



SAYAJI HOTELS (INDORE) LIMITED

Registered Address: H-1 Scheme No. 54, Vijay Nagar, Indore, Madhya Pradesh, India, 452010

Email ID: cs@shilindore.com Website: www.shilindore.com

Phone No.: 0731-4750012

POLICY ON SEXUAL HARASSMENT

Policy on Sexual Harassment

1. PREAMBLE:

Sayaji Hotels (Indore) Limited ("**the Company**") is committed to ensuring that all persons engaged with the Company work in an environment that is inclusive and provides an opportunity to bring their best selves at workplace. The Company is committed to provide a work environment that ensures every person at the workplace is treated with dignity, respect and afforded equal treatment. The Company directs its actions to ensure that everyone who visits our workplace, experiences an environment that not only promotes diversity and equality but also mutual trust, equal opportunity and respect for human rights.

The Company does not tolerate any form of discrimination, victimization, or harassment including Sexual Harassment and it is committed to take all necessary steps to ensure that nobody is subjected to any kind of harassment.

2. OUR POLICY:

- The Company is an equal opportunity employer and is committed to fostering an inclusive and equitable workplace for all employees.
- All employees are expected to create and maintain a work environment that is respectful, professional and free from discrimination, harassment, and any form of inappropriate conduct.
- The Company is committed to providing a workplace that is free of sexual harassment and where all employees are treated with dignity, respect and fairness.
- Any employee who believes they have been subjected to sexual harassment may make an complaint in accordance with the procedures and guidelines set out in this policy. All complaints will be treated fairly, seriously, with speed and empathy and in confidence.

3. OBJECTIVE:

The objective of this Policy are to:

- Define Sexual Harassment.
- Provide an effective mechanism for the prevention, prohibition, and redressal of complaints relating to sexual harassment.

4. COVERAGE:

This policy is applicable to all employees, irrespective of their level, across all units and offices of the Company.

5. DEFINITIONS:

- a. **"Employee"** - For the purpose of this policy, the term 'Employee' means any person employed by the Company; and this would also include persons who are temporary or part time or honorary employees, by whatever name called and would include persons engaged on a casual basis or for project based assignments and/or persons who are engaged through any third-party service providers. This broad definition of 'Employee' used for the purpose of this policy cannot be used to claim rights of an employee conferred by any other law of the land.
- b. **"Sexual Harassment"** - The definition of 'Sexual Harassment' shall include but not be restricted to the following:

It is such unwelcome sexually motivated behavior (whether directly or by implication) as:

- Physical contact and advances
- A demand or request for sexual favors
- Sexually colored remarks
- Showing pornography, writing sexually loaded letters/emails/SMSs and/or any other unwelcome physical, verbal or non-verbal conduct of sexual nature where the victim has reasonable grounds to believe that his/her objection to such unwelcome behavior would disadvantage him/her in connection with his/her work including recruitment/employment or allotment of work, promotion or evaluation of his/her engagement in any Company activity.

Where any such act(s) create an intimidating / hostile/ offensive work environment and/or affect the person's work performance.

Where any other adverse or hostile consequences might occur if the victim does not consent to the conduct in question or raise any objection thereto.

6. COMPLAINTS COMMITTEE:

The Company shall, by an order in writing, constitute a Committee to be known as the "Internal Complaints Committee" in accordance with the provisions of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013.

Provided that where the offices or administrative units of the workplace are located at different places or at divisional or sub-divisional levels, the Internal Complaints Committee shall be constituted at all such administrative units or offices.

The Internal Complaints Committee shall consist of the following members to be nominated by the employer, namely: –

(a) a Presiding Officer who shall be a woman employed at a senior level at workplace from amongst the employees:

Provided that in case a senior level woman employee is not available, the Presiding Officer shall be nominated from other offices or administrative units of the workplace:

Provided further that in case the other offices or administrative units of the workplace do not have a senior level woman employee, the Presiding Officer shall be nominated from any other workplace of the same employer or other department or organisation;

(b) not less than two Members from amongst employees preferably committed to the cause of women or who have had experience in social work or have legal knowledge;

(c) one member from amongst non-governmental organisations or associations committed to the cause of women or a person familiar with the issues relating to sexual harassment:

Provided that at least one-half of the total Members so nominated shall be women.

