

POLICY ON PREVENTION OF SEXUAL HARASSMENT (POSH) AT WORKPLACE

PREVENTION OF SEXUAL HARASSMENT (POSH) AT WORKPLACE

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REVISION HISTORY

No	Date	Revision details
1.	13.08.2025	Constitution of Regional Committee for Redressal of Sexual Harassment (Regional ICC)
2.	13.08.2025	Constitution of Corporate Committee for Redressal of Sexual Harassment (Corporate ICC)

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SEXUAL HARASSMENT REDRESSAL POLICY

1. INTRODUCTION:

Apollo Sindoori Hotels Limited (Company) is an equal employment opportunity company and is committed to creating a healthy working environment that enables employees to work without fear of prejudice, gender bias and sexual harassment. The Company also believes that all employees 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 under relevant Laws of the country.

This Policy will be posted on the Company’s website at www.apollosindoori.com

2. OBJECTIVE:

The Management of Apollo Sindoori Hotels Limited recognizes that the offence of Sexual Harassment of employees during the course of employment to be a serious misconduct. It is the duty of the Management and all responsible persons representing the Management to prevent sexual harassment in the workplace and to provide a mechanism for resolution of such complaints. To meet this objective, measures shall be taken to avoid, eliminate, and if necessary, impose punishment for any act of sexual harassment, which includes unwelcome sexually determined behavior.

3. REGULATORY REQUIREMENT

This policy is in accordance with the provisions of “The Sexual Harassment of Women at Workplace (Prevention, Prohibition, and Redressal) Act, 2013”. POSH policy provides for protection against sexual harassment at the workplace, for the prevention and redressal of complaints of sexual harassment and to enforce strong disciplinary action in the event of any such incident.

This policy provides guidelines for prompt redressal of complaints related to sexual harassment and in compliance with The Sexual Harassment of Women at Workplace (Prevention, Prohibition, and Redressal) Act, 2013 (the “Act”).

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4. APPLICABILITY:

This Policy with regards to Prevention, Prohibition and Redressal of Sexual Harassment covers all employees across the Company and its subsidiaries. The Company encourages every employee who believes they are sexually harassed to use the redressal mechanism as provided in this policy.

The following are applicable for Redressal of sexual harassment at Apollo Sindoori Hotels Limited & its subsidiaries.

- a. It extends to all employees of the Company – permanent, temporary, contract employees and trainees.
- b. An alleged act(s) of sexual harassment, whether the incident has occurred during or beyond duty hours.
- c. An alleged act(s) of sexual harassment, whether sexual harassment has taken place within or outside the Company premises.
- d. It is not applicable when both the alleged harasser and the victim are third parties.

5. DEFINITIONS

- a) **“Aggrieved Person”** means a person in relation to workplace whether employed or not, who alleges to have been subject to any act of sexual harassment by the Respondent.
- b) **“Company”** means Apollo Sindoori Hotels Limited
- c) **“Employee”** means a person employed at a workplace for any work on regular, temporary, adhoc or daily wages basis, either directly or through an agent, including a 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;

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- d) **“Internal Committee”** means a committee constituted by Company as per this Policy.
- e) **“Respondent”** means a person against whom the aggrieved person has made a complaint.
- f) **“Subsidiary”** Subsidiaries of Company namely Sindoori Management Solutions Private Limited and Olive Plus Twist Avenues Private Limited
- g) **“Sexual Harassment”** is, any unwelcome sexually determined behavior, such as physical contact and advances; a demand or request for sexual favors: whether verbal, textual, graphic, and electronic or by any other actions. Harassment may be subtle, manipulative and not always evident. It does not refer to occasional compliments of a socially acceptable nature but to behavior that is not welcome and is personally offensive. All forms of gender harassment are covered. Offenders can be in any grade/level and covers non – employees such as customers/clients.

Sexual harassment would mean and include any of the following:

- a. Unwelcome sexual advances, requests or demand for sexual favors, either explicitly or implicitly, in return for employment, promotion, examination or evaluation of a person towards any company activity.
- b. Unwelcome sexual advances involving verbal, non-verbal, or physical conduct such as sexually colored 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 individual’s 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. Physical contact and advances in circumstances which result in a hostile work environment or discrimination or denial of service progression or benefits.
- d. Any obscene gesture by an employee having sexual overtones
- e. Misuse of official position or powers to solicit sexual favors
- f. Any other unwelcome physical, verbal or non-verbal conduct of sexual nature

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- g. The following are basic definitions for reference:
 - a. Complainant: The person reporting an incident of Sexual Harassment.
 - b. Victim: The person subjected to Sexual Harassment.
 - c. Alleged Harasser: The person who is alleged/reported to have committed an act of Sexual Harassment.

