



PREVENTION OF SEXUAL HARASSMENT POLICY

WINDSOR SPECIALTY SERVICES
PVT. LTD.
2025

For Windsor Specialty Services Pvt. Ltd.


(Authorised Signatory)

Windsor Specialty Services Pvt. Ltd.

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POLICY ON PREVENTION, PROHIBITION AND REDRESSAL OF SEXUAL HARASSMENT AT WORKPLACE OF WINDSOR SPECIALTY SERVICES PVT LTD

Introduction :

We Windsor Specialty Services Pvt Ltd, a private Limited Company registered under the provisions of the Companies Act, 1956 including any amendment thereto presently having registered office at C-144 Sarvodaya Enclave, New Delhi 110017 hereafter referred to as the Company and as per the recommendation of the Committee constituted under the Sexual Harassment at Workplace (Prevention, Prohibition and Redressal) Act, 2013, have adopted the following policy:

1 Policy Statement

- 1.1 Windsor respects the dignity of its employees and aims to provide to its employees a working environment that is safe and secure and free from any form of Harassment. No Windsor employee, applicant, trainee or agency staff shall be subjected to any kind of discrimination and harassment on the grounds of race, gender, national origin, disability, marital status, pregnancy, sexual orientation, religion, age, etc.

Sexual harassment at workplace is a grave offence and Windsor has “zero tolerance” policy towards it.

- 1.2 All directors, management and employees of the Company have a responsibility to prevent or deter the commission of acts of sexual harassment in the Company's Workplace. Sexual harassment occurring in the workplace or in any other settings in which they may find themselves in connection with their employment is against the law and will not be tolerated by the Company. Any act of sexual harassment will invite serious disciplinary action.

- 1.3 Addendum: Zero tolerance for harassment and bullying

In addition to the provisions outlined under the Prevention of Sexual Harassment (POSH) Policy, the company adopts a zero-tolerance stance against all forms of harassment and bullying in the workplace. This includes, but is not limited to:

- Verbal, physical, or psychological harassment.
- Bullying, intimidation, or behavior intended to demean, threaten, or isolate any employee.

Any conduct that creates a hostile, unsafe, or discriminatory work environment. Any act, gesture or use words falling under the purview of the above description will not be tolerated and the Company will take necessary and proportionate

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disciplinary actions against persons found to be engaging in such behavior, following a thorough, impartial, and verified investigation process.

2.1 The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (the “Act”) (hereinafter referred to as “the Act”) notified by Ministry of Law and Justice, dated 23rd April, 2013 is brought into law by the government as to formulate effective measures to check the evil of sexual harassment at all workplaces. The Act defines sexual harassment and specifies the duties of the employer in this regard and provides the manner and procedure for prevention, prohibition and redressal of incidence of sexual harassment of women at workplace.

2.2 The Rules as notified by Ministry of Women and Child Development, dated 9th December, in support of above the Act are known as ‘Sexual Harassment of Women at workplace (Prevention, Prohibition and Redressal) Rules, 2013’ (hereinafter referred to as “the Rules”).

3 Scope of Policy

This policy against sexual harassment has been formulated keeping in view the provisions under “The Sexual Harassment of Women at Workplace (Prevention, Prohibition & Redressal) Act, 2013” and its Rules. It aims to supplement the complaint mechanism and relief as provided under the said act and under no circumstances should be deemed as alternative to the said Act.

The said policy is to define the guidelines and the process to be followed in order to provide protection against sexual harassment at workplace and for the prevention and redressal of complaints of sexual harassment in addition to the matters connected therewith or incidental thereto. For any doubt or further clarification, reference be made to the The Sexual Harassment of Women at Workplace (Prevention, Prohibition & Redressal) Act and its Rules.

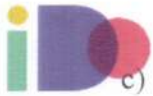
The Company is committed to ensure that sexual harassment instances are reported without any fear of reprisal and retaliation. The Company will investigate instances and/ or complaints of sexual harassment promptly and discreetly. The disciplinary actions will be initiated by the company in accordance with the provisions of this policy.

