



Transindia Real Estate Limited

(Formerly known as TransIndia Realty & Logistics Parks Limited)

CIN: U61200MH2021PLC372756

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Policy and Guidelines for Prevention and Prohibition of Sexual Harassment at Workplace

A. Introduction

Transindia Real Estate Limited (“the Company”) is an equal opportunity employer, and its policy ensures – no discrimination or harassment on the basis of race, color, religion, age, gender identity, national origin, citizenship, disability, marital status, or any other characteristic protected by law. It is an organization’s policy to comply with all applicable local law.

Discrimination and sexual harassment are against organization’s policy and illegal under applicable laws.

Consistent with our business principles, the organization is committed to a work environment where all individuals are treated with respect and dignity. Each individual should have the ability to work in a professional atmosphere that promotes equal employment opportunities and prohibits discriminatory practices and harassment. Towards this, it is essential that each employee deals with their colleagues and third parties with full fairness and respect and realizes that his/her behaviour will be attributed to the Company and can affect its inward and outward reputation. Harassment of any kind including sexual harassment is forbidden. Every employee has the right to be protected against harassment, regardless of whether the accused considers his or her own behaviour to be normal or acceptable and of whether the harassed person has/had the opportunity to avoid the harassment.

Sexual Harassment results in violation of the fundamental rights of a woman to equality under Article 14 and 15 of the Constitution of India and her right to life and to live with dignity under Article 21 of the Constitution of India and right to practice any profession or to carry on any occupation, trade or business which includes a right to a safe environment free from sexual harassment.

Allcargo Group’s prevention of Sexual Harassment Policy has been formed to prohibit, prevent, and deter the commission of acts of sexual harassment at workplace and to provide the procedure for the redressal of complaints pertaining to sexual harassment.

B. Objective

- a. The Company believes that all women 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.
- b. The company understand its obligation to undertake a complete investigation of the complaint/ incident reported to provide support to victim of such sexual harassment and undertake disciplinary action against delinquent to the full satisfaction of the complainant while preventing deterrent for its recurrence.
- c. To follow provisions of legislation and the Supreme Court directives and guidelines provided to prevent Sexual Harassment at workplace.

C. Applicability

This policy applies to the following categories:

- a. All employees, regardless of seniority or contractual status, that is permanent, short, or long - term contract, and temporary /casual employees, trainee, apprentice, on deputation, working as consultant, or applicants for employment whether for remuneration or not, or working on a voluntary basis or otherwise,
- b. All Board members, Executive and non-executive Directors, owners, and stakeholders,
- c. All persons dealing with the company, clients, customers, suppliers, contractors /sub-contractor and with whom employees interact personally or by telephone, or by electronic communication, including written communication, websites, and emails. And who are employed or associated with Transindia Real Estate Limited companies located in India at various locations (herein after referred to as “TREL” or “the Company”).

D. What constitute sexual Harassment?

Sexual Harassment as defined under the Act, means any unwelcome acts or behaviour (whether directly or by implication) namely: -

- a. Physical contact and advances;
- b. a demand or request for sexual favors;
- c. making sexually colored remarks;
- d. showing pornography; or
- e. any other unwelcome physical, verbal, or non-verbal conduct of sexual nature.

Sexual Harassment takes place if a person:

- a. Subjects another person to an unwelcome act of physical intimacy, like grabbing, brushing, touching, pinching etc. or remark of connotation, cracking loud jokes related thereto or conduct of a sexual nature, which could be verbal, or even non-verbal.
- b. Makes an unwelcome demand or request (whether directly or by implication) for sexual favors from another person, and further makes it a condition for employment / payment of wages /increment / promotion etc.
- c. Shows a person any sexually explicit visual material, in the form of pictures/cartoons/pinups/calendars/screen savers on computers/any offensive written material/pornographic e-mails, etc. d. It is sexual harassment if a supervisor / boss requests sexual favors from a junior in return for promotion or other benefits or threatens

to sack for non-cooperation. It is also sexual harassment for a boss to make intrusive inquiries into the private lives of employees, or persistently ask them out.

E. Management Responsibilities

Management has a general responsibility to ensure that all allegations of sexual harassment are handled in a sensitive manner, with respect for the dignity of the person/s involved. Management is responsible for ensuring that the allegations are dealt within time frame and expeditiously, with due seriousness and confidentiality; and that the allegations are dealt with in a manner which achieves a resolution of the behaviour, rather than in a mechanical procedural.