6. INTERPRETATION

Terms that have not been defined in this policy shall have the same meaning assigned to them in the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act 2013 as amended from time to time.

7. CORPORATE COMMITTEE FOR REDRESSAL OF SEXUAL HARASSMENT (CICC)

The Corporate Committee for Redressal of Sexual Harassment constituted by the Company (CICC) shall consist of:

- a. A woman employee employed at a senior level amongst the employees shall act as Presiding officer of the committee.
- b. Not less than 2 members from amongst employees preferably committed to the cause of women OR who have had experience in social work OR have legal knowledge.
- c. A representative from a NGO or associations committed to the cause of women or a person familiar with issues relating to Sexual Harassment.

To ensure confidentiality, dedicated e-mail ids icc@apollosindoori.com for ASHL, icc@sindoorisolutions.com for SMS and iccoliveplustwistavenues.com for OPTA has been created for employees, for sending sexual harassment related complaints. This e-mail id can be accessed only by members of the CICC.

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Corporate ICC is responsible for:

- Receiving complaints of sexual harassment at workplace
- Initiating and conducting enquiries as per established procedure
- Submitting reports of its findings
- Taking appropriate remedial measures to respond to any substantiated allegations of Sexual Harassment.
- Maintaining strict confidentiality as per the established procedure
- Discouraging and preventing employment-related sexual harassment.
- Any complaint that comes to the ICC will be dealt with appropriately, sensitively and confidentially in the most judicious and unbiased manner within certain defined time frame.

Where the Presiding Officer or any Member of the Corporate ICC:

- (a) contravenes the provisions of section 16; or
- (b) has been convicted for an offence or an inquiry into an offence under any law for that time being force is pending against him/ her or
- (c) has been found guilty in any disciplinary proceedings or a disciplinary proceeding is pending against him; or
- (d) has so abused his position as to render his continuance in office prejudicial to the public interest, such Presiding Officer or Member, as the case may be, shall be removed from the Committee and the vacancy so created or any casual vacancy shall be filled by fresh nomination in accordance with the provisions of section 4(5) of Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act 2013.

At least half the total members of each ICC shall be women. The Presiding Officer and every member of each ICC shall hold office for such period, not exceeding three years, from the date of their nomination as may be specified by the Company.

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Members of the Corporate ICC shall consist of:

Name	Role	Location	Email	Contact No.
Suresh N	Male Committee Member	Chennai	suresh@apollosindoori.com	+91 98407 03808
Lakshmi S	Female Committee Member	Chennai	lakshmi.s@apollosindoori.com	+91 97314 11772
Madhavi N A	Presiding Officer	Chennai	companysecretary@apollosindoori.com	+91 86670 31136
Selvakumaran C	Male Committee Member	Chennai	selvakumaran@apollosindoori.com	+91 74011 14609
Sukhpreet Kaur	External Member	Delhi	74preetisingh@gmail.com	+91 98737 98765

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8. APOLLO SINDOORI HOTELS LIMITED – INTERNAL COMPLAINTS COMMITTEE:

Every Unit should have an ICC against sexual harassment. It should consist of the following members:

- Unit / Regional Head
- Female employee representative
- Male employee representative
- Respective Unit / Regional HR

According to the broad guidelines mentioned above, each unit can nominate members for the committee. People with social work or legal background should be preferred as Committee members.

The Procedure for Redressal is as follows: Upon notification of a harassment complaint, an impartial investigation will be promptly commenced and will include direct investigations with involved parties and where necessary with employees who may be witnesses or have knowledge of matters relating to the complaint. The ICC will provide an opportunity for the victim as well as the alleged harasser to represent their position and provide their explanations. Depending on the nature of explanations given, the committee will initiate an enquiry into the allegation. The alleged harasser would be on suspension during the course of Redressal process.

The Redressal process is as follows:

- The Complainant/Victim registers his/her complaint through the official E mail ID mentioned.
- The ICC 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.
- The Committee members shall hear the Complainant and record his/her allegations. The Complainant can also submit any corroborative material with a documentary proof, oral or written material, etc., to substantiate his / her complaint. In any case of embarrassment of narration of event, a same gender committee member shall meet and record the statement.

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- The merits of the case will be tested by the Committee by carrying out a detailed investigation into the complaint by following the principles of natural justice.
- The solution will be communicated to the Complainant within fifteen days of receipt of the complaint.
- Once the solution is communicated, the committee members need to submit a detailed report to the Corporate ICC pertaining to the happenings of the investigation and the solution given to the Victim.

