

TACTICAL MARKETING PLAN

POLICY VERSION: 2023

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DOCUMENT SUBTITLE

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I OBJECTIVE

1. Arvind Fashions Limited and its subsidiaries (the “Company”) strives to provide a professional work environment free of any harassment including Sexual Harassment (as defined hereinafter), exploitation and intimidation. The Company strictly believes that all Employees (as defined in Paragraph II A below) and Third-Party Associates (as defined in Paragraph II A below) have a right to be treated with dignity and respect, and a right against unfair discrimination at the Workplace (as defined hereinafter).

2. The Company prohibits all manner of harassment, including Sexual Harassment and any harassment and discrimination based on gender (including pregnancy, childbirth or medical condition), religion, cast, creed, race, color, age, national origin, physical or mental disability, gender identity or expression, sexual orientation, medical condition, genetic information, marital status, veteran status, military status, or any other characteristic protected by Central, State, or local law.

3. Company reaffirms its commitment to the principle that no Employee or Third-Party Associate shall be subject to Sexual Harassment. Such conduct is inappropriate for a productive work environment and is unlawful. While the Act (as defined hereinafter) is intended to protect

only women, the Company is committed to providing a Workplace free of Sexual Harassment to every individual. Thus, this Policy is intended to be gender neutral and hence will address issues of Sexual Harassment and discriminatory conduct in totality, to provide for remedies irrespective of the gender of the Parties.

1. The Policy shall apply to all business-related activities of the Company and shall include, but is not limited to, work related functions such as team events, client dinners, award functions, company celebrations, business trips, off-site meetings, office travel and conferences.

III. SEXUAL HARASSMENT

1. **“Sexual Harassment”** includes any unwelcome sexually determined behavior/conduct (whether directly or by implication) such as:

- i. physical contact and advances;
- ii. a demand or request for sexual favors;
- iii. sexually-colored remarks;
- iv. showing pornography; or
- v. any other unwelcome physical, verbal or non-verbal conduct of a sexual nature.

2 The following specific scenarios shall be considered Sexual Harassment at the Workplace:

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

3 Examples of actions of Sexual Harassment include, but are not limited to the following:

- i. Unwelcome sexual advances

- ii. These include patting, pinching, brushing up against, winking, hugging, kissing, fondling, or any other similar physical contact considered unwelcome.
- iii. Requests for demands for sexual favors
- iv. These include subtle or blatant pressures or requests for any type of sexual favors accompanied by an implied or stated promise of preferential treatment or negative consequence concerning an individual's employment status.
- v. Sexually-colored remark
- vi. These include verbal abuse or joking that is of a sexual nature and considered unwelcome or offensive by another individual. For example, comments about an individual's body or appearance where such comments are beyond mere courtesy, cracking of offensive jokes, sexually-oriented comments, innuendoes whether in person or through electronic / social media (WhatsApp, text messaging, email, Facebook, etc.) or any other actions that offend others.
- vii. Cyber-stalking
- viii. This includes repeated approach of sexual nature towards someone, using electronic communications, such as e-mail or instant messaging (IM), or messages posted to a website, blog, or discussion group etc.
- ix. Note: The examples listed above are indicative and not meant to be a complete list of objectionable behavior.

4 OTHER INDICATORS:

- i. In addition to the above, determining what constitutes Sexual Harassment depends upon the facts and the context in which the conduct occurs. Sexual Harassment may take many forms - subtle and indirect, or blatant and overt.

- a. It may be committed by any individual (Respondent), against any other individual (Complainant);
 - b. It may occur between peers or between individuals in a hierarchical relationship;
 - c. It may be aimed at coercing an individual to participate in an unwanted sexual relationship or it may have the effect of causing an individual to change behavior or work performance; and
 - d. It may consist of repeated action or may arise from a single incident.
- ii. Sexual Harassment complaints can be filed by any individual present at the Workplace, whether employed by the Company or not. Sexual Harassment complaints filed by women shall be filed only before the Internal Committee.
- iii. Relationships (**sexual or otherwise**) which are consensual are not unlawful, as such relationships are the private business of the concerned persons unless they are in conflict with the Company's Policies or they prejudice the legitimate business interests of the Company in any manner whatsoever.