F. Adoption of Sexual Harassment Policy within framework of Code of Conduct

- a. The company is committed to the implementation of, and compliance with, all employment legislation and in terms of this policy and the Code of Conduct Practice on the Handling of Sexual Harassment Cases.
- b. Sexual harassment in the workplace is defined as a form of unfair discrimination and is unacceptable behaviour.
- c. All policies shall be aligned in such a way that due coverage takes place including terms of employment
- d. The company is committed to the implementation of the following procedures, impart the training to all employees in what constitutes sexual harassment, how complaints may be lodged, and how the complaints should be dealt with by supervisors and managers.

G. Communication of Policy and Guidelines to Employees

Employees who have experienced such conduct or any conduct falling under the provision of these guidelines must report without fear. An employee's failure to fulfil this obligation could affect his or her right to pursue legal action. Early reporting may prove to be a highly effective method of resolving actual or perceived incidents of harassment or discrimination. Therefore, while no fixed reporting period has been established, the organization strongly urges the prompt reporting of complaints or concerns so that rapid and constructive action can be taken when appropriate. The availability of this complaint procedure does not preclude individuals who believe they are being subjected to harassing conduct may promptly advise the offender that his or her behaviour is unwelcome and requesting that it be discontinued.

H. Complaint Channel

A) Formal Procedure

- a. The receiver of the behaviour should indicate both verbally and non-verbally that the behaviour is considered offensive and is unwelcome, and specifically requesting the person responsible to stop the behaviour.
- b. Where the receiver feels that they cannot do this, or they have done this, but the behaviour continues, the receiver may either ask for the behaviour to be dealt with informally or use the formal Grievance / Complaint Procedure.
- c. Formal Complaint may be lodged by filling the form marked “Annexure 1” to this policy and give accurate and correct information as per contents of the said form and send it to authority as may be decided from time to time based on region you are employed or engaged or associated, as per Policy guidelines.

B) Informal Procedure

- a. The receiver may approach someone among a member of the Human Resources Department, or their own Manager, or the Manager of the complainant.
- b. The person approached will endeavor to assist the receiver of the behaviour to resolve the matter by means of informal meetings and discussions. It may be possible for a Manager of the person responsible for the behaviour to meet with that person and indicate that the behaviour is unwelcome, is regarded as harassment, and should stop.
- c. All persons involved in seeking resolution of the unwelcome behaviour will respect the dignity and confidentiality of the persons involved.
- d. If the informal procedure does not resolve the behaviour, then the receiver may proceed to the Formal Grievance Procedure to obtain resolution.

I. Confidentiality, Record-Keeping, and Media Statements

The group has implicit responsibility and legal obligation to address the issue in utmost confidential, precise, and professional way and to ensure that company’s image is protected in a manner that justice is seen to be done and received in most appropriate way while maintaining confidentiality for good of aggrieved employee. It is necessary that we follow each stage judiciously.

- a. At all stages of the procedures, informal and formal, and from the first discussions when the potential allegations of sexual harassment are discussed, all parties to the discussion are required to be aware of the sensitivity of the matters under discussions, the potential impact on individual lives and careers. It is important to exercise extreme caution in the disclosure of the information, and where possible to maintain the confidentiality of the receiver and complainant and the person responsible for the behaviour.
- b. Once the procedures are concluded, the documents should be filed in sealed envelopes marked confidential, and lodged with the person responsible for the retention of personnel records.

c. Any requests for information from Media sources if any should be referred to the person within the company responsible for Media briefings.

d. Notwithstanding anything contained in the Right to Information Act, 2005, the content of the Complaint, the identity and addresses of the aggrieved woman, respondent and witness, any information relating to conciliation and inquiry proceedings, recommendations of the Complaint Committee and the action taken by the employer shall not be published, communicated, or made known to the public, press and media in any manner.

J. The Complaint Committee with pre-requisites

The Complaints Committee is responsible for:

- a. Investigating every formal written complaint of sexual harassment
- b. Taking appropriate remedial measures to respond to any substantiated allegations of sexual harassment
- c. Discouraging and preventing employment-related sexual harassment
- d. Initially, and till further notice, the Complaints Committee will comprise of the following 5 (five) members out of which Head of the Committee shall be woman employee at senior level of management:

Ms. Rani Mihir Shah	Presiding Officer	rani.shah@allcargologistics.com
Mr. Vishal Maheshwari	Member	vishal.maheshwari@transindia.co.in
Ms. Bhavini Shah	Member	bhavini.shah@transindia.co.in
Ms. Urvashi Howal	Member	urvashi.howal@allcargologistics.com
Ms. Kamal Damania	External Member	kamal@lolt.in

K. Dealing with Complaint

It is the obligation of all employees to report sexual harassment experienced by them personally in the prescribed form marked Annexure -1 not later than 3 months to the Chairman / Presiding Officer of Complaint Committee of any instance or behaviour of sexual harassment by a co- employee towards another employee. Provided that where such complaint cannot be made in writing, the Presiding Officer, or any member of the Complaint Committee, as the case maybe, shall render all reasonable assistance to the aggrieved woman for making the complaint in writing.