Objectives of this policy are:

- a) Promote a workplace based on equality and dignity.
- b) Provide a safe and congenial work environment.

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c) Prevent sexual harassment.

d) Awareness & sensitization about sexual harassment at the workplace.

e) Define the implications and outcome of sexual harassment.

f) Provide a fair mechanism for resolution, settlement or prosecution of complaint of sexual harassment at the workplace.

g) Ensure protection against retaliation to complainants, witnesses, committee members and other employees involved in prevention and complaint resolution.

4 Applicability

This Policy applies to a person employed at a workplace for any work on;

4.1 Regular, Temporary or Ad-Hoc basis

4.2 Directly or through an Agent/Contractor

4.3 With or without knowledge of principal employer

4.4 With or without remuneration/voluntary

4.5 Express/Implied terms of employment

4.6 Includes co-worker/ Contract worker /Probationer/Trainee/Apprentice.

5 Effective Date

This Policy extends to all employees of the Company and is deemed to be incorporated in the service conditions of all employees and comes into effect from year FY 2016-2017

6 Definitions

In this Policy document, unless there is anything repugnant to the subject or context thereof, the words and expressions as stated below shall have the following meanings:-

6.1 Sexual harassment– means and includes any of the following:

- i. physical contact and advances; or
- ii. a demand or request for sexual favours; or
- iii. making sexually colored remarks; or

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- iv. showing pornography; or
- v. any other unwelcome physical, verbal or non-verbal of sexual nature.
- vi. 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:
 - a. implied or explicit promise of preferential treatment in his/ her employment;
 - b. implied or explicit threat of detrimental treatment in his/ her employment;
 - c. implied or explicit threat about his/ her present or future employment status;
 - d. interference with his/ her work or creating an intimidating or offensive or hostile work environment for him/her;
 - e. humiliating treatment likely to affect his/ her health or safety.

6.2 Workplace – includes all departments, offices, branches and workshops, establishment of the Company located anywhere in India. It also includes any place visited by the employees arising out of or during the course of employment including transportation provided by the Management of the establishment for undertaking the journey.

6.3 Employee – includes any person on the rolls of the Company including those on deputation, contract, temporary, part time or working as consultants.

6.4 Management – Management includes the person on Board, HR Head, Sustainability Auditor, Security In Charge responsible or any other person authorised by the Board for formulation and administration of such policies for Windsor.

6.5 Aggrieved Person – in relation to workplace, any person of any age whether employed or not, who alleges to have been subjected to any act of sexual harassment (specified under clause 6.1) by the respondent at any place covered within the meaning of workplace.

6.6 Respondent Employee – refers to any employee against whom the complaint for sexual harassment has been made by the aggrieved person.

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6.7 Internal Committee – Internal Committee (hereinafter called IC) is constituted in accordance with section 4 of the Act to deal with complaints of sexual harassment.

7 Internal Committee

7.1 As per the provisions of the Act, the “Internal Committee” shall consist of a **Presiding officer** who shall be a woman employed at a senior level at workplace from amongst the employees, at least **two members** from amongst employees who are committed to the cause of women or having experience in social work or legal knowledge and **one member** from amongst non-govt. organization (NGO) committed to the cause of women.

Provided that at least one-half of the total members so nominated shall be women. The tenure of the committee shall be 3 years & names of the committee members and any change thereof shall be informed by e-mail or announced or displayed at work place from time to time by the management/HR

7.2 In reference with the above clause 7.1, a Committee has been constituted by the Management to consider and redress the complaints related to Sexual Harassment. The detail about the presiding officer and members of the Committee is provided in “**Annexure A**”.

7.3 A quorum for IC meeting shall be one half of total IC members (including the presiding officer of the IC). No meeting of IC shall be preceded without the presence of member as appointed as the IC External Member whether physical or through video conferencing. Any fraction shall be counted to next higher number.

The meeting of IC shall be held whenever any complaint on sexual harassment is received by the member of the Committee or the Committee and half yearly and as and when required for the purpose of implementation of the policy and monitoring the progress done till date.