III. COMPLAINTS FILING

1. The Company encourages its Employees to come forward and file a complaint against any act of harassment they encounter at the Workplace.
2. Complaints against harassment or discrimination are to be addressed to the Disciplinary Committee (as defined below) as per this Policy. The Format of the complaint for harassment & discrimination is as attached as Annexure 1 of this Policy
3. Complaints against Sexual Harassment faced by women at Workplace are to be addressed before the Internal Committee (as defined below) as per this Policy. The Format of the complaint regarding incidence of Sexual Harassment is attached as Annexure 1 of this Policy.
4. Complaints against Sexual Harassment faced by individuals other than women at Workplace are to be addressed before the Disciplinary Committee (as defined below) as per this Policy. The Format of the complaint regarding incidence of Sexual Harassment faced by individuals other than women is attached as Annexure 1 of this Policy.

IV. INTERNAL COMMITTEE AND DISCIPLINARY COMMITTEE – CONSTITUTION, FUNCTIONS, POWERS AND DISQUALIFICATION

2. Constitution of the Internal Committee

- i. The Company has constituted an Internal Committee to address grievances regarding Sexual Harassment of Women at Workplace in accordance with Section 4 of the Act (the “Internal Committee”). The number of members in the Internal Committee in no circumstance shall fall below four (4) or lower than the minimum number of members, if any, prescribed by the Act or the Rules.
- ii. Members: Amongst the members of the Internal Committee-
 - a. The presiding officer shall be a woman employed in a senior role at the Company (the “**Presiding Officer**”). If a senior woman officer is not available for a location, the Presiding Officer can be nominated from amongst the Employees in other offices.
 - b. Not less than two (2) members shall be selected from amongst the Employees committed to the cause of women or who have experience in social work or have legal knowledge of matters concerning Sexual Harassment (together “**Employee Members**”);
 - c. There shall be one (1) External Member who is familiar with the issues relating to Sexual Harassment;
 - d. It is mandated that not less than half of the members of the Internal Committee shall be women.

All members of the Internal Committee shall be selected or approved by the Board of Directors of the Company or a senior member of the management, to whom the board delegates this authority. The present list of Members is provided in Annexure- 2 attached to this Policy.

The names of the members of the Internal Committee along with their contact details shall be displayed, from time to time, on the notice board(s) at each of its offices/premises across the country, and/or the internal website / intranet of the Company. The Company shall also regularly and promptly notify (in the aforesaid manner) any changes in the constitution of the Internal Committee, or to the contact details of the members of the Internal Committee. The present members of the Internal Committee are provided in Annexure-2 of this Policy.

The Presiding Officer and every other member of the Internal Committee shall hold office for such period not exceeding three (3) Years from the date of their nomination, as may be specified by the Board of Directors of the Company or the Board's delegate.

3. Functions of the Internal Committee:

The Internal Committee shall discharge such functions including in receiving and investigating any complaints relating to Sexual Harassment of women present at the Workplace, whether employed or not, as per the Act. In particular, the Internal Committee shall:

- a. Work towards implementation of this Policy;
- b. Conduct inquiries in accordance with the procedures set out in this Policy and the Act applying the principles of natural justice and ensuring compliance with the Policy in all actions taken under, or in connection with, this Policy;
- c. Keep a record of all complaints received and the actions taken by the Internal Committee and the Company thereon.
- d. At the end of each calendar year or at such intervals as notified in the Act, prepare a consolidated report of all the complaints relating to Sexual Harassment received for the year and the actions taken by the Company thereon and shall submit the same to the concerned government department with a copy to the management of the Company.

4. Powers of Internal Committee:

The Internal Committee shall have the same powers as are vested in a Civil Court under the Code of Civil Procedure, 1908 when conducting an inquiry under this Policy. The Internal Committee shall have the power to:

- i. Summon and enforce attendance of any person and examine such person on oath; and
- ii. Require the discovery and production of documents.

Note: Where Sexual Harassment occurs as a result of an act or omission by an outsider, while the Internal Committee or the Disciplinary Committee, as the case may be, may not be in a position to investigate or take any direct action against such outsider, it shall take all steps necessary to assist the affected person in terms of support and preventive action.

5. Constitution of Disciplinary Committee

The Company under this policy has constituted a Disciplinary Committee ("Disciplinary Committee").

The present members of the Disciplinary Committee are provided in Annexure-3 of this Policy.

The constitution and term of the Disciplinary Committee will be decided and approved by the Company's MD or CHRO or their respective delegate.

The names of the members of the Disciplinary Committee along with their contact details shall be displayed, from time to time, on the notice board(s) at each of its offices/premises across the country, and/or the internal website / intranet of the Company. The Company shall also regularly and promptly notify (in the aforesaid manner) any changes in the constitution of the Disciplinary Committee, or to the contact details of the members of the Disciplinary Committee. The present list of Members is provided in Annexure-3 attached to this Policy.

