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“Cantabil Retail India Limited is committed to providing a work environment that is professional and mature, free from animosity and one that reinforces our value of integrity that includes respect for the individual.”

## 1. 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.

## 2. Scope

This policy is applicable to all employees, irrespective of their level, across all stores and offices of Cantabil Retail India Limited.

In addition to this the scope of sexual harassment will include ‘Third Party Harassment’ too.

Third Party Harassment is where sexual harassment occurs by a third party (not an employee of the organization) - for example a client, a vendor or any other person that the employee is interacting with for work purposes. In this case ‘the employer and person in charge will take all steps necessary and reasonable to assist the affected person in terms of support and preventive action.’

This document provides guidelines for the robust process of dealing with sexual harassment, and outlines steps for employees to report any incident of sexual harassment. Every employee will be given a fair trial according to the ‘principle of natural justice.’

The principle of natural justice includes three key features:

1. The right to be heard by an unbiased tribunal
2. The right to have notice of charges of misconduct
3. The right to be heard in answer to that charge

These guidelines are in accordance with the Supreme Court Judgment on Sexual Harassment at the Workplace.

## 3. Definitions and acronyms

- 3.1. “**Employee**” -For the purpose of this policy, the term “employee” means any person on the rolls of Cantabil Retail India Ltd including offices and stores. This will include employees who fall in the managerial, supervisory or workmen cadre.



3.2. **“Sexual Harassment”** – The definition of “Sexual Harassment” shall include but not be restricted to the following.

Sexual Harassment is unwelcome sexually motivated behaviour (whether directly or by implication) such as:

- Physical contact and advances
  - A demand or request for sexual favours
  - Sexually coloured remarks
  - Showing pornography, writing sexually loaded letters/emails/SMSs
  - And/or any other unwelcome physical, verbal or non-verbal conduct of sexual nature
- Where the victim has reasonable grounds to believe that his/her objection to such unwelcome behaviour would disadvantage him/her in connection with his/her work including recruitment/employment or allotment of work, promotion or evaluation of his/her engagement in any Company activity.
  - 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.

3.3 **“Complaints Committee”**: A Committee formed under this policy to investigate complaints of sexual harassment referred to it and make appropriate recommendations to the relevant management team.

3.4 **“Management Team”**: A Management team refers to the person/s vested with the powers to take appropriate disciplinary action

3.5 **“Chairperson/ In charge”**: She heads the team of complaints committee members and is responsible for ensuring investigation of a complaint is conducted in an unbiased/ fair manner & confidentiality is maintained.

3.6 **“Secretary”**: He/ She will be directing the complaints emails to the respective complaints committee who have to carry out the investigation of the case. He/ She will also be responsible for adhering to timeline and drive responses within timelines specified and grant no exceptions while executing this responsibility.

#### 4. Key Actions and Responsibilities

S No	Activity	Responsibility
1	Create awareness amongst employees about the policy	Ms. Poonam Chahal
2	Ensuring every new joinee is made aware of the policy	Mr. Rajesh Nair



## 5. Policy Description

### 5.1 Complaints Committee

In line with the Supreme Court guidelines, a Complaints Committee has been formed under this policy at Head Office and at each Zonal Office to investigate complaints of sexual harassment referred to it and carry out investigations for the relevant management team to take decision on such matters.

A woman shall head the Complaints Committee and at least half of its members shall consist of women. Further, to prevent the possibility of any undue pressure or influence from any quarter, such Complaints Committee will also involve a third party, any external member who is well respected in the community and is knowledgeable on the subject of sexual harassment.

#### Internal Complaints Committee at Head Office

Internal complaints committee will receive and investigate the complaints raised by employees in the Head Office and also any complaints that may be referred to it by the Zonal Complaints Committee in certain specific instances

The Internal complaints committee at Cantabil Retail India Limited constituted as below:

Internal Complaints Committee			
Business	Name	Role	Email or Contact No
Manufacturer and Retailer of Apparels	Ms. Poonam Chahal	Chairperson	Poonam @cantabilinternational.com, 9266629500
	Ms. Renu Aggarwal	Secretary	Renu.aggarwal@cantabilinternational.com,9266629503
	Mr Rajesh Nair	Member	<a href="mailto:Rajesh.nair@cantabilinternational.com">Rajesh.nair@cantabilinternational.com</a> , 9266629434
	Mr. Ashwani Aggarwal	Member	<a href="mailto:akaficwa@gmail.com">akaficwa@gmail.com</a> , 9811282502

#### Zonal Level Complaints committee at each Zonal Office

A zonal level complaints committee is constituted at each zone. The zonal level complaints committee will receive and investigate the complaints raised by employees in the respective zones and stores in those zones

### 5.2 Complaints Mechanism

Any employee may lodge a complaint by writing an email about the incident of sexual harassment



against any other employee.

In case an employee is uncomfortable writing to the Complaints Committee, he/she must know that it is possible to submit a written complaint directly to the head of the organization.

In case an employee is uncomfortable putting the complaint in writing at all, he/she must know that an oral complaint can be filed. In this case, a written transcript of the complaint must be made and duly signed by the complainant.

The email IDs are meant for any employee to raise a complaint of sexual harassment at work place to the respective Complaints Committee.

All complaints will have to be sent in writing and the following details of the complainant should be clearly mentioned in the complaint.