8 Complaint Procedure

8.1 The Aggrieved person can approach IC with a written complaint within the period of 3 months from the date of last incident. Complaint should at the minimum be specific as to:

- i. nature of Sexual Harassment
- ii. date, time and place of incident(s)
- iii. identity of the person/s who is/are involved in the act of sexual harassment
- iv. witnesses present, if any

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- v. facts and circumstances in support of the complaint.

8.2 IC may extend the time limit not exceeding three months by recording the reasons in writing for delay, if it is satisfied that the circumstances were such that prevented the aggrieved person from filing the complaint during the period.

8.3 In case aggrieved person is unable to make the complaint for any reason, a complaint may be filed the following persons with his/her explicit consent:

- i. his/her relative or friend; or
- ii. his/her co-worker; or
- iii. an officer of the National Commission for women or state Women's Commission; or
- iv. any person who has knowledge of the incident, with the written consent of the aggrieved person.

8.4 In case the aggrieved person is dead, the complaint may be filed by either by his/her legal heir or any person with the written consent of the said legal heir.

8.5 Six copies of complaint along with supporting documents and the names and addresses of the witnesses.

8.6 IC will investigate the complaint in a prompt and expeditious manner.

8.7 The Committee and its members ensure to maintain the dignity and confidentiality of the complainant aggrieved person. IC do not function like a criminal court hence it will ensure not to insist on detailed description of harassment to protect the aggrieved person from further mental trauma. It will also ensure to maintain all the data related to sexual harassment cases in the company.

9 Conciliation

9.1 The IC before initiating any inquiry under the clause 8.7 above, and at the request of the aggrieved person may take steps to settle the matter through conciliation.

9.2 This will be done through process of separate and joint meetings.

9.3 No monetary settlement shall be made as a basis of conciliation.

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9.4 Where the settlement is arrived at between the parties to the case, IC shall record the settlement and forward the closure report to the employer to take action as specified in the recommendation. Copies of settlement shall be provided to the complainant and respondent. Thereafter, no further inquiry shall be conducted by IC in that case.

9.5 If any of the terms mentioned in the settlement are not complied with, the IC shall proceed to impose such disciplinary action as it deems fit.

10 Relief during pendency of inquiry

10.1 During the pendency of the enquiry, on a written request by the aggrieved person following relief may be provided to the aggrieved person-

- i. transfer the aggrieved person or the respondent to any other workplace; or
- ii. grant leave to the aggrieved person up to a period of three months; or

10.2 Other relief during pendency of inquiry-

- i. restrain respondent from reporting on the work performance of the aggrieved person or writing his/ her confidential report, and assign the same to another officer;
- ii. restrain the respondent from supervising any work of the aggrieved person.

11 Inquiry into complaint

11.1 The IC will adhere to the principles of natural justice in the course of investigating a complaint of sexual harassment. It shall ensure that the confidentiality of the Complainant, the witness and / or the information provided by them is maintained at all times to the extent reasonably practicable. The particulars of the complaint, investigation conducted by the Committee, proceedings of the case etc. shall be duly documented by the IC.

11.2 On receipt of formal complaint, the Committee shall send one of such copies to the respondent within seven working days to file his/ her written statement within such time not exceeding than ten working day from the receipt of the copy of complaint from the Committee.

11.3 The aggrieved person shall be provided with a copy of the written statement submitted by respondent.

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11.4 No legal practitioner shall be allowed to represent the parties in their case at any stage of the proceedings before IC. Both the parties will be given equal opportunity of being heard.

11.5 If the complainant or respondent fails without sufficient cause, to present herself/ himself for three consecutive hearings convened by the IC, it shall have the right to terminate the inquiry or to give an ex-parte decision on the complaint, as the case may be by giving a notice in writing, fifteen day in advance to the party.

11.6 For the purpose of making an inquiry, the IC shall have same powers as are vested in a civil court under CPC, 1908 in respect of summon/enforcing such information in form of the written communication, document and witnesses.