6. Functions of the Disciplinary Committee:

i. Disciplinary Committee shall only hear and investigate the following complaints:

- a. All cases of Sexual Harassment filed by individuals other than women.
- b. All cases of harassment, other than Sexual Harassment of women at Workplace, filed by an Employee or Third-Party Associate.
- c. It is clarified that in the event Disciplinary Committee is in receipt of any complaint by a woman of Sexual Harassment at Workplace, it shall on the same day, and in any event not later than 24 hours, forward the same to the Internal Committee without any delay. Disciplinary Committee shall not take on record or investigate any complaint on Sexual Harassment faced by a woman at Workplace, which is the statutory duty of the Internal Committee.

ii. In addition to point (i) above, the Disciplinary Committee shall also have the following functions:

- a. Work towards implementation of this Policy;
- b. Conduct inquiries in accordance with the procedures set out in this Policy applying the principles of natural justice and ensuring compliance with the Policy in all actions taken under, or in connection with, this Policy; and
- c. Keep a record of all complaints received and the actions taken by the Disciplinary Committee and the Company thereon and file a yearly report to the MD or CHRO of the Company or their respective delegate.

7. Powers of Disciplinary Committee:

The powers of the Disciplinary Committee in the inquiry of any complaints shall be such as approved by the Company from time to time. The Disciplinary Committee is not vested with the same powers as that of the Civil Court under Code of Civil Procedure, 1908. However, the provisions of the Code of Civil Procedure, 1908 may be taken as guiding document by the Disciplinary Committee in the inquiry of any complaints before it.

8. Disqualification of Membership

- i. A member of the Internal Committee/Disciplinary Committee shall cease to hold office as a member in the event such member:
 - a. Is found guilty of disseminating information about a complaint brought before the Internal Committee/Disciplinary Committee, including details of the Complainant or the Respondent;
 - b. Is found guilty in any disciplinary proceeding; or
 - c. Has so abused such member's position in such a manner as to render such member's continuance in office prejudicial to the interests of the Employees of the Company.

ii. In addition to the grounds mentioned above, an Employee Member shall cease to hold office as a member of the Internal Committee/Disciplinary Committee in the event of any of the following occurrences:

- a. If the Employee Member ceases to be an Employee of the Company;
- b. If the Employee Member has been found guilty of Committing an act of Sexual Harassment; OR
- c. Any misconduct in accordance with the rules of the Company.

iii. If the Employee Member is related to the Respondent and/or the Complainant or is otherwise conflicted in any manner whatsoever, they must recuse themselves from the Internal Committee/Disciplinary Committee, for that particular matter.

iv. In the event of any disqualification, resignation or termination of appointment (by the Company) of any member, the Company shall, with respect to an outgoing Employee Member, forthwith notify a substitute Employee Member and shall, with respect to the other members, make best efforts to find a substitute member as quickly as possible.

9. General

- i. The Internal Committee must keep in strictest confidence details of any complaints before it and shall only disclose or divulge such information in such manner and events as permitted in the Act.
- ii. The Disciplinary Committee must keep in strictest confidence details of any complaints before it and shall only disclose or divulge such information in such manner and form as approved by the MD or CEO of the Company or their respective delegate.

- iii. The decisions of the Internal Committee/Disciplinary Committee shall be made by majority vote of its members, and in cases of division of votes equally, the Presiding Officer shall have a casting vote.

V. COMPLAINT PROCEDURE

10. Initiation of Complaint before Internal Committee:

- i. Who can make a complaint?
 - a) Any Woman Employee who has experienced or has been subjected to any act of Sexual Harassment by another Employee or a third party (the "Complainant") shall be entitled to lodge a formal complaint in writing to the Internal Committee.
 - b) Where the Complainant is unable to make a complaint on account of physical incapacity, a complaint may be filed on the Complainant's behalf by a relative, friend, co-worker, an official of the National/State Commission for Women, or with the prior written consent of the Complainant, by any person who has knowledge of the incident.
 - c) Where the Complainant is unable to make a complaint on account of mental incapacity, a complaint may be filed on the Complainant's behalf by a relative, friend, a special educator, a qualified psychiatrist or psychologist, the guardian or authority under whose care the Complainant is receiving treatment or by any person who has knowledge of the incident jointly with any of the other persons mentioned above. Where the Complainant is dead, a complaint may be filed by any person who has knowledge of the incident with the prior written consent of the legal heir of the deceased Complainant.

ii. When to make a complaint?

