



SEXUAL HARASSMENT POLICY

1. PURPOSE

At K Raheja Corp, we desire to uphold a healthy and congenial working environment that enables employees to work without fear of prejudice, gender bias and sexual harassment.

2. SCOPE

This policy is applicable to all employees of group companies of K Raheja Corp across all locations. References in this policy to "Employee" shall include Regular Employees and Consultants.

3. INTRODUCTION

We, at K Raheja Corp, value every employee and are committed to protect the dignity and respect of each employee. We have 'zero tolerance' for sexual harassment and any act of sexual harassment will invite serious disciplinary action.

This policy aims to inform the employees about what conduct constitutes sexual harassment and in the unlikely chance of such an occurrence, to enable a fair mechanism for dealing with such misconduct.

4. POLICY COVERAGE

'Sexual Harassment' is any unwelcome sexually determined behavior (whether directly or by implication), such as:

- Physical contact and advances
- A demand or request for sexual favors; whether verbal, textual, graphic, electronic or by any other action.
- Sexually colored remarks
- Showing pornography
- Any other unwelcome physical, verbal or non-verbal conduct of sexual nature whether by words, gestures or actions.

The definition of sexual harassment shall include any harassment caused to female or male employees. It would also include harassment caused to or by either gender.

Document No	Policy Manual Revision No.	Issue Date	Page
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CH RPM-01	11	01 September 2016	2 of 4
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4. COMPLAINT REDRESSAL COMMITTEE

A Committee has been constituted to consider and redress complaints of Sexual Harassment.

Committee

Chairperson	- Ms. Urvi Aradhya, Senior Vice President - Human Resources Email Id: uaradhya@kraheja.com Contact : 9820430056 / 26564564
Member	- Ms. Priyanka Keswani, Sr. Vice President - Taxation & MIS Email Id: priyanka@kraheja.com Contact : 26564751
Member	- Mr. Shabbir Kanchwala , Sr. Vice President - Project Co-ordination, Purchase, Contracts & Billing Email Id: skanchwala@kraheja.com Contact : 26564931
Member	- Ms. Maya Bhat, Advocate (External Committee Member) Email Id: bhattmaya671@gmail.com Contact : 26046149

5. COMPLAINT PROCESS

- I. Any employee who feels being sexually harassed directly or indirectly may submit a complaint of the alleged incident to any member of the Committee in writing with his / her signature within 6 months of occurrence of incident.
- II. The Committee will hold a meeting with the Complainant within a week of the receipt of the complaint. 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.
- III. The Committee shall immediately proceed with the Enquiry and communicate the same to the Complainant and person against whom complaint is made.
- IV. In the event, the complaint does not fall under the purview of Sexual Harassment or the complaint does not constitute an offence of Sexual Harassment, the same would be dropped after recording the reasons thereof.
- V. In order to ensure that this important matter is not trivialized, any complaint, which, in the opinion of the Committee, is deliberately false or frivolous would be viewed very seriously.
- VI. The Committee shall complete the Enquiry within a period of 14 working days from the date of commencement of Enquiry. Feedback would be provided with regard to outcome of the Enquiry within 10 working days of completion of the Enquiry. The exact nature of any disciplinary action taken against any person will remain confidential.

The Committee shall be governed by such rules as may be framed by Supreme Court Orders from time to time and by any other legislation that may be enacted on this subject from time to time.

Given the sensitive nature of cases of sexual harassment and their impact on the victim as well as the person against whom such allegations are leveled, K Raheja Corp is committed to maintaining confidentiality in relation to such complaints and the resultant Enquiry.

Document No	Policy Manual Revision No.	Issue Date	Page
CHRP-01	11	01 September 2016	3 of 4

To ensure all employees across locations are able to reach out to the committee as needed, committee members are identified from each of the sites/locations. Following is the list of committee members for each of the sites/locations respectively.

Division	Site/Location	Committee Member
Business Centre	Hyderabad	Rama Macedo Centre Head 09985309113
Business Centre	Vibgyor Towers	Nidhi Shah Centre Head 09819802423
Hotels	Sahar	Rajesh Shinde General Manager - Engineering 99207 51369
Matrix	Malad	Biswajit Dasgupta Complex Head 09619630892
Matrix	Airoli	Karan Datta Complex Head 7506785524
Real Estate	Ahmedabad	Pankaj Kotak General Manager - Business Development (Gujarat) 09825085157
Real Estate	Airoli	Pramod Mhamane General Manager - Engineering 9167640612
Real Estate	Bengaluru	N. Krishnamohan Vice President - Engineering 9886087730
Real Estate	Chennai	Ramakrishnan Sankaran Senior Vice President - Operations (Tamil Nadu) 09884096768
Real Estate	Gigaplex	Mayur Gajaria Associate Vice President - Engineering 9833923466
Real Estate	Goa	Rahul Sardesai Assistant General Manager - Architecture 09923599155
Real Estate	Herdilia	Pramod Mhamane General Manager - Engineering 9167640612

Document No	Policy Manual Revision No.	Issue Date	Page
CH RPM-01	11	01 September 2016	4 of 4

Division	Site/Location	Committee Member
Real Estate	Hindustan Mills	Manish Kothari General Manager - Engineering 09820880060
Real Estate	Hyderabad	Shrawan Kumar Gone Director - Operations (Andhra Pradesh & Telangana) 08142990111
Real Estate	Metal Box	Vijay Deshpande Vice President - Projects 09967400793
Real Estate	Powai	Nitin Bhuta Vice President - Engineering 9820880055
Real Estate	Pune	Anil Mathur Senior Vice President - Operations (Pune) 9923750044
Shopping Malls	Baroda	Rajat Bhargava General Manager - Operations 09879517585
Shopping Malls	Bengaluru	Rajat Bhargava General Manager - Operations 09879517585
Shopping Malls	Hyderabad	Vijay Bhatia Centre Head 07799006010
Shopping Malls	Malad	Vinay Menon Associate Vice President - Operations 9923948680
Shopping Malls	Pune	Virendra Singh Thakur Deputy General Manager - Operations 09980779745
Shopping Malls	Vashi	Sanjay Kumar Das Centre Head 09819906540

6. AMENDMENT

The Company reserves the right to amend or modify this policy in whole or in part, at any time without assigning any reason whatsoever.