As per the Laws of the country, the Members of the Committee shall hold office for such period, not exceeding three years, from the date of their nomination as may be specified. Each Unit needs to fill in the above table and forward the same to Corporate ICC. Any change in the list of Committee members needs to be notified immediately to Corporate ICC.

9. REDRESSAL FROM CORPORATE COMMITTEE FOR REDRESSAL OF SEXUAL HARASSMENT

In the event an employee is not satisfied with the solution given by the Regional ICC, the complainant can approach the Corporate ICC formed under this policy.

- The Corporate ICC will conduct a thorough enquiry with Unit/Regional Head and the Complainant to understand the issues involved.
- An impartial solution will be given to the Complainant within thirty days of receipt of the harassment complaint by Corporate ICC. The decision made by the Corporate ICC will be final and binding on both the parties.

10. NOTIFICATION OF HARASSMENT:

- Any Apollo employee who believes he or she is being harassed, or any employee who becomes aware of harassment, should send an E-mail to icc@apollosindoori.com for ASHL (Apollo Sindoori Hotels Limited), icc@sindoorisolutions.com for SMS (Sindoori Management Solutions Private Limited) and icc@oliveplustwistavenues.com for OPTA (Olive Plus Twist Avenues Limited) which can be accessed by the Corporate Committee for Redressal of Sexual Harassment.

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b. When complaint is registered by the Complainant/Victim the following details need to be provided:

- i. Name & Address
- ii. Employee ID
- iii. Contact Number
- iv. Department

c. The Complainant/Victim must also provide the details of the incident together with name(s) or designation(s) of the self/victim(s) as available and of the alleged harasser(s). All such complaints will be treated with confidentiality and will be duly investigated and acted upon, if found to be true.

11. GENERAL CONDITIONS:

- a. In case the complaint is found to be false, the Complainant shall, if deemed fit, be liable for appropriate disciplinary action by the Management.
- b. 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.
- c. The policy also prohibits retaliation against any employee who brings an accusation of discrimination of sexual harassment or who assists with the investigation or resolution of sexual harassment.
- d. Complainants or witnesses will not be victimized or discriminated against while dealing with complaints.
- e. The aggrieved employee will be able to withdraw the complaint any time from the ICC after stating appropriate reasons for the same.
- f. Should any dispute or doubt arise as to the interpretation of these rules, it should be forwarded to Corporate HR Department, and the decision of the management shall be final.
- g. Wherein the aggrieved employee is unable to make a complaint on account of physical/mental incapacity or death or otherwise, his/her legal heir or such other person can register a complaint for the same purpose with the ICC.
- h. Any harassment by a client/customer on an employee or vice versa would be liable for legal proceedings, as per the Laws of the Country.

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- i. As a part of the policy, the aggrieved employee will be given counseling to help them cope with mental trauma arising out of the harassment.
- j. The ICC shall analyze and put up report on all complaints of this nature at the end of every year. The Management shall provide all necessary assistance for the purpose of ensuring full, effective and speedy implementation of this policy.

