KW Group - Policy for Prevention, Prohibition and Redressal of Sexual Harassment of Women at Workplace

Table of Contents

S. No.	Particulars	Page No.
1.	Purpose	2
2.	Scope	2
3.	Definitions	2
4.	Internal Complaints Committee	3
5.	Complaints	3
6.	Conciliation	4
7.	Interim Measures	4
8.	Inquiry Procedures	4
9.	Actions	5
10.	Confidentiality	5
11.	General	6
12.	Policy Review	6
	Annexure A- INTERNAL COMPLAINTS COMMITTEE	7-9

1. Purpose

At KW Group, we are committed to provide a non- discriminatory, non- hostile and harassment free work environment for women. Accordingly, this Policy is formulated under the Company's Policies and the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (hereinafter referred as the **"POSH Act 2013"**) and The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Rules, 2013 (hereinafter referred as the **"Rules"**).

This Policy mandate that, no woman shall be subjected to Sexual Harassment at the workplace. Sexual Harassment at the workplace is a grave offence and is, therefore, punishable.

2. Scope

This policy is applicable to all entities of KW Group and applies to all employees (including probationers, interns, trainees and consultants) of KW Group regardless of roles, seniority and employment status.

3. Definitions

3.1 "Sexual Harassment" includes any one or more of the following unwelcome acts or behavior (whether directly or by implication) namely:

a) Physical contact and advances
b) A demand or request for sexual favors
c) Making sexually colored remarks
d) Showing pornography
e) Any other unwelcome physical, verbal or non-verbal conduct of sexual nature

Further, any of the following circumstances, among other circumstances, if it occurs or is present in relation to or connected with any act or behavior of sexual harassment may amount to sexual harassment:

a) implied or explicit promise of preferential treatment in employment
b) implied or explicit threat of detrimental treatment in employment
c) implied or explicit threat about present or future employment status
d) interference with work or creating an intimidating or offensive or hostile work environment
e) humiliating treatment likely to affect health or safety

3.2 "Workplace" means all the administrative locations of KW Group entities and includes any place visited by the employee of KW Group arising out of, or during the course of employment including transportation provided by the Company for undertaking such journey. Below are the workplaces:

a) KW Group, Block / Building No. B-97, Sector-63, Noida-201301, being used as Corporate office/Head office of all entities of KW Group;

b) KW Delhi-6 situated at Main Road, NH-58 Bypass, Raj Nagar Extension, Ghaziabad, Uttar Pradesh 201017, **Site office of KW Homes Private Limited for the Commercial Project "KW DELHI- 6")**;

c) KW Blue Pearl situated at Plot No. 2, D.B. Gupta Road, Near Faiz Chowk, Jhandewalan, Karol Bagh, Delhi- 110005, **Site office of Madhyam Housing Private Limited for the project "KW BLUE PEARL**".

3.3 "Aggrieved Woman" in relation to a KW Group workplace means a woman of any age, whether employed or not, who alleges to have been subjected to any act of Sexual Harassment by the respondent.

3.4 "Respondent" in relation to KW Group workplace is a person against whom the aggrieved woman has made the complaint.

3.5 "Employer" means a senior employee of KW Group entity and administrative location who has been designated as employer for the purpose of the Act.

4. Internal Complaints Committee

Internal Complaints Committee ("the Committee") was reconstituted with effect from 01.01.2025 as mentioned in **Annexure A.**

5. Complaints

5.1 Who

a. Any Aggrieved Woman from a KW Group workplace can approach to any member of the Committee with a complaint regarding Sexual Harassment.

b. Where the Aggrieved Woman is unable to make a complaint due to mental, physical incapacity or for any other reason, the designated representative as prescribed under the Act or Rules (hereinafter referred to as "Complainant") can file the necessary complaint in the prescribed manner.

c. All concerns falling under the category of "Sexual Harassment", received by any Company official, Ombuds person or any other employee of the Company shall be forwarded / directed to any member of the the Committee at the earliest and no later than one week of receipt, for further action by the the Committee.

