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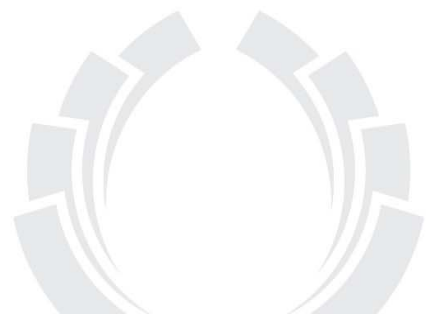
ARKADE DEVELOPERS LTD.

(Formerly known as Arkade Developers Pvt. Ltd.)

SEXUAL HARASSMENT PREVENTION POLICY

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1. OUR VISION

In our pursuit for achieving our vision, we will conduct ourselves in a manner that reflects our shared values and our commitment to conduct business in the right way. The Company strives to provide a safe environment and protection against the sexual harassment of women at workplace and for the prevention and redressal of complaints of sexual harassment and to ensure the fundamental rights of a woman to equality under Article 14 & 15 of the Constitution of India and her right to life and live with dignity under Article 21 of the constitution of India.

2. SEXUAL HARASSMENT PREVENTION POLICY

The Arkade Developers Ltd 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 work place or other than work place if involving employees is a grave offence and is, therefore, punishable.

3. SCOPE AND EFFECTIVE DATE

This Policy extends to all employees of the Company and is deemed to be incorporated in the service conditions of all employees and comes into effect immediately.

Sexual harassment would mean and include any of the following:

- i) unwelcome sexual advances, requests or demand for sexual favours, either explicitly or implicitly, in return for employment, preferential or detrimental treatment, threat to present or future employment status, promotion, examination or evaluation of a person towards any company activity;
- ii) 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 individual's sensibilities and affect her/his performance.
- iii) act or conduct by a person in authority which creates the environment at workplace





- iv) hostile or intimidating to a person belonging to the other sex; conduct of such an act at work place or outside in relation to an Employee of Arkade Developers Limited, or vice versa during the course of employment; and
- v) any unwelcome gesture by an employee having sexual overtones;
- vi) Conduct which interferes with work or creates an intimidating or hostile work environment
- vii) Humiliating conduct constituting a health and safety concern to the woman.

We must refrain from indulging in any of the above mentioned acts. Should any employee be found guilty of sexual harassment, he/she will be liable for strict disciplinary action.

4. COMPLAINT MECHANISM

A victim of sexual harassment can follow the following complaint mechanism:-

1. Complaint can be filed in writing to the Presiding Officer of the Internal Complaints Committee.
2. The Internal Complaints committee will investigate the matter and submit report to the management.
3. If an employee is found guilty of sexual harassment, the management will initiate appropriate disciplinary action in accordance with law.
4. In particular, the Internal Complaints Committee will ensure that victims or witnesses are not victimised or discriminated against while dealing with complaints of sexual harassment.

“Employee” means any person employed at the workplace for any work on the regular, temporary, ad-hoc, or daily wage basis, either directly or through agents, 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 expressed or implied and includes a worker, a contract work a probationer, trainee, apprentice or called by any other such name.





5. INTERNAL COMPLAINTS COMMITTEE

The internal complaints committee shall comprise of the following members:

- i. Presiding officer who shall be a woman, employed at a senior level at work place/other work place from amongst the employees of the Company / other organization.
- ii. 2 (two) members from amongst the employees
- iii. 1 (one) member from amongst the NGOs or associations committed to the cause of women

Provided that at least one half of the total members of the committee shall be women.

Provided further that every member of the committee shall hold office for such period not exceeding three years. A quorum of 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 lady.

Representative members shall be paid such fees or allowances as per applicable laws/company policy or as mutually decided.





6. REDRESSAL PROCESS

- i. Any employee who feels and is being sexually harassed directly or indirectly may submit a complaint of the alleged incident to any member of the Committee in writing with his/her signature within 3 months days of from the date of occurrence of incident.
- ii. The Committee will maintain a register to endorse the complaint received by it and keep the contents confidential, if it is so desired, except to use the same for discreet investigation.
- iii. The Committee will hold a meeting with the Complainant within 7 days of the receipt of the complaint.
- iv. At the first meeting, the Committee members shall hear the Complainant and record her allegations. The Complainant can also submit any corroborative material with a documentary proof, oral or written material, etc., to substantiate her complaint. If the Complainant does not wish to depose personally due to embarrassment of narration of event, a lady officer for lady employees involved shall meet and record the statement.
- v. 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 / her to give an explanation, where after, an “Enquiry” shall be conducted and concluded.
- vi. 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.
- vii. In case the complaint is found to be false, the Complainant shall, if deemed fit, be liable for appropriate disciplinary action by the Management.

7. ENQUIRY PROCESS

- The Committee shall immediately proceed with the Enquiry and communicate the same to the Complainant and person against whom complaint is made.



- The Committee shall prepare and hand over the Statement of Allegation to the person against whom complaint is made and give him / her an opportunity to submit a written explanation if she / he so desires within 7 days of receipt of the same.
- The Complainant shall be provided with a copy of the written explanation submitted by the person against whom complaint is made.
- 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 witness/es whom they propose to call.
- 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.
- 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.
- 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 Presiding Officer. 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, which may, inter alia, include punitive actions under service rules of the Company, appropriation of salary/wages of the accused/respondent to be paid to the aggrieved woman or her legal heirs.
- The Presiding Officer will direct appropriate action in accordance with the recommendation proposed by the Committee.
- The Committee shall be governed by such rules as may be framed by the Supreme Court orders or any other legislation enacted later on.

8. COMPLIANCE COMMITTEE & MANAGEMENT: KEY FUNCTIONS

The Committee may recommend to the Presiding Officer action which may include transfer or any of the other appropriate disciplinary action.



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

The management shall further ensure that notwithstanding anything that is contained in the Right to Information Act, 2005, none of the contents of the complaint, the identity & address of the aggrieved woman, respondent or witness, any information relating to the enquiry, settlement, order etc. shall be published, communicated or made know to the public, press or media unless so required by any law for the time being in force, as the case may be.

The Company shall display at any conspicuous place in the workplace, the penal consequences of sexual harassment and the order constituting the internal committee.

The company shall take steps to ensure that sexual harassment is treated as misconduct under the Service Rules of the Company and initiate action for such misconduct.

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

In case the Committee finds the degree of offence coverable under the Indian Penal Code, then this fact shall be mentioned in its report and appropriate action shall be initiated by the Management, for making a police complaint.

The matters covered under this policy shall be in addition to and not in derogation of the provisions of any other law for the time being in force.

9. REPORTING:

The Internal Committee shall in each calendar year prepare in prescribed format an annual report and submit the same to the management & district officer [*as defined in section 5 of the Sexual Harassment of Women at workplace (Prevention, Prohibition & Redressal) Act, 2013*]

The Company shall include in its report, the no of cases filed and their disposal and under the relevant laws of the land, in the Annual Report of the Company.

10. AMENDMENTS

The Company reserves the right to make amendments to this Code of Conduct.