The Complainant is required to lodge a complaint promptly or no later than three (3) months from the date of occurrence of the alleged act of Sexual Harassment, and in case of a series of incidents, within a period of three (3) months from the date of the last incident. The Internal Committee, as the case may be, can extend the timeline by another three (3) months for reasons recorded in writing, if satisfied that these reasons prevented the lodging of the complaint.

iii. How to make a complaint?

The complaint shall be made in writing. The Complainant is required to submit six (6) copies of the Complaint along with evidence and the names of witnesses (if any) to the Internal Committee. Where the Complainant is unable to file the complaint in writing, the Presiding Officer or any other member of the Internal Committee shall provide reasonable assistance to the Complainant in making the complaint in writing. Provided however, in no event shall any member of the Internal Committee or Disciplinary Committee, as the case may be, shall write the complaint on behalf of the Complainant. The Complainant can also send the complaint via emails as mentioned in Annexure 2. (These emails shall be accessible to all the IC members).

11. Initiation of Complaint before Disciplinary Committee:

i. Who can make a complaint?

Any Employee who has experienced or has been subjected to any act of harassment or discrimination (other than the incident covered in (a) above) by another Employee or a third party (the "Complainant") shall be entitled to lodge a formal complaint in writing to the Disciplinary Committee by sending an email as mentioned in Annexure 3. (These emails shall be accessible to all the DC members) as the case may be.

ii. When to make a complaint?

The Complainant is required to lodge a complaint promptly or no later than three (3) months from the date of occurrence of the alleged act of harassment, and in case of a series of incidents, within a period of three (3) months from the date of the last incident. The Disciplinary Committee, as the case may be, can extend the timeline by another three (3) months for reasons recorded in writing, if satisfied that these reasons prevented the lodging of the complaint.

iii. How to make a complaint?

The complaint shall be made in writing. The Complainant is required to submit six (6) copies of the Complaint along with evidence and the names of witnesses (if any) to the Disciplinary Committee, as the case may be. Where the Complainant is unable to file the complaint in writing, the presiding officer or any other member of the Disciplinary Committee shall provide reasonable assistance to the Complainant in making the complaint in writing. Provided however, in no event shall any member of the Internal Committee or Disciplinary Committee, as the case may be, shall write the complaint on behalf of the Complainant. The Complainant can also send the complaint via email as mentioned in Annexure 3. (These emails shall be accessible to all the DC members).

12. Process to be followed after the receipt of complaint in writing by the Internal Committee and the Disciplinary Committee:

- i. On receipt of the complaint, the Internal Committee, or the Disciplinary Committee, as the case may be, shall serve a copy thereof to the Respondent within a period of seven (7) working days.
- ii. On receiving a copy of the complaint filed by the Complainant, the Respondent shall file a response to the complaint along with supporting documents, and names and addresses of witnesses within a period not exceeding ten (10) working days from the date of receipt of the copy of the complaint as aforesaid.

Important Note: If the Disciplinary Committee receives a Sexual Harassment complaint from a woman, they shall immediately forward the complaint to the Internal Committee. On receipt of the complaint, the Internal Committee shall proceed in accordance with the provisions of this Policy.

VI. COMPLAINT REDRESSAL - CONCILIATION/INQUIRY PROCEDURE, PUNISHMENT AND RECOMMENDATIONS

1. Basic Procedures

There are primarily two (2) basic procedures that can be followed by Internal Committee/Disciplinary with respect to any allegation of harassment, i.e.:

1. Conciliation procedure;
2. Inquiry procedure.

1. Conciliation

i. Prior to initiating an inquiry into the Complaint, the Internal Committee/Disciplinary Committee may, only at the request of the Complainant, take steps to settle the matter between the Complainant and the Respondent through conciliation, provided that no monetary settlement shall be made as a basis of conciliation.

ii. If a settlement is reached between the Complainant and the Respondent, the Internal Committee/Disciplinary Committee shall record the settlement so arrived at and forward the same to the Company, directing the Company to take appropriate action as recommended by the Internal Committee/Disciplinary Committee.

iii. The Internal Committee is required to provide the Complainant and the Respondent with copies of the settlement for their records.

iv. In the event a settlement is reached between the Complainant and the Respondent under this clause, no further inquiry shall be carried out by the Internal Committee/Disciplinary Committee.

2. Inquiry Procedure

The inquiry procedure of redressal of a Complaint submitted to the Internal Committee/Disciplinary Committee shall include:

i. Processing of the Complaint

The complaint shall be processed by the Internal Committee/Disciplinary Committee upon either:

- a. the failure of the conciliatory procedure under sub-paragraph 2 above;
- b. the Complainant opting for the Inquiry Procedure; or
- c. the Respondent failing to comply with any of the terms of the conciliation settlement or otherwise, the details of the complaint shall be circulated to the members of the Internal Committee/Disciplinary Committee.

