to assist the affected person in terms of support and preventive action.

9.4 The Committee shall analyse and put up report on all complaints of this nature at the end of the year for submission to human resources department.

9.5 In the event the Committee finds the degree of offence coverable under the Bharatiya Nyaya Sanhita then this fact shall be mentioned in its report and appropriate action shall be initiated by the Board for making a police complaint.

9.6 The Company shall also ensure inclusion of a statement in the report by its Board stating that the Company has complied with the provisions relating to the constitution of the Committee under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (the "Act").

10. INTERIM RELIEF

During pendency of the inquiry, on a written request made by the complainant, the committee may recommend to the employer to:

- a) Transfer the aggrieved individual or the respondent to any other workplace; or
- b) Grant leave to the aggrieved individual of maximum 3 months, in addition to the leave he/she would be otherwise entitled; or
- c) Grant such other relief to the aggrieved individual as may found to be appropriate; or
- d) Restraint the respondent from reporting on the work performance of the complainant.

Once the recommendation of interim relief is implemented, Presiding Officer shall inform the Committee regarding the same.

11. PROHIBITION ON DISCLOSURE OF INFORMATION



This Policy and the law prohibit any person including Members from publishing, communicating or making known to the public, press and media in any manner, contents of the complaint, the identity and addresses of the aggrieved person, respondent and witnesses, any information relating to conciliation and inquiry proceedings, or recommendations of the Committee during the proceedings under the provisions of the Act. Any violation thereto shall also be subject to applicable disciplinary action.

12. PROTECTION TO COMPLAINANT

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 ensure that the victim or witnesses are not victimized or discriminated against while dealing with complaints of sexual harassment.

However, anyone who abuses the procedure (for example, by maliciously putting an allegation knowing it to be untrue and / or produces any forged or misleading document) will be subject to applicable disciplinary action.

13. APPEAL

Any person aggrieved by the recommendation of Committee may prefer an appeal under the relevant provisions of the Act and the rules applicable thereunder.

14. AMENDMENTS

This Policy shall be reviewed periodically by the Board and amendments effected to subject to approval of the Board if and when practical difficulties are encountered. However, all such amendments are subject to applicable laws, rules and regulations to the Company, from time to time.

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