



PREVENTION OF SEXUAL HARASSMENT POLICY (POSH)

1. POLICY

1.1 TRENT LIMITED is an equal employment opportunity company and is committed to creating a healthy working environment that enables all employees to work without fear of prejudice, gender bias and sexual harassment. The organization also believes that all employees within, have the right to be treated with dignity. Sexual harassment at the workplace or other than work place if involving employees is a grave offence and is, therefore, punishable.

1.2 The Parliament had enacted The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (the Act). The Act has directed companies to lay down guidelines and a forum for redressal of grievances related to sexual harassment.

2. SCOPE AND EFFECTIVE DATE

2.1 This Policy extends to all employees of Trent Limited and its subsidiaries- including those on deputation, contract, temporary, part time or working as trainees, apprentices and consultants and is deemed to be incorporated in the service conditions of all employees and comes into effect immediately.

2.2 Sexual harassment would mean and include any of the following:

- 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 any organizational activity;
- 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;
- Eve teasing, innuendos and taunts, physical confinement against one's will and likely to intrude upon one's privacy; and actions that are likely to intrude upon one's privacy;
- Sexually coloured 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;
- Conduct of such an act at workplace or outside the scope of workplace in relation to an employee of Trent, or vice versa during the course of employment; and any unwelcome gesture by an employee having sexual overtones

2.3 "Employee" means any person on the rolls of the Company including those on deputation, contract, temporary, part time, outsourced or working as consultants.

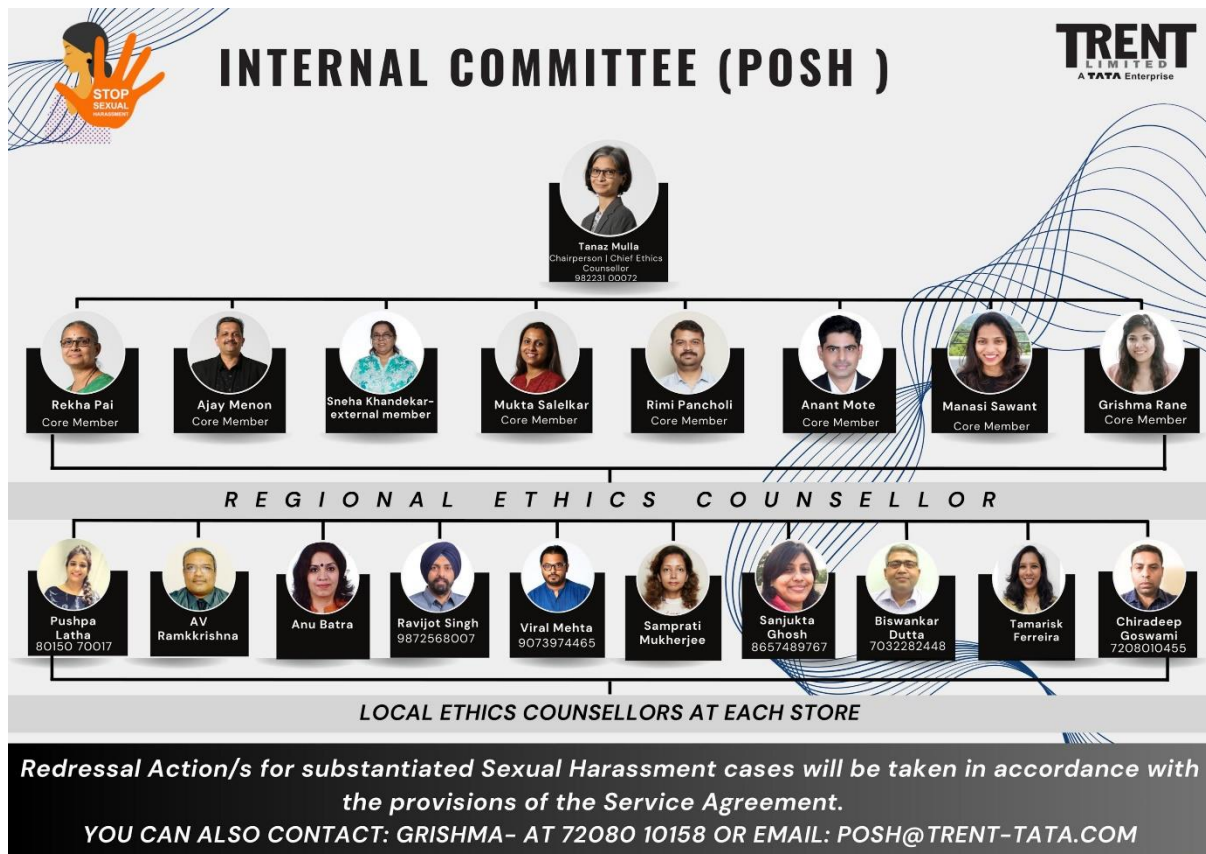
2.4 "Aggrieved Person" means any person employed for work whether for remuneration or not, including those on deputation, contract, temporary, part time or working as trainee, apprentice, consultant, client, customer, vendor, worker or by any other name called, who alleges that he/she may have been subjected to sexual harassment at workplace.