12. POWER TO MAKE RULES AND AMENDMENTS

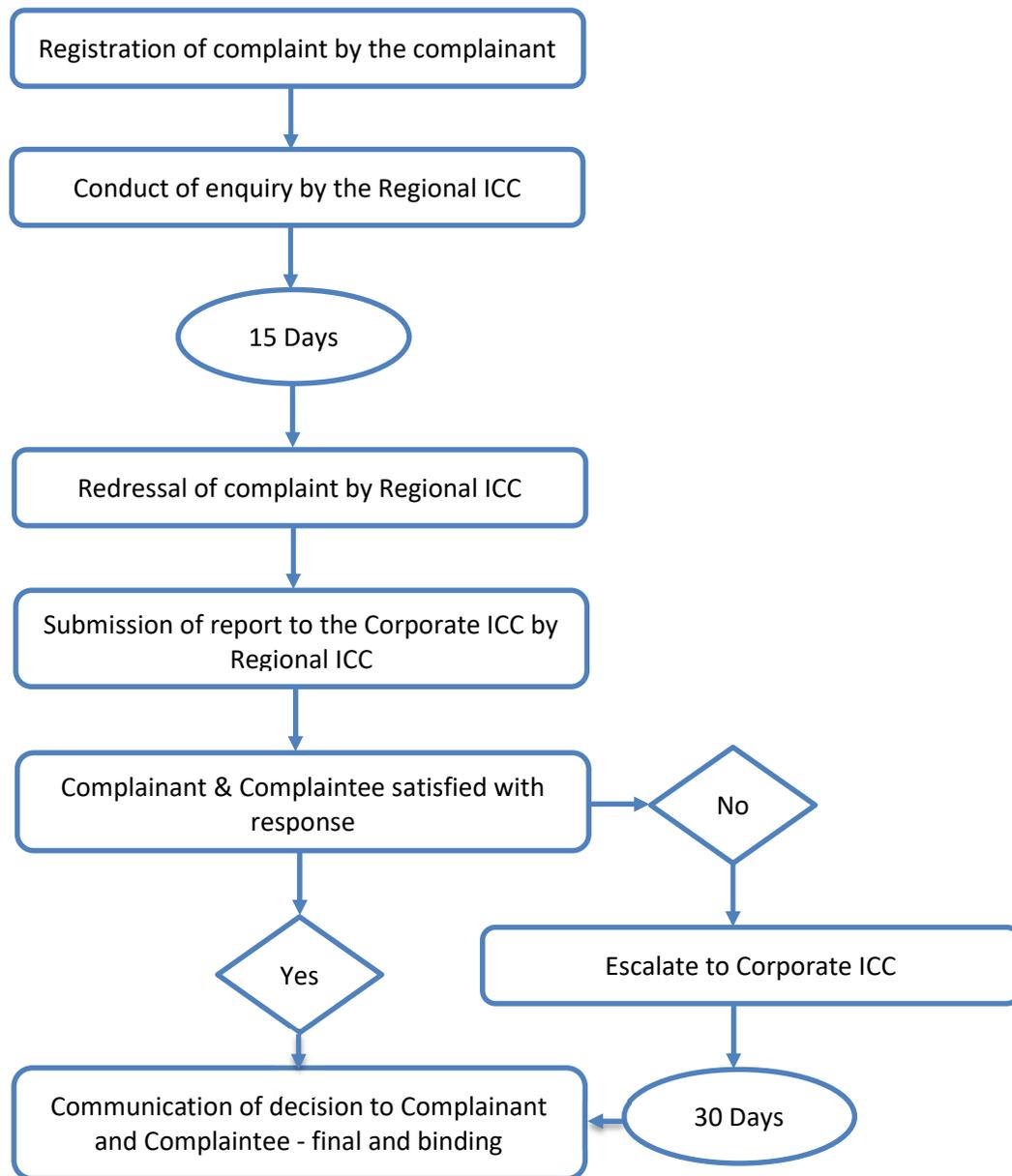
The power to make rules pertaining to sexual harassment at workplace vests with the Corporate HR department. Any changes to these rules shall be suitably communicated to all the employees.

13. ANNEXURE:

- a. Process Flow Chart
- b. Roles and Responsibilities of the following:
 - i. Committee Members
 - ii. HR Department

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ANNEXURE - PROCESS FLOW CHART



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14. ROLES AND RESPONSIBILITIES:

ROLES & RESPONSIBILITIES OF COMMITTEE MEMBERS

- The committee should notify the time and date of the meetings to be held, to the complainant /victim and the alleged harasser.
- Enquiry to be conducted in a neutral location which provides a conducive environment, for both the victim and the alleged harasser.
- Should maintain confidentiality during the whole course of investigation.
- Appropriate recordings of each enquiry are to be maintained.
- No members of the Redressal Committee should disclose any of the information about the employee to other staff in the hospital.
- The contents of the complaint, details of the alleged harasser, information, and reports of the committees should not be communicated, published or made known to the public, press and media despite the provision of Right to Information Act 2005.
- The Regional ICC at the request of the aggrieved person, before initiating the enquiry, can take steps to settle the matter through conciliation. However, it has been made clear that no monetary settlement should be made as basis of conciliation.

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ROLES & RESPONSIBILITIES OF HR DEPARTMENT:

- Conduct necessary communication and training across the hospital with respect to sexual harassment at the workplace.
- Ensure that the policy, procedures and the penal consequences is communicated and explained during Induction of all new joiners.
- Any act of sexual harassment to be notified as misconduct under the Code of Conduct Policy at workplace
- Provide sufficient protection for employees who work and transport in late shifts hours.
- Maintain records of all Sexual Harassment cases and findings.
- Clarify to employees on any queries related to this policy wherever required.
- Ensure that the solutions provided are of unbiased nature.
- Submission to Corporate ICC

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SEXUAL HARASSMENT IN THE WORK PLACE

कार्य स्थल पर यौन उत्पीड़न

Govt of India has enforced Sexual Harassment of women at workplace (Prevention, Prohibition and Redressal) Act, 2013 across the country. In order to ensure strict compliance, one must know what sexual harassment is. In general, the following acts amounts to "SEXUAL HARASSMENT".

