	<p><b><u>CONTROLLED DOCUMENT</u></b></p> <p><b>Human Resource Policy: Prevention of Personal Harassment at Workplace</b></p>	<p>Policy Number: HR/86 Policy Owner: Corporate HR Authorized by: Head - Corporate HR Access Level: 0 - 5</p>
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**Objective**

1. To provide a general definition of personal harassment.
2. To prohibit personal harassment and related retaliation.
3. To prohibit any unlawful activity.
4. To set out procedures to follow when an associate believes a violation of the policy has occurred.

**Applicability**

The policy is applicable to all associates, full time consultants, part time consultants, GETs, temporary associates, interns and apprentices of the company.

**Policy Guidelines**

The Company will not tolerate acts of personal harassment or relatedretaliation against or by any associate. It is intended that associates violating this policy shall be disciplined up to and including termination of services and taking legal recourse, if deemed necessary.

**1. Definitions**

**a. Personal Harassment**

The Company is committed to maintaining a positive learning and working environment. The Company does not discriminate on the basis of race, color, origin, sex, age, disability, creed or religion. Associates are expected not to discriminate with other associates on the above and any such behavior shall invite serious disciplinary action.


Personal harassment may include, **but is not limited to** the following:

- i. Use of foul language.
- ii. Derogatory remarks about a person’s appearance, geographical origin, race, language oraccent.
- iii. Display of explicit or offensive calendars, posters, pictures, drawings or cartoons which reflect negatively upon a person’s class.
- iv. Disrespectful comments even if unrelated to a person’s race, color, statehood, religion, age or disability.
- v. Teasing or references to an individual’s age or disability.
- vi. Victimization of an associate based on the above and/or personal bias/dislike.
- vii. Any defamatory and hurtful remarks that are deemed offensive.

**b. Workplace**

In addition to the place of work [head office / branch offices, etc.], workplace shall also include any place where the applicable associate visits in connection with his/her work, during the course of and/or arising out of employment/ contract/ engagement with Lodha, including transportation provided by Lodha for undertaking such a journey.

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**c. Complainant**

A Complainant is a person who is subject to alleged personal harassment.

**d. Respondent**

A Respondent is a person whose alleged conduct is the subject of a complaint.

**2. Constitution of Complaints Committee**

On receipt of any complaint pertaining to Personal Harassment, the Head of Corporate HR (HOC) along with Lead - Corporate HR (Employee Policy & HR Operations) & Head - Ethics & Culture shall jointly investigate Personal Harassment Complaints, and after concluding their investigations, submit recommendations to HoD-HR

Relevant action(s) shall be implemented, after securing internal alignment with HoD - HR.

Attempts shall be made to complete any investigation relating to Personal Harassment within 90 days of formally receiving the complaint and issue a formal email / report capturing the background of the case, course of investigation, investigation findings and recommended actions and act upon the recommendations within 30 days.


**3. Prohibition of Personal Harassment**

- a. It has to be understood by all concerned that the actual intent of personal harassment is irrelevant. What is relevant is the impact of the behavior on the recipient.
- b. Further, harassing behavior can be verbal, non-verbal, or physical. "Offensive" is in the eye of the beholder or the recipient of the behavior. What is NOT offensive to one person may be offensive to another, despite the intent of the alleged offender. Severe acts may be judged based on a single act. Less severe acts may constitute harassment if repeated.
- c. The Company shall ensure explicit protection of the confidentiality of the victim of Harassment, the alleged Respondent and the witnesses.
- d. The Company shall guarantee that neither Complainant nor witnesses will be subjected to retaliation.
- e. Lodha Group of Companies prohibits any form of Personal Harassment by any of its associates and shall take severe disciplinary action against any person/s found guilty of any such conduct/s.

**4. Complaint Redressal Mechanism:**

- a. Any aggrieved person may make, in writing, a complaint of personal harassment at workplace to either of the following role holders:-
  - (i) Head of Human Resources Department (HoD - HR) : Ms Janhavi Sukhtankar
  - (ii) Head of Corporate HR (HOC) : Mr Prince A Mishra
  - (iii) Head - Ethics & Culture : Mr Martin Godard

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- b. The complainant is expected to share details of the personal harassment meted out to her/him within a period of three (3) months from the date of incident and in case of a series of incidents, within a period of upto six (6) 3) months from the date of last incident

**5. False Accusations:**

If the Internal Complaints Committee comes to a conclusion that the allegation was made with malicious intent or the Complainant produced false or forged or misleading documents to prove his/hercase, the Internal Complaints Committee may recommend disciplinary action to be taken against the complainant.

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