



POLICY ON PREVENTION OF SEXUAL HARASSMENT AT WORKPLACE

I. COMMITMENT:

Our Company is committed to providing work environment that ensures every employee is treated with dignity and respect and afforded equitable treatment.

The Company is also committed to promoting a work environment that is conducive to the professional growth of its employees and encourages equality of opportunity.

The Company will not tolerate any form of sexual harassment and is committed to take all necessary steps to ensure that its employees are not subjected to any form of harassment.

II. SCOPE:

This policy applies to all employees (full-time, part-time, trainees and those on contractual assignments) of the Company including all subsidiaries and affiliated companies at their workplace or at client sites. The Company will not tolerate sexual harassment, if engaged in by clients or by suppliers or any other business associates.

In accordance with the principle of '**Notional Extension**', the term workplace includes but is not limited to:

1. Offices or other premises where the Company's business is conducted.
2. Sites where company-related activities are performed, away from the Company's premises.
3. Social events, dinners, or gatherings organized, sponsored or funded by the Company whether held on or off the Company premises.
4. Locations visited by employees arising out of or during the course of employment, including business trips, client sites, off-site meetings, seminars, conferences, and official training programs.
5. Modes of transit provided by the Employer for undertaking a journey to and from the place of work or for official travel.
6. Digital environments where work related interactions occur, including but not limited to Video Conferencing platforms (Zoom, MS Teams, Google Meet, etc.), messaging applications (such as MS Teams, WhatsApp, etc.) and email communications.



III. DEFINITION OF SEXUAL HARASSMENT:

Sexual harassment may be one or a series of incidents involving unsolicited and unwelcome sexual advances, requests for sexual favours, or any other verbal or physical conduct of sexual nature.

Sexual Harassment at the workplace includes:

1. unwelcome sexual advances (verbal, written or physical),
2. demand or request for sexual favours,
3. any other type of sexually-oriented conduct,
4. verbal abuse or 'joking' that is sex-oriented,
5. any conduct that has the purpose or the effect of interfering with an individual's work performance or creating an intimidating, hostile or offensive work environment and/or submission to such conduct is either an explicit or implicit term or condition of employment and /or submission or rejection of the conduct is used as a basis for making employment decisions.

Inappropriate conduct could also be a joke, a prank or even a compliment. These gestures also lead to harassment although the intention of the individual might not be to offend the other person.

Any act of sexual harassment occurring in these extended or virtual spaces shall be deemed a Misconduct under this policy and the POSH Act 2013 and shall be subject to the same disciplinary and enquiry procedures as if the act had occurred within the office premises.

IV. RESPONSIBILITIES REGARDING SEXUAL HARASSMENT:

All employees of the Company have a personal responsibility to ensure that their behavior is not contrary to this policy.

All employees are encouraged to reinforce the maintenance of a work environment free from sexual harassment.

V. COMPLAINT MECHANISM:

An appropriate complaint mechanism in the form of '**Complaints Committee**' has been created in the Company for time-bound redressal of the complaint made by the victim.



The Complaints Committee will comprise of the following four members:

1. **Presiding Officer:** Woman employee at the level of Assistant General Manager or above
2. Senior Woman Employee from Personnel Function **(Member)**
3. Divisional / Plant Personnel Head / Branch Commercial Manager or any other Senior employee of the Division / location from where the complaint has originated **(Member)**
4. Member from an NGO or Lawyer **(Member)**

The Presiding Officer reserves the right to nominate more members of appropriate seniority and rank in the committee to conduct such enquiries to ensure equal representation of the gender as that of the complainant or for any other valid reason.

Refer to Annexure C, for details of the current members of the Committee at each location. The Company will keep on updating the list as and when changes are made.

The Complaints Committee is responsible for:

- Investigating every formal written complaint of sexual harassment
- Taking appropriate remedial measures to respond to any substantiated allegations of sexual harassment
- Discouraging and preventing employment-related sexual harassment

VI. PROCEDURES FOR RESOLUTION, SETTLEMENT OR PROSECUTION OF ACTS OF SEXUAL HARASSMENT:

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

A. Informal Resolution Options

When an incident of sexual harassment occurs, the victim of such conduct can communicate their disapproval and objections immediately to the harasser and request the harasser to behave decently.

