



SAYAJI HOTELS (PUNE) LIMITED

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Policy on Sexual Harassment

1. PREAMBLE:

The Group is committed to providing a work environment that is professional and mature, free from animosity and one that reinforces our respect for the individual.

2. OUR POLICY:

- The Group is an equal opportunity employer.
- All employees are expected to create and maintain a work environment that is respectful of all persons in it.
- The Group is committed to providing a workplace that is free of sexual harassment and where all employees are treated with dignity.
- Any employee can complain about sexual harassment as per the guidelines laid down in this policy. All complaints will be treated fairly, seriously, with speed and empathy and in confidence.

3. OBJECTIVE:

The Objective of this policy is:

- To define Sexual Harassment.
- To provide for an effective complaint redressal mechanism if there is an occurrence of sexual harassment.

4. COVERAGE:

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

5. DEFINITIONS:

- a. **“Employee”** - “employee” means a person employed at a workplace for any work on regular, temporary, ad hoc or daily wage 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.
- b. **“Sexual Harassment”** - includes any one or more of the following unwelcome acts or behavior (whether directly or by implication) namely: –

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

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 organization;

(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 organizations 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:

Effotel Baroda		
Sr.No.	Name of Committee Member	Designation
1.	Mrs. Kinjal Pandya	Presiding Officer
2.	Ms. Diya Solanki	Member
3.	Mr. Hemant Sharma	Member
4.	Ms. Yasmeen Khan	NGO Member

Sayaji Pune		
Sr.No.	Name of Committee Member	Designation
1.	Ms. Trupti Jadhav	Presiding Officer
2.	Ms. Monica Vanga	Member
3.	Mr. Kishor Bhagat	Member
4.	Mr. Swapnil Sonawane	Member
5.	Ms. Yasmeen Khan	External Member

7. COMPLAINT MECHANISM:

Any employee may lodge a complaint of sexual harassment against any other employee to the any member of the complaint committee as well as HR of the respective units.

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 a period of three months from the date of incident and in case of a series of incidents, within a period of three months from the date of last incident.

Provided further that the Internal Committee for the reasons to be recorded in writing, extend the time limit not exceeding three months, if it is satisfied that the circumstances were such which prevented the woman from filing a complaint within the said period.

The Presiding Officer 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 Presiding Officer 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 Director/Key Managerial Personnel's of the Company.

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 Director/ Key Managerial Personnel's 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 Director/Key Managerial Personnel's directly. In such cases Director/Key Managerial Personnel's 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 Indian Penal Code or under any other law, the Group 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.
- A copy of this policy shall be readily available to all employees of the Company through the HR portal of the Company.

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 will be implemented across the group with immediate effect.

MY COMMITMENT

I, Mr. /Ms. _____, as a member of the Group, have read and understood the Group's Policy to Address Sexual Harassment. I hereby commit to abide by this document in letter and spirit, a copy of which has been made available to me.

Signature: _____

Date: _____

Name: _____

EMP ID: _____

Location/ Unit: _____

Designation: _____

Note: Each employee is requested to complete this and hand it over duly signed to the HR Department.

** This Policy was approved by the Board of Directors at its meeting held on August 11, 2023 and was last reviewed and amended on May 28, 2026.*