

QRG Investments and Holdings Limited

POSH Policy

Version 2.0

Internal



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Document Control

S No	Type of Information	Document Data
1.	Document Title	QRG Investments and Holdings Limited POSH Policy
2.	Document Code	QRGIHLPOSHP
3.	Date of Release	October 22, 2022
4.	Document Superseded	
5.	Document Approvers	Board of Directors

Document Change Approvals

Version No.	Revision Date	Nature of Change	Date Approved
1.0	NA	Initial Version	October 22, 2022
2.0	November 06, 2024	As no. of employees increased more than 10. Hence, Internal Complaints Committee formed and updated accordingly.	November 06, 2024

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1. Objective

The QRG Investments and Holdings Limited (QRGIHL) POSH Policy seeks to create and maintain a safe work environment, free from sexual harassment and discrimination for all employees in accordance with the guidelines of “The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013.” The policy also outlines the process to be followed when an employee believes that a violation of the policy has occurred.

2. Statement of Commitment

QRGIHL is committed to provide a workplace in which the dignity of every individual is respected. All the QRG Investments and Holdings Limited employees are entitled to respectful treatment in the workplace. Being respected means being treated honestly and professionally, with one’s unique talents and perspectives valued. A respectful workplace is about more than compliance with the law. It is a hostile free working environment that is free of inappropriate behavior of all kinds and harassment because of age, disability, marital status, race or color, national origin, religion, sex, sexual orientation or gender identity. As part of this commitment the “POSH Policy” has been formulated.

The objective of such a policy is to provide a streamlined, positive and uniform way of dealing with cases of harassment. It aims to make all employees aware of the preventive measures and forewarns them to detest from undue actions.

Each employee should understand that incidents of harassment and inappropriate behavior will not be tolerated at the QRG Investments and Holdings Limited.

3. Scope

This Policy applies to all the employees, workers and trainees (whether in the office premises or outside while on assignment) of QRG Investments and Holdings Limited (herein after referred to as the Company).

Where sexual harassment occurs to an employee, the Company will take all necessary and reasonable steps to assist the affected person in terms of support and preventive action.

4. Definitions

“Act” means The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 read with relevant rules made there under or any amendments or modifications thereof.

"Aggrieved person" in relation to a workplace means a person, of any age, who alleges to have been subjected to any act of sexual harassment by the respondent.

“Complainant” means, in relation to a workplace, a man or a woman, of any age whether

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employed or not, who alleges to have been subjected to any act of sexual harassment by the respondent.

"Employee" means a person employed at a workplace for any work on regular, temporary, ad hoc or daily wage 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.

"Employer" means in relation to any department, organisation, undertaking, establishment, enterprise, institution, office, branch or unit, the head of that department, organisation, undertaking, establishment, enterprise, institution, office, branch or unit or such other officer as the appropriate Government or the local authority, as the case may be, may by an order specify in this behalf.

"Respondent" means an employee against whom the complainant has made a complaint of sexual harassment.

"Sexual harassment" refers to sexual advances, request or demand for sexual favours, sexual connotation, showing pornography and other verbal or physical conduct of a sexual nature. Sexually harassing conduct may be verbal, visual, or physical in nature. Offensive or intimidating behaviour may also include use of sexually oriented comments, posters, e-mails and jokes, especially when they contribute to a hostile or offensive working environment.

"Workplace" refers to and includes QRG IHL offices as well as the premises of other third parties, vendors and contractors of QRG IHL where the employee works. It includes premises visited by employees arising out of or during the course of employment and includes transportation provided by QRG IHL for the purpose of commuting to and from place of employment.

"Behaviour amounting to sexual harassment" The following circumstances, among others, if they occur, or are present in relation to or connected with any act or behaviour of sexual harassment may amount to sexual harassment:

- i. Implied or explicit promise of preferential treatment or threat of detrimental treatment in the complainant's employment.
- ii. Implied or explicit threat about the complainant's present or future employment status; or
- iii. Interference with the complainant's work or creating an intimidating or offensive or hostile work environment for the complainant; or
- iv. Humiliating treatment likely to affect the complainant's health or safety.

5. Responsibilities of Employees

Dos

- Know your rights. Sexual harassment is illegal.
- Treat others with respect and dignity
- Refrain from actions that may offend, embarrass or humiliate others (whether deliberate or unintentional)
- Speak up. If you can, tell the person to stop. State clearly and firmly that you want a particular behaviour to cease.
- Get information and support. If you feel you cannot speak up, ask your colleague to help you.
- Bring it to the notice of the local committee. The colleague may also bring it to the notice of the local committee. Keep records/evidence that might be useful for pursuing the case.

Don'ts

- Do not blame yourself. Sexual harassment is not something one brings on oneself. It is not a consequence of certain ways of dressing or acting. It is a violation of an individual's right to work and live with dignity.
- Do not ignore it. Ignoring sexual harassment does not make it go away. The harasser may misinterpret a lack of response as approval of the behaviour.
- Do not delay. Delay in action increases the probability that unwanted behaviour will continue or escalate.
- Do not hesitate to ask for help. Speaking up may prevent others from being harmed as well.

6. Internal Complaints Committee

A Complaints Committee has been formed to deal with cases of sexual harassment. This Committee will comprise of the following members namely:

- Ms. Bhavna Chugh, acting as the Chairperson
- Ms. Lata Krishnan, as Member
- Ms. Roma Arora, as Member
- Ms. Aashi Pancholi, as Member
- Mr. Narender Choudhary, as Member

Every Member of the Internal Complaints Committee shall hold office maximum for a period of three years, from the date of their nomination after which their office shall be filled up by the Whole Time Director (WTD).