If the harassment does not stop or if victim is not comfortable with addressing the harasser directly, the victim can bring their concern to the attention of the Complaints Committee for redressal of their grievances. 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 Presiding Officer of the Complaints Committee constituted by the Management. The complaint shall have to be in writing and can be in form of a letter, submitted within 3 months from the date of the incident and in case of a series of incidents, within a period of 3 months from the date of the last incident.

The Complaints Committee can extend the timeline for filing the complaint, for reasons to be recorded in writing, by a period of 3 months. Alternately, the employee can send complaint through an email. The employee is required to disclose their name, department, division and location they are working in, to enable the Presiding Officer to contact them and take the matter forward.

Employees may also write directly to the Whistle Officer appointed by the Company at disclosure@godrej.com.

Complaint against any member of the Complaints Committee or employee in Strategic Job Responsibility Band (or equivalent) and above should be sent directly to the CMD of the Company.

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 or the allegation does not constitute an offence 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, he/ she will proceed to investigate the allegation with the assistance of the Complaints Committee.
4. Where such conduct, on the part of the accused, 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 on action to be taken to the “Whistle Officer” appointed by the Company as soon as practically possible and in any case, not later than 90 days from the date of receipt of the complaint. The Whistle Officer, Head- Personnel & Administration and the Chief Executive Officer (CEO) of the Company will jointly take decision on the corrective action based on the recommendations of the Complaints Committee and keep the complainant informed of the same.

Corrective action may include any of the following:

- a. Formal apology
 - b. Counselling
 - c. Written warning to the perpetrator and a copy of it maintained in the employee’s file.
 - d. Change of work assignment / transfer for either the perpetrator or the victim.
 - 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.

[\(For more details, refer to the pictorial representation of the process flow given in Annexure B\)](#)

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.

To protect the interests of the victim, the accused person and others who may report incidents of sexual harassment, confidentiality will be maintained throughout the investigatory process to the extent practicable and appropriate under the circumstances.

VIII. ACCESS TO REPORTS AND DOCUMENTS:

All records of complaints, including contents of meetings, results of investigations and other relevant material will be kept confidential by the Company except where disclosure is required under disciplinary or other remedial processes.



IX. PROTECTION TO COMPLAINANT / VICTIM:

The Company is committed to ensuring that no employee who brings forward a harassment concern is subject to any form of reprisal. Any reprisal will be subject to disciplinary action.

The Company will ensure that the victim or witnesses are not victimized or discriminated against while dealing with complaints of sexual harassment.

However, anyone who abuses the procedure (for example, by maliciously putting an allegation knowing it to be untrue) will be subject to disciplinary action.

X. CONCLUSION:

In conclusion, the Company reiterates its commitment to providing its employees, a workplace free from harassment/ discrimination and where every employee is treated with dignity and respect.



ANNEXURE A

FAQs on Prevention of Sexual Harassment at Workplace

1. What does the term 'sexual harassment' mean?

→ 'Sexual harassment' is defined as unwelcome sexual advances, requests for sexual favors and other verbal / visual / physical conduct of a sexual nature when:

1. submission to such conduct is made a term or condition of employment, promotion, examination or evaluation of an individual towards any company activity OR
2. submission to OR rejection of such conduct is used as a basis for employment, promotion, examination or evaluation decisions affecting the individual; OR
3. such conduct has the purpose OR effect of unreasonably interfering with an employee's work performance creating an intimidating, hostile, OR offensive working environment.

2. What are the acts which constitute sexual harassment?

→ Many different kinds of conduct – verbal, visual or physical, that is of a sexual nature, may be sexual harassment, if the behavior is unwelcome and if it is severe or pervasive. Some examples may include, but are not limited to, the following:

- Verbal or written: Comments about clothing, personal behavior / life, or a person's body; suggestive or obscene letters / notes / invitations / emails OR phone calls / SMSs; turning work discussions to sexual topics; sexual or gender-based jokes OR teasing; demand / request of sexual favors OR continued expressions of sexual interest after being informed that the interest is unwelcome; sexual taunts OR innuendos etc.
- Physical: Unnecessary / inappropriate physical contact; obstructing OR blocking movement; assault etc.
- Non-verbal: Derogatory gestures OR facial expressions of a sexual nature; following a person etc.
- Visual: Posters, drawings, pictures, screensavers OR emails of a sexual nature; showing of pornography etc.

