

POLICY ON PREVENTION OF SEXUAL HARASSMENT OF WOMEN

I. Objectives

Sinclairs Hotels Limited is committed to creating and maintaining a secure work environment where its employees will work and pursue business together in an atmosphere free of harassment, exploitation and intimidation caused by acts of sexual harassment within but not limited to the office premises and other locations directly related to the Company's business.

The objective of this policy is to provide protection against sexual harassment of women at workplace and for redressal of complaints of sexual harassment and matters connected therewith.

The policy aims at promoting safe and healthy workplaces, where everyone, irrespective of sex or status, is treated with fairness, dignity and respect.

II. Scope

The Company encourages every employee who perceives of being sexually harassed to use the redressal mechanism as provided in this policy.

The term "**workplace**" refers not only to the specific location where work is being performed, such as an office but also locations where work-related business may be conducted.

Sexual harassment is judged by the impact on the complainant and not the intent of the respondent.

III. Definitions

"**Sexual harassment**" is defined as any behaviour of a sexual nature that affects the dignity of women and men, which is considered as unwanted, unacceptable, inappropriate and offensive to the recipient, and that creates an intimidating, hostile, unstable or offensive work environment.

"**Aggrieved Person**" means a person in relation to work place whether employed or not, who alleges to have been subject to any act of sexual harassment by the respondent.

"**Company**" means Sinclairs Hotels Limited.

"**Employee**" means a person employed at a workplace for any work on regular 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.

"**Complaints Committee**" means a committee constituted by Company as per this Policy.

"**Respondent**" means a person against whom the aggrieved person has made a complaint.

"**Workplace**" includes any department, organization, undertaking, establishment, enterprise institution, office or branch unit. Any place visited by the employee arising out of or during the course of employment, including transportation provided by the employer for undertaking such journey.

IV. Responsibilities regarding sexual harassment:

All employees of the Company have a personal responsibility to ensure that their behaviour is not contrary to this policy. All employees are encouraged to reinforce the maintenance of a work environment free from sexual harassment.

V. Complaints Committee

The Company has constituted a Complaints Committee for redressal of sexual harassment complaints and for ensuring time bound resolution thereof.

The Complaints Committee will comprise of the following:

- a. A woman employee employed at a senior level.
- b. Not less than 2 members from employees preferably committed to the cause of women or who have had experience in social work or have legal knowledge.
- c. One member shall be from non-governmental organizations or associations committed to the cause of women or a person familiar with the issues relating to sexual harassment.

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

VI. Procedures for resolution, settlement or prosecution of acts of sexual harassment:

The Company is committed to providing a supportive environment to resolve the concerns of sexual harassment as under:

A. Informal Resolution Options

When an incident of sexual harassment occurs, the victims of such conduct can communicate their disapproval and objections immediately to the harasser and ask the harasser to behave decently. If the harassment does not stop if the victim is not comfortable in addressing the harasser directly, the victim can bring the concern to the attention of the Complaints Committee for grievance redressal. The Complaints Committee will thereafter provide advice or extend support as requested and will undertake prompt investigation to resolve the matter.

B. Complaints

1. An employee with a harassment concern, who is not comfortable with the informal resolution options or has exhausted such options, may make a formal complaint to the Chairperson of the Complaints Committee constituted by the Management. The complaint shall have to be in writing and in the form of a letter, preferably within 15 days from the date of occurrence of the alleged incident, sent in a sealed envelope. Alternately, the employee can send the complaint by email. The employee is required to disclose her/ his name, department, division and location of work, to enable the Chairperson to take the matter forward.

2. The Presiding Officer of the Complaints Committee will proceed to determine whether the allegations (assuming them to be true only for the purpose of this determination) made in the complaint fall under the purview of sexual harassment, preferably within 30 days from receipt of the complaint.

In the event, the allegation does not fall under the purview of sexual harassment, the Presiding Officer will record this finding with reasons and communicate the same to the complainant.

3. If the Presiding Officer of the Complaints Committee determines that the allegations constitute an act of sexual harassment, she/ he will proceed to investigate the allegation with the assistance of the Complaints Committee.

4. Where such conduct, on the part of the respondent, amounts to a specific offence under the law, the Company shall initiate appropriate action in accordance with law by making a complaint with the appropriate authority.

5. The Complaints Committee shall conduct such investigations in a timely manner and shall submit a written report containing the findings and recommendations.

Disciplinary action may include any of the following:

- a. Formal apology
- b. Counselling
- c. Written warning to the respondent and a copy of it maintained in the employee's file.
- d. Change of work assignment / transfer for either the respondent or the complainant.
- e. Suspension or termination of services of the employee found guilty of the offence

6. In case the complaint is found to be false, the Complainant shall, if deemed fit, be liable for appropriate disciplinary action by the Management.

VII. Confidentiality

The Company understands that it is difficult for the victim to come forward with a complaint of sexual harassment and recognizes the victim's interest in keeping the matter confidential.

Complaints Committee

Sl no.	Name	Designation	Contact No	Mail id
1	Ms Kumkum Gupta	Chairperson	9830041369	kumkumgupta2@gmail.com
2	Ms Rumpa Bhattacharjee	Member	9830556333	kolkata@sinclairshotels.com
3	Mr Somnath Das	Member	9830452752	somnath@sinclairshotels.com
4	Mr Ashis Chatterjee	Member	9831117904	Ashis@sinclairshotels.com