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Any casual vacancy arising in the constitution of Committee i.e. if any of the members ceases to hold office upon ceasing to be an employee due to resignation, termination of employment or death, the same shall be filled up by the WTD.

Disqualification of Chairperson and members

- A person shall be disqualified for being appointed, elected, nominated or designated or continue as a member, if there is any complaint concerning sexual harassment pending against him/ her or if he/ she is found guilty of sexual harassment.
- The Chairperson/members shall be disqualified from serving on the Committee if he/she shows bias towards any party and the decision of the WTD shall be final in ascertaining the biasness.

The quorum for any meeting of the Committee will be **three** members including at least 2 female members.

The Complaints Committee will make an annual report to the Audit Committee of the Board of Directors of the Company on the complaints received and action taken by them during the financial year.

7. Reporting Requirements

If you are being harassed:

- Tell the accused that his behaviour is unwelcome and ask him to stop.
- Keep a record of incidents (dates, times, locations, possible witness, what happened, your response). It is not mandatory to have a record of events to file a complaint, but a record can strengthen your case and help you remember the details over time, in case the complaint is not filed immediately.
- If, after asking the accused to stop his behaviour, the harassment continues, report the abuse to **the Internal Complaints Committee** formed for this purpose and file a complaint as soon as possible. You may also email your complaint at POSH@QRGIHL.COM created especially for this purpose.

7.1 Third Party Harassment

In case of third party sexual harassment, the Company will assist and provide all its resources to the complainant in pursuing the complaint and ensure her safety at least in its premises.

8. Complaint Procedure and Guidelines

- The victim will have a right to lodge a complaint concerning sexual harassment against an accused with the Internal Complaints Committee, within a period of three months from the date of incident and in case of a series of incidents, within a period of three months from the date of last incident.
Provided further that the Committee may, for the reasons to be recorded in writing, extend the time limit not exceeding three months, if it is satisfied that the circumstances were such which prevented the person from filing a complaint within the said period.
- Such a complaint shall preferably be in writing; if the complaint is oral the same shall be reduced in writing.
- The complainant will be given full confidentiality at this stage.

9. Inquiry and Investigation

- The Chairperson, or in her absence, any Member, shall convene a meeting of the Committee immediately on receipt of a complaint preferably within **5 days**, but in no case later than a week.
- At the first meeting, the complainant will be required to be present; the Committee shall hear the complaint and decide whether a prima facie case is made. If not, the matter will be closed there itself.
- If the case proceeds further, the Committee shall inform the person accused that a complaint has been filed against him and demand from him a written explanation within **7 days** of date of issue of notice to him.
- If the complainant or the accused desires to examine any witnesses, she shall communicate in writing to the Chairperson the names of witnesses whom she proposes to so examine.
- The Committee shall ensure that the rule of natural justice is followed and both parties are given reasonable opportunity to be heard and to present their side of the story. Both the complainant and the alleged accused will be questioned separately with a view to ascertain the veracity of their contentions. If required, the person who has been named as a witness will need to provide the necessary information to assist in resolving the matter satisfactorily.
- The investigation shall ordinarily be completed within a period of **3 months** from the date of lodgement of complaint with the Committee, in accordance with the service rules of the Company.
- The findings of the Committee shall thereafter be forwarded to the WTD who shall implement the same by issuing necessary orders within 10 days of the

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date of receipt of decision of the Committee.

10. Complaints Made with a Malicious Intent

This policy has been evolved as a tool to ensure that in the interest of justice and fair play, employees have a forum to approach in the event of instances of sexual harassment. However, if on investigation it is revealed that the complaint was made with a malicious intent and with the motive of maligning the concerned individual/ tarnishing his image in the Company and to settle personal/ professional scores, strict action will be taken against the complainant.

Provided that a mere inability to substantiate a complaint or provide adequate proof shall not be a case for attracting action against the complainant under this section.

11. Action During Pendency of Inquiry

During the pendency of an inquiry, on a written request made by the aggrieved person, the Internal Committee may recommend to the employer to—

- (a) transfer the aggrieved person or the respondent to any other workplace; or
- (b) grant leave to the aggrieved person upto a period of three months; or
- (c) grant such other relief to the aggrieved person as may be prescribed.

The leave granted to the aggrieved person under this section shall be in addition to the leave she would be otherwise entitled.

12. Conciliation Process

The Internal Committee may, before initiating inquiry and at the request of the aggrieved person take steps to settle the matter between her and the respondent through conciliation.

Where a settlement has been arrived at, the Internal Committee shall record the settlement so arrived and forward the same to the employer to take action as specified in the recommendation.

The Internal Committee shall provide the copies of the settlement as recorded to the aggrieved person and the respondent.

Where a settlement is arrived at no further inquiry shall be conducted by the Internal Committee.

13. Disciplinary Action

Any person found guilty of sexual harassment shall be liable to be punished and shall be liable for any of the following depending upon the graveness of the matter:

- Warning or reprimand
- Withholding of increment
- Reduction in rank
- Termination of service

The employees who are victims of sexual harassment, may, in addition to the above, seek legal remedies as may be provided under various laws for the time being in force.

14. Disclaimer

QRGIHL reserves the right to amend the policy from time to time in order to comply with any laws/ rules/regulations or any other changes related to sexual harassment that may come into effect.