3. In case an employee is facing sexual harassment, what should he / she do?

→ The concerned employee should make a complaint to the Presiding Officer of the Complaints Committee constituted by the Management by writing a letter sent in a sealed envelope. Alternately, the employee can send complaint through an email. The employee is required to disclose his / her name, department, division and location where the employee is working in, to enable the Presiding Officer to contact them and take the matter forward.



4. Who are the members of the current Complaints Committee?

→ The Company has instituted a Complaints Committee at each location for redressal of sexual harassment complaint (made by the victim) and for ensuring time bound resolution of such complaints. Till further notice, the Complaints Committee will comprise of four members, out of which at least two members will be of the same gender as that of the complainant. Refer to Annexure C for contact details of the members of the location wise Complaints Committees.

The Presiding Officer reserves the right to nominate more members of appropriate seniority and rank in the committee to conduct such enquiries.

5. What will the Complaints Committee do on receiving a complaint of sexual harassment from an employee?

→1) The Complaints Committee shall take immediate necessary action to cause an inquiry to be made discreetly or hold an inquiry, if necessary & keeping the matter confidential.

2) The Complaints Committee shall, after examination of the complaint, submit its recommendations to the “Whistle Officer” appointed by the Company. If the examination of the complaint reveals that the accused is guilty, the Committee shall also recommend the disciplinary action to be taken.

3) The decision of the Management will then be communicated to the accused as well as the complainant.

6. What can be the consequences of sexual harassment?

→ The Company will take each complaint of sexual harassment seriously and investigate. If any employee is found guilty of any conduct that can be construed as sexual harassment, the employee will be liable to corrective action which may include any of the following:

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



7. How can an employee feel assured that their complaint of sexual harassment will be kept confidential or that they will not face any threats and other dangerous retaliatory behaviour from the accused individual?

→ If an employee experiences sexual harassment; he / she should bring it to the Management's notice without any fear or hesitation. It is the responsibility of the Complaints committee to maintain complete confidentiality of all complaints concerning sexual harassment.

Taking action against any employee, who brings a sexual harassment issue to the Management's notice, is strictly forbidden.

Reports of threats and other forms of retaliatory behaviour will be taken seriously. Anyone found to have retaliated against an employee will face disciplinary action and possible dismissal.

8. An incident of sexual harassment against an employee took place outside the Company premises at

- i. a dealer's office; or
- ii. while on official tour; or
- iii. a virtual meeting; or
- iv. during a business conference.

Will it be covered under the policy?

→ Yes, this Policy will be applicable to all allegations of sexual harassment made by an employee, irrespective of whether sexual harassment is alleged to have taken place within or outside the Company premises, or in a digital space, during the course of employment.