The complaint shall be kept in the strictest of confidence at this stage. The Presiding Officer of the Internal Committee/Disciplinary Committee shall then call a meeting of the Internal Committee/Disciplinary Committee to begin the inquiry procedure.

ii. Inquiry/ Investigation Procedure

- a. The Internal Committee or the Disciplinary Committee, as the case may be, shall make an inquiry into the complaint in accordance with the principles of natural justice.¹ All proceedings of the Internal Committee or Disciplinary Committee, as the case may be, shall be conducted in the presence of a minimum of three (3) members of the Internal Committee or Disciplinary Committee, as the case may be ("Quorum"). The Presiding Officer of the said Committee must be present for all proceedings.
- b. During the inquiry process, the Internal Committee or Disciplinary Committee, as the case may be, may also pass interim order(s)/reliefs as deemed appropriate.

¹ Natural justice is a concept of common law and represents the procedural principles developed by the Courts, which every judicial, quasi-judicial and administrative agency must follow while taking any decision adversely affecting the rights of a private individual. Natural justice implies fairness, equity and equality. The principle of natural justice encompasses the following two rules: - (i) No one should be made a judge in his own cause or the rule against bias; and (ii) no one should be condemned unheard.

- c. The Internal Committee or Disciplinary Committee, as the case may be, shall decide in each case on the appropriate process for gathering relevant information from the Complainant, the Respondent and any witnesses. This may include oral and/or written statements but in each case the Complainant and the Respondent will have the opportunity to present their case to the Internal Committee or Disciplinary Committee, as the case may be, in person. The hearing will be conducted at such location as may be decided by the Committee keeping in view the need to maintain confidentiality of the investigation. However, the convenience of the Complainant and the Respondent will also be taken into consideration. The Internal Committee shall notify via email, the Complainant, and the Respondent (as well as the witnesses, if any) of the time and venue of the hearing(s) at least three (3) days prior to the scheduled date.

- d. The Internal Committee or Disciplinary Committee, as the case may be, shall also have the right to terminate the inquiry proceedings or to give an ex parte (ex-party) decision upon providing fifteen (15) days prior written notice, in the event the Complainant or Respondent fails to be present before the Internal Committee or Disciplinary Committee, as the case may be, without showing sufficient cause for three (3) consecutive hearings.

- e. The Internal Committee or Disciplinary Committee shall record the entire process of hearing and shall consider the minutes, duly signed by the parties to the inquiry, as a token of their acceptance to the record.

- f. If the respective Committee so desires, the Committee shall summon or call upon (by way of written notice) any Employee, outsider, or others to appear before the Committee as a witness.

- g. The parties are not permitted to engage any legal practitioner or other third party to represent them in their case at any stage

before the Internal Committee or Disciplinary Committee, as the case may be.

- h. During the pendency of the inquiry, on a written request made by the Complainant, the Internal Committee or Disciplinary Committee, as the case may be, shall have the right to recommend any one (1) or more of the following to the Company, at the Internal Committee's or the Disciplinary Committee's sole discretion (given the facts and circumstances of each case):
- Transfer the Complainant or the Respondent to any other Workplace;
 - Grant paid leave to the Complainant for a period of up to three (3) months in addition to the regular normal leave entitlement of the Complainant;
 - Restrain the Respondent from reporting on Complainant's work performance or writing confidential report, and assign the same to another person;
 - Change the reporting if Complainant reports to the Respondent; or
 - Grant such other relief to the Complainant as it may deem fit.
1. The Internal Committee or Disciplinary Committee, as the case may be, shall complete the inquiry within a period of ninety (90) days from receiving the complaint.

iii. Report

- a. Upon completion of the hearing, the Internal Committee or Disciplinary Committee, as the case may be, shall prepare a confidential report (the "Report"), which shall include a summary of the proceedings, the evidence adduced by the parties and the witnesses, and shall submit the same to the Company within a period of ten (10) days from the date of completion of the inquiry.