2.5 “Defendant” means any person against whom an allegation of sexual harassment has been made.

2.6 “Trent Limited Prevention of Sexual Harassment Committee” or “POSH Committee” means the committee constituted as per provision of the Act to serve as an internal redressal forum constituted by the company to address the prevention, prohibition and redressal of complaints related to Sexual Harassment at the Workplace.

3. TRENT LIMITED INTERNAL COMPLAINTS AND REDRESSAL COMMITTEE

3.1 A Committee has been constituted by the Management to consider and for the redressal of complaints of Sexual Harassment. The Chairman and Members of the Committee are as follows:



3.2 It shall be the duty of the Internal Complaints and the Redressal Committee constituted to promote and facilitate measures taken in the organization for the prevention of Sexual Harassment in the organization and for sensitization regarding the same, and to carry out an enquiry into the complaints of sexual harassment referred to it or brought to its notice within a stipulated time.

4. REDRESSAL POLICIES

4.1 A quorum of at least 3 members is required to be present for the proceedings to take place. The quorum shall include the Chairperson, at least two members, one of whom shall be a woman, a HR representative and a member from a non-governmental organization/association committed to the cause of women.

- 4.2 Any employee who feels and is being sexually harassed directly or indirectly may submit a complaint of the alleged incident to Trent's Internal Complaints and Redressal Committee in writing with his/her signature stating details of occurrence of incident.
- 4.3 The Committee will maintain a register to endorse the complaint received by it and keep the contents confidential.
- 4.4 The Committee will hold a meeting with the Complainant within five days of the receipt of the complaint, but no later than a week in any case.
- 4.5 At the first meeting, the Committee 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.
- 4.6 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 or her to give an explanation, whereafter, an "Enquiry" shall be conducted and concluded.
- 4.7 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 referred to the appropriate committee/forum in place after recording the reasons thereof.
- 4.8 In case the complaint is found to be false, the Complainant, if deemed fit, is liable for appropriate disciplinary action by the Management.

5. ENQUIRY PROCESS

- 5.1 The Committee shall immediately proceed with the Enquiry and communicate the same to the Complainant and person against whom complaint is made within a given time frame.
- 5.2 The Committee shall prepare and hand over the Statement of Allegation to the person against whom complaint is made and give him / her opportunity to submit a written explanation if she / he so desires within 7 days of receipt of the same.
- 5.3 The Complainant shall be provided with a copy of the written explanation submitted by the person against whom complaint is made.
- 5.4 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 witnesses that they propose to call.
- 5.5 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. The Committee shall call upon all witnesses mentioned by both the parties.
- 5.6 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.
- 5.7 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 MD. 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.