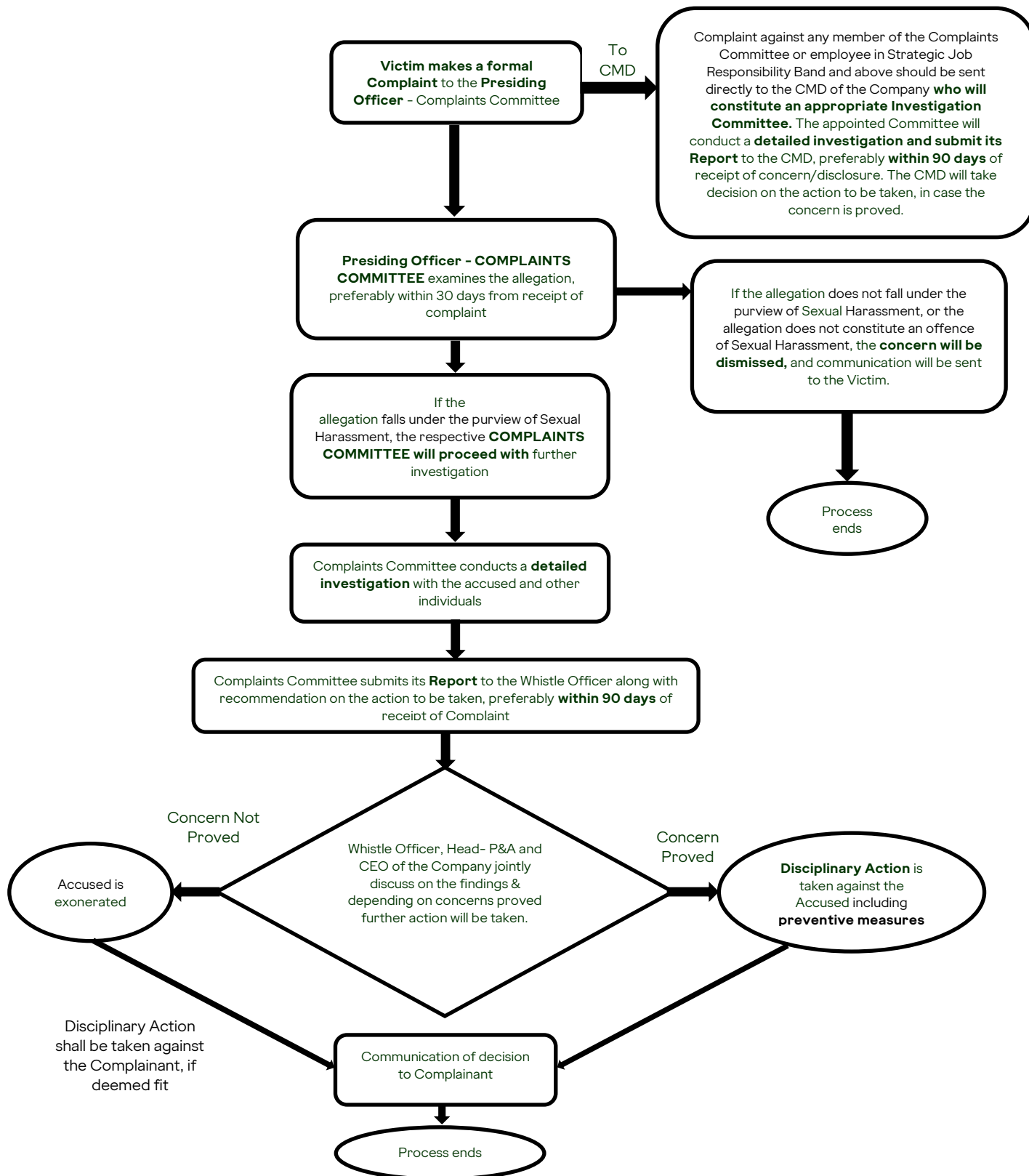
9. What are the rights of the accused person?

→ Accused person has below mentioned rights:

1. the right to be heard. The Committee must give adequate time and opportunity to them to communicate their say on the matter
2. the right to be informed of the outcome of the investigation and shall be so informed in writing by the Company after the completion of the inquiry/ investigation process

Annexure B

PROCESS FLOW





Annexure- C

Name and Contact details of Location wise Complaints Committee Members

As on 1st September 2026

The Company has instituted Complaints Committee which has three Central Committee members and a Committee member of the Division / Location as mentioned below:

Central Committee members:

Role	Name	Contact No.	Email ID
Presiding officer	Ms. Harpreet Kaur	022-67964102	harpreet@godrej.com
Member	Ms. Reena Lakra	022-67964167	rl@godrej.com
External Member	Mr. Bharat Goyal	-	bggoyal63@gmail.com

Committee Members:

Role in Organisation	Name	Contact No.	Email ID
AVP - Corporate HR	Sandal Kanchan	022 67964134	kanchan@godrej.com
AVP - Corporate ER	Patel S B	022 67964180	spatel@godrej.com
AVP - Corporate HR & DPH – Brand & Strategic Insights, Digital	Dube Sunil B	022 67964137	sunil@godrej.com
DPH – Personnel & Administration	Tejashree Mhatre	022 67964194	tejashri@godrej.com
DPH - Corporate Departments	Purnima Deshmukh	022 67964175	purnima@godrej.com
DPH - Commercial Department & Business Excellence	Anagha Fernandes	022 67965065	anaghajf@godrej.com
DPH – Aerospace	Sharad Pawal	022 67962821	sharadrp@godrej.com
DPH - Precision Engineering	Sharad Pawal	022 67962821	sharadrp@godrej.com
DPH – Appliances	Chopra Gaurav	022 67966024	gauravc@godrej.com
DPH - Estates	Ajay Deb Barma	022 67961023	adbarma@godrej.com
DPH – Energy Solutions	Meher Keki Guard	022 67962221	meherd@godrej.com
DPH – Interio	Pastakia Zubin R	022 67962421	zrp@godrej.com
DPH – Motor Solutions	Sandeep Deo	075067 81975	skdeo@godrej.com