- b. Any person aggrieved by the recommendations of the Internal Committee may make an appeal against the same under Section 18 of the Act, within a period of ninety (90) days from the date on which the recommendations are made.
- c. Any person aggrieved by the recommendations of the Disciplinary Committee may make an appeal against the same before the MD or CEO of the Company or their respective delegate, within a period of ninety (90) days from the date on which the recommendations are made.
- d. The Report shall further set out the Internal Committee's or the Disciplinary Committee's conclusions on whether an offense of Sexual Harassment, or any other violation of this Policy, has been committed or occurred, or whether the complaint made by the Complainant is false and based on mala fide reasons (for reasons/rationale to be recorded in writing in each instance thereon). The Report shall further set out the Internal Committee's or Disciplinary Committee's recommendations on the disciplinary action(s) to be taken in the circumstances. All members of the Internal Committee or the Disciplinary Committee, as the case may be, shall sign the said Report.
- e. A copy of the Report must be made available to both parties (to both Complainant and Respondent) enabling them to make representation against the findings, if required.

iv. Implementation

- i. Depending upon the gravity of the offense and without prejudice to any legal right(s), the Company, in the event the Internal Committee

or Disciplinary Committee, as the case may be, is of the view that the incident of Sexual Harassment against Employee at Workplace or any other violation of the Policy has been proved, the Internal Committee or the Disciplinary Committee, as the case may be, shall forward the Report to the Company and make any of the following recommendations to the Company:

a. To take action against the Respondent including (i) declaring the action to be “misconduct” under the provisions of the applicable service rules (if any) or the Respondent’s employment agreement; (ii) procuring from the Respondent a written apology; (iii) issuing a warning, reprimand or censure; (iv) withholding of promotion; (v) withholding of pay rise or increments; (vi) termination from service; (vii) direction to undergo counseling sessions; and/or (viii) direction to carry out community service.

b. Additional powers of the Internal Committee: The Internal Committee, must recommend, in addition to the punishment provided above, to deduct from the salary of the Respondent, such sum as it may consider appropriate to be paid to the Complainant and in the event the Company is unable to deduct such amount due to the Respondent being absent from duty or cessation of employment, the Respondent can be directed to pay the amount directly to the Complainant. Further, in the event the Respondent fails to pay such an amount, the Internal Committee shall forward the order for recovery of the sum as an arrear of land revenue to the concerned District Officer authorized under the Act. It is clarified that this power in Clause b) is not vested with the Disciplinary Committee.

ii. The aforesaid recommendations are illustrative and not exhaustive and the Internal Committee or the Disciplinary Committee, as the case may be, may make such other recommendations as it may deem fit.

iii. The Board of Directors of the Company or its delegate, as the case may be, shall give effect to the recommendations of the Internal Committee or the Disciplinary Committee, as the case may be, within a period of sixty (60) days from the date of receiving the Report.

v. Quantum of Compensation to be decided by the Internal Committee:

a) In the event the Respondent is found guilty, and the disciplinary action taken by the Internal Committee includes the payment of a monetary settlement to the Complainant, the Internal Committee shall consider the following in arriving at the quantum of compensation payable to the Complainant:

- i. the mental trauma, pain, suffering and emotional distress caused to the Complainant;
- ii. the loss in career opportunity due to the incident of Sexual Harassment.
- iii. medical expenses incurred by the Complainant for physical or psychiatric treatment;
- iv. the income and financial status of the Respondent; and
- v. the feasibility of such payments in installments or a lump-sum amount.

VII. DUTIES AND RESPONSIBILITIES OF THE EMPLOYER

13. The Company shall undertake the following preventive measures to ensure that Sexual Harassment does not occur:
- i. Provide a safe working environment at the Workplace which shall include safety from the persons who may come into contact with Employees at the Workplace;
 - ii. Display at any conspicuous place in the Workplace, that any and all acts of Sexual Harassment or discrimination at the Workplace are expressly prohibited; the penal consequences of Sexual Harassment or discrimination; and the order of constitution of the Internal Committee and Disciplinary Committee;
 - iii. Organize workshops and awareness programs annually to sensitize the Employees of the provisions of the Act and annual orientation and skill building programs for the members of the Internal Committee and Disciplinary Committee;
 - iv. Provide necessary facilities to the Internal Committee and Disciplinary Committee for dealing with complaints that may be initiated under this Policy and for conducting an inquiry;
 - v. Assist in securing the attendance of the Respondent and witnesses before the Internal Committee and the Disciplinary Committee;
 - vi. Provide all information necessary to the Internal Committee and the Disciplinary Committee in relation to a complaint;
 - vii. Provide assistance to Employees if they choose to file a formal complaint against incidents of Sexual Harassment at the Workplace under the Indian Penal Code or any other Statute;
 - viii. Initiate action under the Indian Penal Code or other Statute against the perpetrator in the event they are not an employee of the Company;

- ix. Treat Sexual Harassment as a misconduct under the service rules and initiate action for each misconduct; and
- x. Monitor the timely submission of reports by the Internal Committee or Disciplinary Committee, as the case may be.