Employee also has the option of reporting the complaint using the Grievance Redressal Tab available on Darwinbox which can also be accessed on one's smart phone.

Where the aggrieved woman is unable to make a complaint on account of her physical or mental incapacity or death or otherwise, her legal heir or such other person as prescribed may make a complaint.

Once the complaint is received, it will be kept strictly confidential. The person accused will be informed that a complaint has been filed against him/her and no unfair acts of retaliation or unethical action will be tolerated. The Committee shall ensure that a fair and just investigation is undertaken immediately. The Complaint Committee, may, before initiating inquiry and at request of the aggrieved women take steps to settle the matter between her and the respondent through conciliation. Where a settlement has been arrived, the Complaint Committee, as the case may be, shall record the settlement so arrived and forward the same to the Management to take action as specified in recommendation.

Where a settlement is arrived; no further inquiry shall be conducted by the Complaint Committee. Provided that where the aggrieved women inform the Complaint Committee, that any term or condition of settlement arrived has not been complied with by the respondent, the Complaint Committee shall proceed to make an inquiry into the complaint.

The complainant and the accused shall be informed of the outcome of the investigation. The investigation shall be completed within 90 days of the receipt of the complaint. If the investigation reveals that the complainant has been sexually harassed as claimed, the accused will be disciplined accordingly.

The victim of sexual harassment has the option to seek transfer of the accused or his/her own transfer.

L. Dos and Don'ts for Complaint Committee

Internal guidelines are in place for the committee to subscribe what is relevant or otherwise care necessary for impartial and unbiased approach to complaints on sexual harassment incidents if any.

M. Awareness Training

a. All Senior Management Team Personnel and Supervisors are required to attend executive briefings on their legal duties and responsibilities in the handling of sexual harassment allegations including procedure to handle allegations of sexual harassment cases.

b. All new employees shall be informed about this policy / guidelines through intranet. In case any employee wishes to seek clarification, he / she may approach the location head.

c. Skills training is to be also required for those who may receive the complaints, not only on how to deal with the complaints, but also mediation and conflict resolution skills, and

delegates to these training workshops. HR shall identify such personnel and organize such programs.

N. Disciplinary Action

Post the enquiry complaints committee has to prepare a report stating the findings of their enquiry and recommend appropriate disciplinary action against the accused. Disciplinary action may include transfer, withholding of promotion, suspension or even dismissal. This action shall be in addition to any legal recourse sought by the complainant or as per provision of law as applicable.

However, the committee must bear it in mind that disciplinary should not be disproportionate to type / gravity of act committed and be based purely on merit.

Based on the recommendation made by the complaints committee appropriate disciplinary action shall be taken by the concerned authority. This policy and guidelines are prepared to comply with requirements of law while ensuring that protection and prevention of employees from the sexual harassment is kept at bay in the best interest of employees and the company. The company shall add, modify, and bring changes as may be warranted considering periodic situation or development or as may be found necessary.

Annexure – 1 is a form to be part of this policy and is appended to it.

Version	Effective Date	Description of changes
Version 1.0	March 31, 2023	Adoption of Policy at the Board Meeting held on March 31, 2023
Version 1.1	August 29, 2023	Adoption of Revised Policy at the Board Meeting held on August 29, 2023

Annexure - 1
{Confidential}

Grievance Redressal Form (Sexual Harassment at workplace)			
Name of the complainant		Location	
Designation		Date of Joining:	Department
Reporting To (Manager's Name)		Designation:	Employee No.
Description of Grievance/Complaint			
Is it pertaining to your own department or outside? (Please specify nature of grievance in detail, cover date place incident or proof or witness and other observation, if any)	Name and designation of the person against whom the complaint pertains to		Name:
			Designation:
	Date:	Place:	
	Witness Name:	Witness Designation:	
Has it happened for the first time or earlier as well? (Please do inform if you already have details of this incident to anyone. Let us know whom and what was the response given)	Date/s:	Frequency (Once/Twice/no):	
	1)		
	2)		
Would you like to take it for conciliation first and then to Complaint Committee or straight away, if you feel it needs to be attended to, for immediately relief?			
Please state if you are seeking transfer of your job elsewhere as an immediate measure till such time final decision is taken or arrived at			

Declaration:

I state with my full conscious that the complaint is true and nothing of personal vendetta against whom the grievance / complaint is lodged and I stand by whatever I have stated. I agree to present myself as when called for by the conciliation / complaint committee. I am aware of the Policy / Guidelines related to Sexual harassment and it falls under the said guidelines and would wish it to be processed for necessary action.

Signature of Complainant

Date