DPH – Locks & Architectural Solutions	Joshi Pallavi A	022 67964821	spallavi@godrej.com
DPH – Material Handling	Vinod S Kakade	022 67964621	vinodsk@godrej.com
DPH – Vending & Energy Storage Solutions	Kshama Handa	022 67962621	kshama@godrej.com
DPH – Process Equipment	Sudhir K Patlekar	022 67964521	skpatlekar@godrej.com
DPH – Security Solutions	Nilesh Dattaram Ambre	022 67964721	nileshda@godrej.com
DPH – Tooling	Kshama Handa	022 67962721	kshama@godrej.com
DPH – Storage Solutions	S Kumar	044 6654 4021	skumar@godrej.com

Location	Name	Contact No.	Email ID
Shirwal – Appliances	Chopra Gaurav	022 67966024	gauravc@godrej.com
Pirangut – Appliances	Harigovindan S Varrier	0265-2830130	varrier@godrej.com
Mohali – Appliances	Chopra Gaurav	022 67966024	gauravc@godrej.com
Dabaspete – Energy Solutions	Meher Keki Guard	022 67962221	meherd@godrej.com
Bhagwanpur – Interio	Jagpal Singh	01334 -660612	jagpals@godrej.com
Haridwar – Interio	Jagpal Singh	01334 -660612	jagpals@godrej.com
Khalapur – Interio	Pastakia Zubin	022 67962421	zrp@godrej.com
Shirwal – Interio	Pastakia Zubin	022 67962421	zrp@godrej.com
Tambaram – Interio	Mahendra Babu S	044-22628002	mb@godrej.com
Kudal, Madkai, Thivim – Locks & Architectural Solutions	Joshi Pallavi A	022 67964821	spallavi@godrej.com
Vadodara – Locks & Architectural Solutions	Joshi Pallavi A	022 67964821	spallavi@godrej.com
Khalapur – Material Handling	Vinod S Kakade	022 67964621	vinodsk@godrej.com
Shindewadi – Motor Solutions	Sandeep Deo	075067 81975	skdeo@godrej.com
Dahej – Process Equipment	S K Patlekar	022 67964521	skpatlekar@godrej.com
Bhosari – Vending	Kshama Handa	022 67962621	kshama@godrej.com



Location	Name	Contact No.	Email ID
BCM - Mumbai	Sandeep Kumar Singh	022-67961301	sksingh@godrej.com
BCM - Pune	Abhishek Jain	020-28645171	abhijain@godrej.com
BCM - Ahmedabad	Rajaguru Dibyendu	079-66060769	draj@godrej.com
BCM - Bangalore	Singh Kuldeepak	080-66472011	kuldepak@godrej.com
BCM - Bhopal	Hemant Pandey	0755-4089301	hemantp@godrej.com
BCM - Bhubaneshwar	Dibyendu Dawn	0674-2374601	dawn@godrej.com
BCM - Chandigarh	Tushar Bhalerao	0172-5009090	tusharb@godrej.com
BCM - Chennai	Vaibhav Khangan	044-6654 4310	khangan@godrej.com
BCM - Coimbatore	Vijay N M	9629864177	vijaynm@godrej.com
BCM - Delhi	Mathur Ajay	0120-5114102	amathur@godrej.com
BCM - Guwahati	Mrinal Doley	0361-2468201	mrinal@godrej.com
BCM - Hyderabad	Kushalkumar Sammohi	040-66431010	kushals@godrej.com
BCM - Jaipur	Raji M Abraham	0141-7131401	raab@godrej.com
BCM - Kochi	Hari Kumar S	0484-6612601	hariks@godrej.com
BCM - Kolkata	Irfan Wadood	033-6601 3602	irfan@godrej.com
BCM - Lucknow	Balram Mudgil	0522-4265700	bmudgil@godrej.com
BCM - NCR	Sharma Manoj	0120-5114101	ms@godrej.com
BCM - Patna	Kaushik Banerjee	0612-6606101	bkaushik@godrej.com
BCM - Ranchi	Om Prakash	0651-6603901	op@godrej.com
BCM - Raipur & Nagpur	Sudhansu Bebartta	0771-6606601	sbebartta@godrej.com