11.7 The inquiry will be completed within 90 days of receipt of the complaint.

11.8 On completion of the inquiry, the final report should be sent to the Employer within 10 days from the date of inquiry completion.

11.9 The action upon the recommendations mentioned in the report will be taken by the employer within 60 days of receipt of the same from the IC.

12 Recommendations/decisions of the IC

Except where the service rules exist, where Committee arrives at the conclusion that allegations against the respondent has been proved, it shall recommend the employer to take any of the following disciplinary actions on the basis of severity of harassment and its impact on the aggrieved person –

- a. a written apology,
- b. warning,
- c. reprimand or censure,
- d. withholding of promotion,
- e. withholding of pay rise or increment,
- f. terminating the respondent from service, or
- g. consideration in annual performance appraisal
- h. undergoing a counseling session, or
- i. carrying out community services.

In case where the service rules exist, then the action for sexual harassment shall be treated as misconduct with the provisions of service rules applicable to the respondent.

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13 Appeal

In case the decision by the IC is not acceptable to the aggrieved person, then help can be sought from relevant social organizations such as the state Women's

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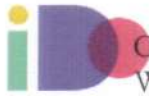
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Commission, Department of Women & Child Welfare or NGOs working on Women's Empowerment for legal aid and assistance.

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14 False or malicious complaints

Where the Internal complaint Committee arrives at a conclusion that the allegations against the respondent is malicious or the aggrieved person or any person making the complaint has made the complaint knowing it to be false or has produced any forged or misleading documents, it may recommend to the employer to take action against the complainant who has made the complaint in accordance with the provisions of the clause 12 of this policy above.

15 Confidentiality

Any disclosure, communication, publication or information to public and media in any manner, of the content of the complaint, and identity of the aggrieved person, respondent and witnesses, or any information related to conciliations, proceedings or recommendations by IC and action taken by management shall not be done and all such information shall be treated as confidential.

However, information may be disseminated regarding the justice secured to any victim of sexual harassment under this Act, without disclosing the identity of the victim.

If any person contravenes the provision of this clause, the management will take strict action against such person and may impose penalty also.

16 Management responsibility

Management endeavors to provide following mechanisms to strengthen the implementation of this Policy-

- i. Communication of policy to its employees and making it available on portal/ website of the Company for employees to refer.
- ii. Display at any conspicuous place in the workplace the constitution of Internal Committee.
- iii. Making it a part of the Corporate Induction. Organize workshops and awareness programs at regular intervals for sensitizing the employees with the provisions of this policy and orientation programs for IC Members.

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- iv. Provide necessary facilities to the IC for dealing with complaints and conducting inquiry.
- v. Assist in securing the attendance of respondent and witnesses before the IC proceedings as required.
- vi. Maintain all the documents related to sexual harassment cases in the company.
- vii. If in case required, initiate appropriate action in accordance with law, by forwarding the complaint to the police.
- viii. Provide assistance to the aggrieved person if she chooses to file complaint against the respondent in relation to the sexual harassment under the IPC or any other law for the time being in force.
- ix. Monitor the timely submissions of report by the IC.
- x. Inclusion of the number of cases reported and their resolution in the Annual Report of the Company.

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Constitution of "Internal Committee" (IC)

As per Company's policy on prevention, prohibition and redressal of sexual harassment at workplace, an "Internal Committee" has been constituted by the Management with reference to the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 to consider and redress the complaints related to Sexual Harassment. The Presiding Officer and Members of the Committee are as follows:

India Office

Sr. No.	Name	Role in Committee	Location	Function/Department	Contact detail/ IC Email ID
1	Shruti Sood	Presiding officer	New Delhi	Vice President – HR & Admin	shruti@windsorindia.com
2	Mira Saraf	Member	Mumbai	Executive Director	mira@windsorindia.com
3	Ashish Aggarwal	Member	Mumbai	Vice President – Technology	ashish@windsorindia.com
4	Masooma Ranalvi	External Member	Goa	Founder - WeSpeakOut	masooma@cetcindia.com

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