14. Apart from the measures mentioned above, the Company shall:

- i. Carry out orientation programs and seminars for the members of the Internal Committee and the Disciplinary Committee;
- ii. Conduct capacity building and skill building programs for the members of the Internal Committee and the Disciplinary Committee.

VIII CONFIDENTIALITY

1. The Company understands that it is difficult for the Complainant to come forward with a complaint of Sexual Harassment and recognizes the Complainant's interest in keeping the matter confidential. The Company wishes to inform all its employees that the contents of a Complaint under this Policy and the records of the inquiry proceedings, recommendations and reasoning shall be kept confidential under all circumstances. Except as required by law and based on the advice of legal counsel, the Company shall not disclose to any third party, other than the attorneys and qualified advisers of the Company, on a need-to-know basis who agree to be bound by the terms of this Policy, information regarding the matters contemplated by this Policy.

2. The Complainant, Respondent, witnesses, persons assisting with the inquiry process and Internal Committee/Disciplinary Committee members (who are Employees of the Company) would be liable for disciplinary action up to and including termination in case any of them breach the confidentiality of the inquiry process.

VIII. FALLS OR MALLACIOUS COMPLAINT AND EVIDENCE

During the course of an inquiry being conducted by the Internal Committee or Disciplinary Committee, as the case may be, if it is found that the Complainant has-

- (i) made a false or malicious complaint; or
- (ii) submitted false documents implicating the Respondent,

the Internal Committee or the Disciplinary Committee, as the case may be, can initiate separate proceedings against the Complainant and if found guilty, the consequences include disciplinary action including a written apology, warning, reprimand or censure, paying compensation, withholding of promotion, withholding of pay rise or increments, termination from service or undergoing counseling sessions or carrying out community service or any other disciplinary action as it may deem fit against the Complainant.

2. It is clarified that the mere inability of the Internal Committee to substantiate a Complaint made to the Internal Committee or Disciplinary Committee, as the case may be, shall not amount to a false or malicious complaint.

XI. NO RETAILATION OR VIMIZATION

The Company will permit no employment-based retaliation against anyone who brings a complaint of Harassment & Discrimination and/or Sexual Harassment or who speaks as a witness in the investigation of a complaint of Harassment & Discrimination and/or Sexual Harassment. Any employee indulging in retaliatory behavior shall be subjected to an investigation for misconduct and if found guilty, liable for appropriate penalties / punishment.

XII. MISCELLANEOUS

i. The Company shall in consultation with the Internal Committee and the Disciplinary Committee and the HR Department, periodically review the provisions of this Policy and its implementation. The Company reserves the right to amend the provisions of this Policy, from time to time, as it deems fit, so long as the Policy is in compliance with the provisions of the Act.

- ii. The provisions for Internal Committee in this Policy are drafted based on the provisions in the Act and the Rules corresponding to the Act; the Internal Committee is expected to review and conduct itself in accordance with the provisions of this Act and the rules framed thereunder at all times. In the event of conflict between this Policy and the Act and the Rules framed thereunder, the provisions of the Act shall prevail.
- iii. If you have any questions regarding this Policy, please contact your respective HR business partner
- iv. Additional details of this Policy are provided in Annexure-4.

XIII. STANDARDS OF PERFORMANCE AND CONDUCT

Like any other organizations, Company also requires order and discipline to succeed and to promote efficiency, productivity, and cooperation among employees. For this reason, it is helpful to identify some examples of types of conduct that are impermissible and that may therefore lead to disciplinary action, possibly including immediate discharge:

- Possessing or using weapons, dangerous or unauthorized materials, liquor (unless authorized), or illicit drugs in the Workplace.
- Being impaired by alcohol, illegal drugs, or intoxicants while on Company property, while on duty.

- Falsifying, removing or destroying information/data of the Company without written authorization.
- Damaging, destroying, removing without authority, or failing to return any property belonging to Company or its customers.
- Fighting, horseplay, practical jokes, or other disorderly conduct.
- Use of abusive or vulgar language.
- Engaging in any harassment or discrimination against a co-worker, customer, or vendor.
- Engaging in illegal activities or conduct that poses a health or safety hazard, including smoking in non-smoking areas.
- Soliciting or accepting gratuities from customers or vendors.
- Holding unauthorized gatherings on work premises or admitting unauthorized persons into the Workplace, unless allowed to do so by law.
- Any conduct that reflects adversely on the Company or other Employees, unless protected by law.
- Disclosing any confidential information of the Company unless required or allowed to do so by law or by the Company in writing.
- Violation of any Company rule, practice, or policy, including any policy in this Handbook.