**Template for Reporting Sexual Harassment**

**To: The Sexual Harassment Complaints Committee**

**Sexual Harassment details:**

Who is/are the person/people involved in this sexual harassment case? Please provide the name, designation, Unit, Business and relationship with you (eg supervisor, colleague etc)

**Critical Incidents and Factual Data:**

- a. Please describe the incident/s
- b. List supporting information/ data that you would have, that the Committee can seek from you while investigating. E.g. exact date/s, place/s of the incident/s, witnesses, if any, text messages, emails etc

Date: \_\_\_\_\_

Location: \_\_\_\_\_

Name of the Person reporting: \_\_\_\_\_

Contact Information: \_\_\_\_\_

(Mention official e-mail id / cell no)

The respective complaints committee will be responsible for conducting an investigation within 3 weeks of receipt of the complaint.

All complaints will be dealt with in strict confidence by all the committee members.

Only complaints received on the official email will be considered valid for any further action by the



respective complaints committee.

### 5.3 Redressal mechanism and stipulated timelines

1. An employee who experiences sexual harassment by another individual in the organization will compile information that supports the case. The employee will submit the complaint using the template given within 15 days of the alleged incident.
2. When the employee sends a written complaint to the relevant committee using the format prescribed only. The Secretary will first check whether the complainant has sent the complaint to the right committee if not then it will be sent across to the responsible complaints committee.
3. Once the complaint has been sent to the committee, the committee will first do a preliminary investigation to check whether the complaint seems to be genuine.
4. Under no circumstances, the committee would reveal / disclose the identity of the 'accused' to anyone else (including the immediate manager) – other than all those who are required to know about the case.
5. During investigation, if the committee concludes that the complaint is not a genuine one and the complainant has sent the complaint with malicious intent, the committee will issue a warning letter to the complainant or any other suitable action as required.
6. The committee will work towards ensuring that the investigation is completed by following the laws of the land and principles of natural justice within 3 weeks of the complaint being reported. If the investigation cannot be completed within 3 weeks, then the committee needs to have very valid and strong reasons for the same. The same needs to be communicated to the Chairperson of the committee at the next higher level.
7. If the accused is found guilty and the investigation is completed, the committee will recommend the quantum of punishment to be given. While deciding on this, the committee will consider the following:
  - Severity of the misconduct
  - Past record of the employee
  - Past precedence of treating similar violations
8. Action could also be recommended against employees who abetted the misconduct knowingly. Written warning would also be issued to employees who were "in the know", but did not highlight the same.
9. The employee has the option to appeal to the next higher level committee i.e. Internal Complaints Committee only. If he / she appeals, the decision of this committee will be final and binding.
10. If the employee chooses to appeal against the order, he / she has to submit a request in writing to the Internal Complaints committee within 7 days of receiving the order. If the request is not received within 7 days, the Internal Complaints committee has the option to reject the appeal.
11. Based on the request for appeal, the committee will decide whether to re-investigate / re-look at the quantum of punishment. However, the Internal Complaints committee will close the case within 21 days of receiving the appeal.



12. The victim employee has the option of seeking his/her own transfer.

13. The Chairperson will receive a closure report of the case after the punishment has been implemented by the respective management.

Zonal Complaints Committee in certain specific cases as it deems fit, may forward complaints directly only of the following nature to the Zonal Management Team for further deliberation or investigation.

# Complaints that are critical or severe in nature or involve a senior member in the zone

# Complaints where there are insufficient evidences to arrive at a closure.

This exception would be allowed only in the above said situations and not beyond.

**The timeline for above exception situations will be as follows:**

The respective Zonal Complaints Committee to raise the specific case with Zonal Management team within 15 days of receipt of the complaint.

The Zonal Complaints committee to present its findings and the bone of contention to the Zonal Management team in writing to facilitate quick decision on the case.

The Management Team to then give a final decision on the respective case in a week from receipt from the Zonal Complaints committee.

Nothing in these guidelines should be taken in any way as a limitation on the powers of the Zonal Management Team to decide what disciplinary action(s) is appropriate under given circumstances.

**5.4 Appeal procedure**

If the victim of sexual harassment feels unsatisfied with the outcome of his/her complaint to the Zonal Complaints Committee as, he/she may appeal to the Internal Complaints Committee. This committee after hearing the appeal shall review the case and present their recommendations to the appropriate Management Team. The decision of the Internal Committee will be final and binding on all parties concerned.

**5.5 Criminal Proceedings**

Where such conduct amounts to a specific offence under the Indian Penal Code or under any other law, Cantabil Retail India Limited shall support the victim in initiating appropriate action in accordance with law.

**6. Metrics**

- No of complaints received & reported within timelines in a month by each complaints committee to the respective Management Team at the Zonal level.
- No of queries resolved in stipulated timelines by each management team.



- ▯ No of complaints escalated by Zonal level Complaints Committee each month to the respective Management Team.

## **7. MIS Reporting**

- ▯ List of employees against whom complaints have been raised more than once to be shared with respective Business Manager or Function Head and respective Head HR on quarterly basis.
- ▯ No of issues not resolved within stipulated timelines at each Complaints Committee to be shared with the Business Level Management team.

## **8. Assumptions and Exceptions**

Any exception to these policy guidelines will be considered on a case-to-case basis and the same has to be approved by the CPO.

The interpretation of this policy rests exclusively with the Company. The decision of the Company shall be final and binding.