The detailed composition of the Internal Complaints Committee of the Company are as follows:

Sr. No.	Name of Committee Member	Designation
1.	Neetu Darekar	Presiding Officer
2.	Yasmin Khan	External Member
3.	Anushka Srivastava	Member
4.	Vandana Shedke	Member
5.	Ashwini Kulkarni	Member
6.	Suresh Kumar	Member
7.	Prashant Tiwari	Member

7. COMPLAINT MECHANISM:

Any employee may lodge a complaint of sexual harassment against any other employee to the Managing Director / Group HR Head or to any member of the complaint committee.

All complaints will have to be sent in writing and will be dealt with in strict confidence by the committee members. The complaints should be sent at the earliest, but preferably within 3 months from the date of occurrence of the alleged incident.

The Chairperson of the committee shall, within 7 working days of the receipt of such a complaint, personally meet or designate a member of the complaints committee to meet the employee who has made the complaint and record the statements made at such meeting. During this meeting the employee is also expected to present any corroborative material/evidence to substantiate the complaint.

After the meeting with the complainant, and on satisfaction of the existence of a prima facie case of Sexual Harassment, the chairperson shall call for a committee meeting within the next 7 working days.

During this meeting of the complaints committee, the person accused of the harassment will be called. The complaints committee will communicate the complaint to the person accused where he/she will be given an opportunity to give his/her views of the situation.

After having heard both the parties, the complaints committee shall thoroughly investigate (meet the complainant, enquire into evidence provided, meet the witnesses, consult with experts etc.) the complaint and make a report of its findings within the next two weeks. This report will be submitted to the Managing Director.

The Internal Complaints Committee shall complete the inquiry within a period of ninety (90) days from the date of receipt of the complaint and shall provide a copy of the inquiry report along with its recommendations to the employer and the concerned parties within ten (10) days of completion of the inquiry.

In case the complaint of sexual harassment is proven to be true, the accused person will be subject to strict disciplinary action, up to and including termination of employment.

In case the complaint registered is found to be frivolous or false or was made with a mischievous intention, the complainant will be liable to face strict disciplinary action up to and including termination of employment.

Any employee who is a part of the investigations shall not be victimized or subject to any unfavorable treatment. The victims of sexual harassment will have the option to seek his/her own transfer.

Before initiating an inquiry, the Internal Committee may, at the request of the aggrieved woman, take steps to settle the matter through conciliation.

Provided that no monetary settlement shall be made as a basis of conciliation. Where a settlement has been arrived at, the Internal Committee shall record the settlement and forward the same to the employer for taking appropriate action.

No further inquiry shall be conducted where the matter has been settled through conciliation.

Nothing in these guidelines should be taken in any way as a limitation on the powers to decide what disciplinary action(s) is appropriate under given circumstances.

Appeal procedure:

If the victim of sexual harassment feels unsatisfied with the outcome of his/her complaint, he/she may appeal to the Managing Director directly. In such cases Managing Director may personally investigate the case and the decision thereafter will be final and binding on all parties concerned.

Criminal Proceedings:

Where such conduct amounts to a specific offence under the Bharatiya Nyaya Sanhita (BNS) or under any other law, the Company shall support the victim in initiating appropriate action in accordance with law.

8. EMPLOYEE EDUCATION

- All employees will be made aware of this policy by circulating this policy and ensuring that they have read the same by getting their signoff.
- This policy shall be made accessible to all employees at all times on the Company's official website.

9. DISCLOSURES IN ANNUAL REPORT:

The Company shall include in its Annual Report the details relating to:

- Number of complaints of sexual harassment received during the year;
- Number of complaints disposed of during the year;
- Number of cases pending for more than ninety days;
- Nature of action taken by the Company.

The details of constitution of the Internal Committee shall also be appropriately disclosed as required under applicable laws.

10. IMPLEMENTATION:

This Policy shall be implemented across the Company with immediate effect.

MY COMMITMENT

I, Mr. /Mrs./ Ms. _____, as a employee of the Company, hereby acknowledge that I have read and understood the Company's Policy on Prevention of Sexual Harassment, which is available on the Company's official website. I undertake to abide by this policy in both letter and spirit and to uphold a workplace that is safe, respectful and free from sexual harassment.

Signature: _____

Date: _____

Name: _____

EMP ID: _____

Location/ Unit: _____

Designation: _____

Note: Employees are required to acknowledge their acceptance of this Policy in the manner prescribed by the Company.

(Latest Amended on 16th May, 2026)