The above is not a comprehensive list of all types of impermissible conduct and performance, and nothing in this Policy alters the at-will employment policy of the Company.

X ANNEXURES

Annexure 1 – Key points in the Complaint

The Complaint should contain the following key points:

Complaint about Harassment & Discrimination and/or Sexual Harassment (Confidential)	
Date	
Name of the Complainant	
Designation /Employee ID	
E-mail ID of the Complainant	
Date of the event	
Name of the Respondent (Accused)	
Designation/Employee ID (If known)	
E-mail ID of the Respondent (If known)	
Brief description (Attach separate sheet if necessary)	
Details of documents enclosed in evidence (if any)	
Names of witnesses proposed (if any)	
Interim Relief (if sought)	

Annexure 2 - Internal Committee

The Company's Internal Committee constitutes of the following members

Region	Employee Name	Phone No.	Email ID	Email ID
North	Amit Singh	8802819797	posh.north@arvindbrands.co.in	disciplinary.north@arvindbrands.co.in
North	Theimila Chiphang	9654819839	posh.north@arvindbrands.co.in	disciplinary.north@arvindbrands.co.in
North	Jayant Kumar Johri	9654626222	posh.north@arvindbrands.co.in	disciplinary.north@arvindbrands.co.in
East	Debika Chakraborty	9836197400	posh.east@arvindbrands.co.in	disciplinary.east@arvindbrands.co.in
West	Sunil B Shinde	9820158739	posh.west@arvindbrands.co.in	disciplinary.west@arvindbrands.co.in
West	Bhumika Rupani	9820026205	posh.west@arvindbrands.co.in	disciplinary.west@arvindbrands.co.in
West	Teresa Fernandes	9923785959	posh.west@arvindbrands.co.in	disciplinary.west@arvindbrands.co.in
South	Neha Thakur	9999083280	posh.south@arvindbrands.co.in	disciplinary.south@arvindbrands.co.in
South	Giridhar Kalyanaraman	9743999865	posh.south@arvindbrands.co.in	disciplinary.south@arvindbrands.co.in
South	David Packiaraj	9944355935	posh.south@arvindbrands.co.in	disciplinary.south@arvindbrands.co.in
Corporate	Preeti Kaushik	8424007370	posh.corporate@arvindbrands.co.in	disciplinary.corporate@arvindbrands.co.in
Corporate	Sowmya Suman	9901087201	posh.corporate@arvindbrands.co.in	disciplinary.corporate@arvindbrands.co.in

Internal Committee can be reached at - posh.corporate@arvindbrands.co.in

Annexure 3 - Disciplinary Committee Members

The Company's Disciplinary Committee constitutes of the following Members:

Region	Employee Name	Phone No.	Email ID
North	Amit Singh	8802819797	disciplinary.north@arvindbrands.co.in
North	Achal Kapoor	9871272579	disciplinary.north@arvindbrands.co.in
North	Jayant Kumar Johri	9654626222	disciplinary.north@arvindbrands.co.in
North	Debika Chakraborty	9836197400	disciplinary.north@arvindbrands.co.in
Region	Employee Name	Phone No.	Email ID
East	Debika Chakraborty	9836197400	disciplinary.east@arvindbrands.co.in
Region	Employee Name	Phone No.	Email ID
West	Sunil B Shinde	9820158739	disciplinary.west@arvindbrands.co.in
West	Bhumika Rupani	9820026205	disciplinary.west@arvindbrands.co.in
West	Teresa Fernandes	9923785959	disciplinary.west@arvindbrands.co.in
Region	Employee Name	Phone No.	Email ID
South	Neha Thakur	9999083280	disciplinary.south@arvindbrands.co.in
South	Giridhar Kalyanaraman	9743999865	disciplinary.south@arvindbrands.co.in
South	David Packiaraj	9944355935	disciplinary.south@arvindbrands.co.in
Region	Employee Name	Phone No.	Email ID
Corporate	Preeti Kaushik	8424007370	disciplinary.corporate@arvindbrands.co.in
Corporate	Sowmya Suman	9901087201	disciplinary.corporate@arvindbrands.co.in

Disciplinary Committee can be reached at - disciplinary.corporate@arvindbrands.co.in

Annexure 4 – Version Control

Version	Sections	Description of change	Author	Effective Date
1.0	All	New Policy	Rainmaker Online Training Solutions Private Limited	01.04.2023