भारत सरकार ने देश भर में कार्य स्थल पर महिलाओं के यौन उत्पीड़न (रोकथाम, निषेध और निवारण) अधिनियम, 2013 लागू किया है। इसका सख्त अनुपालन सुनिश्चित करने के लिए यह जानना चाहिए कि यौन उत्पीड़न क्या है। सामान्य तौर निम्नलिखित कार्य "यौन उत्पीड़न" हैं।

- Unwelcome touching
- Staring or leering
- Sexually explicit pictures or posters
- Unwanted invitations to go out on dates
- Request for sex
- Intrusive question about a person's private life or body
- Insults or taunts based on sex
- Sexually explicit physical contact, emails or SMS text message.

- अनचाहा स्पर्श;
- घूरना या कामुकता से देखना;
- कामुक चित्र या पोस्टर दिखाना;
- डेट पर बाहर जाने का अवांछित निमंत्रण;
- सेक्स के लिए अनुरोध;
- किसी व्यक्ति के निजी जीवन या शरीर के बारे में गहन प्रश्न;
- सेक्स आधारित अपमान या ताने;
- शारीरिक कामुक संपर्क, ईमेल या टेक्स्ट संदेश एसएमएस करना.

Examples: VERBAL HARASSMENT

- Referring to an adult as a girl, hunk, doll, babe, or honey
- Whistling at someone, cat calls
- Making Sexual comments about a person's body
- Turning work, discussions to sexual topics
- Telling sexual jokes or stories
- Asking personal questions about social or sexual life
- Making sexual comments about a person's clothing, anatomy, or looks
- Telling lies or spreading rumors about a person's personal sex life

उदाहरण: ज़बानी उत्पीड़न

- एक बयस्क का जिक्र लड़की, कामी पुरुष, गुड़िया, बेब या हनी के रूप में करना
- किसी पर सीटी मारना, सीटी बजाना
- किसी व्यक्ति के शरीर के बारे में यौन टिप्पणी करना
- कार्य, बहस को यौन विषयों पर ले जाना
- यौन चुटकुले या कहानियां बताना
- सामाजिक या यौन जीवन के बारे में व्यक्तिगत प्रश्न पूछना
- किसी व्यक्ति के कपड़ों, शरीर रचना या दिखने के बारे में यौन टिप्पणी करना
- किसी व्यक्ति के निजी जीवन के बारे में झूठ या अफवाह फैलाना

NON – VERBAL HARASSMENT

- Looking a person up and down (Elevator eyes)
- Staring at someone
- Blocking a person's path
- Following the person
- Uninvited personal gifts
- Displaying sexually suggestive visuals
- Making Sexual gestures with hands or through body movements
- Making facial expressions such as winking, throwing kisses, licking lips

गैर ज़बानी उत्पीड़न

- किसी व्यक्ति को ऊपर से नीचे देखना (आंखें फाड़कर)
- किसी को घूरना
- किसी का मार्ग रोकना
- व्यक्ति का पीछा करना
- अन आमंत्रित व्यक्तिगत उपहार
- यौनोत्तेजक दृश्य दर्शाना
- हाथों या शारीरिक गतिविधियों के जरिए यौनिक संकेत करना
- चेहरे के भाव बनाना जैसे आंख मारना, हवा में बुम्बन, होंठ चाटना

PHYSICAL HARASSMENT

- Giving a massage around neck or shoulders
- Touching the person's clothing, hair, or body
- Hugging, kissing, patting or stroking
- Standing close or brushing up against another person

शारीरिक उत्पीड़न

- गर्दन या कंधों के चारों ओर रगड़ना
- व्यक्ति के कपड़े, बाल या शरीर को छूना
- गले लगाना, न्यूनना, सहलाना या थपथपाना
- किसी व्यक्ति के पास खड़े होना या शरीर से शरीर रगड़ना

Under the Act, all are required to prevent themselves from the above activities and ensure no indulge in any of the above unlawful activities.

इस अधिनियम के तहत, सभी को उपरोक्त गतिविधियों से खुद को रोकने और उपरोक्त गैरकानूनी गतिविधियों में से किसी में लिप्तता न होना सुनिश्चित करने की आवश्यकता है।

Any violation of this act at Apollo Sindoori Hotels Limited should be reported immediately to Ms. N A Madhavi, Company Secretary Mob: 7401114615. In total 100%

अपोलो सिंदूरी होटल्स लिमिटेड में इस अधिनियम के किसी भी उल्लंघन की सूचना तुरंत सुश्री एन ए माधवी, कंपनी सचिव मोबाइल: 7401114615 को दी जानी चाहिए। कुल 100%