5.8 The Head HR will direct appropriate action in accordance with the recommendation proposed by the Committee and the MD.

5.9 The Committee shall be governed by such rules as may be framed by the Act and Rules framed thereunder and be guided by principles of natural justice.

6. OTHER POINTS TO BE CONSIDERED

6.1 The Committee may recommend action to the MD which may include transfer, appropriate punishment or any of the other appropriate disciplinary action.

6.2 The management shall provide all necessary assistance for the purpose of ensuring full, effective and speedy implementation of this policy.

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

6.4 The Committee shall analyze and put up report on all complaints of this nature at the end of the year for submission to the MD and all Sexual Harassment cases in a calendar year must be included within the ambit of an annual compliance report to the Ethics committee of the board.

6.5 The Report should include the following:

- Cases reported and disposed along with the time frame
- Details of workshops and awareness programmes against sexual harassment carried out
- Nature of action taken by the employer
- Process/ policy improvements, if any

6.6 In case of offences cognizable under the Indian Penal Code, then the complainant may choose to file a police complaint. The Management shall provide guidance and advice for making a Police Complaint. If a separate Police complaint has been filed, reference thereof shall be made by the Committee in its report.

❖ WHO YOU SHOULD CONTACT

For POSH related complaints / queries:

Tanaz Mulla – POSH Committee Chairman

Tanaz.mulla@trent-tata.com / posh@trent-tata.com

022 67008567 / 9223100072

❖ FREQUENTLY ASKED QUESTIONS

1. What are the objectives of the said Act?

This Act is to provide protection against sexual harassment of women at workplace and to provide redressal of complaints of sexual harassment.

2. Is Trent's POSH Policy gender neutral?

Trent's Policy is gender neutral. Any gender can raise a complaint. Both genders are given a fair and just chance to explain their situation.

3. How are complaints managed?

The complainant – the victim sends the complaint in writing to posh@trent-tata.com within 3 months of the incident. The committee send a copy of the complaint and a notice to the accused seeking an explanation. This needs to be replied to by the respondent within 10 days of receipt of the notice along with any details of witness. The posh committee conducts an inquiry with the complainant; respondent and witness and arrives at findings and observations. Based on the severity of the case action toward the guilty is taken. Time frame is 3 months.

4. How will a complaint be done?

Any aggrieved employee may make in writing a complaint of sexual harassment at workplace to the Internal committee/ Local Committee within 3 months from the date of incident or the date of the last incident in case of a series of incidents. In case the woman cannot write, the Presiding officer/ any member of Internal Committee/ Chairperson/ any member of Local Committee shall render all reasonable assistance. The complaint has to be made in written.

5. Can the time limit of 3 months be extended?

The POSH committee can extend the time limit not exceeding another 3 months if it is satisfied that the circumstances were such which prevented the woman from filing the complaint within the said period.

6. Can someone else file the complaint under the Act?

If the aggrieved woman is unable to make a complaint on account of her physical or mental incapacity or death, her legal heirs or other such person as may be nominated may do so.

7. What is the maximum time in which the inquiry must be completed?

The ICC must conduct an inquiry which should be completed within a period of 90 days.

8. Which stakeholders are made privy to the content of complaint and inquiry proceedings?

The contents of the complaint, identity and address of the aggrieved woman, respondent and witness, information about inquiry proceedings, recommendations of the ICC or the LCC and the action taken by the employer or the District Officer shall not be published, communicated or made known to the public, press and media.

However, information may be disseminated regarding the justice secured to the victim of sexual harassment without disclosing the name, address, identity or any other particulars.

9. Should the aggrieved woman be an employee of Trent?

The aggrieved woman need not be an employee of Trent. The respondent (against whom the complaint has been alleged) has to be an employee of Trent.

10. Is the organization responsible in case the incident happens outside the office?

Workplace has been defined in the widest manner and it includes any place visited by the employee during the course of employment including transportation provided by the employer.

Reviewed on 7th February 2024