5.2 How

a. The complaint should be submitted in writing to any member of **the Committee**.

b. The complaint should contain following details:

i. Name of Aggrieved Woman / Complainant
ii. Name of Respondent
iii. Details of incident or incidents
iv. Evidence, if available
v. Names and details of witnesses, if available

Copy of complaint along with supporting documents and names and address of witness shall be forwarded to the Committee at email id **hr1@kwgroup.in**.

c. The **Committee** shall send one copy of the complaint to the Respondent within a period of **seven** working days.

d. The Respondent should file their reply to the complaint along with the list of documents, names and addresses of witnesses, within a period not exceeding **ten** working days from the date of receipt of the written complaint.

5.3 When

The complaint should be submitted within a period of **three months** from the date of the incident of Sexual Harassment, and in case of a series of incidents, within a period of three months from the date of the last incident. **The Committee**, for the reasons to be recorded in writing, can 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 three months from the date of the incident of sexual harassment.

6. Conciliation

6.1 The Committee may, before initiating inquiry, at the request of the aggrieved woman take steps to settle the matter between her and the respondent through conciliation.

6.2 No monetary settlement shall be made as a basis of conciliation.

6.3 The conciliation process should be carried out and implemented in accordance with the Act and where a settlement is arrived at between the aggrieved woman and the Respondent, no further inquiry shall be conducted by the Committee. However, when any term or condition of the settlement has not been complied with the Respondent, the Committee shall proceed to make an inquiry into the complaint or forward the complaint to the police as deemed fit by the the Committee.

7. Interim Measures

During inquiry, on a written request made by the aggrieved Woman or Complainant, the Committee may recommend the Employer to:

a. transfer the Aggrieved Woman or the Respondent to any other team / department or other branch / location within the Company; or

b. grant paid leave to the Aggrieved Woman up to a period of three months or until such time as the investigation is completed, whichever is earlier; or

c. restrain the Respondent from reporting on the work performance of the Aggrieved Woman or writing her appraisal and assign the same to another person; or

d. require the Respondent to remain or work from home or work out of an office where the Aggrieved Woman is not located, if this is considered necessary in the facts and circumstances of the case; or

e. grant such other relief to the Aggrieved Woman as may be prescribed by the Act / Rules / applicable Standing Orders / Company Policy or as may be necessary.

On the Recommendation of the Committee, the employer shall implement the recommendations and send the report of such implementation to the Committee.

8. Inquiry Procedure

8.1 The Committee shall inform the Employer of the fact of it having received a complaint.

8.2 In conducting the inquiry, a minimum of three members of the Committee including the Presiding Officer shall be present.

8.3 The Presiding Officer shall chair the meetings of the Internal Complaints Committee. If the Presiding Officer is absent or unable to attend the meeting, then the members present shall elect a Presiding Officer

for the meeting who shall be a senior woman employee from amongst the other members of the the Committee.

8.4 The parties shall not be allowed to bring in any legal practitioner to represent them in their case at any stage of the proceedings before the the Committee.

8.5 All complaints shall be investigated in a sensitive and confidential manner without disclosing the identity of the Complainant, the Respondent or any witness or any other confidential information or material in connection with the complaint.

8.6 The inquiry shall be completed within a period of ninety days.

8.7 After completing its inquiry, the Committee will submit recommendations and its report to the Employer for further action, if any, within ten days of the conclusion of the inquiry. The report of the Committee will also contain recommendations on action, if any, required to be taken on the complaint and also corrective, preventive and other actions, if any, required from the Company.

9. Actions

a) The Company views Sexual Harassment of a woman very seriously and notwithstanding anything contained in any other Policy of the Company, the following acts shall constitute a misconduct and breach of ethical behavior:

i) Sexual Harassment;
ii) Harassment or intimidation of a complainant or witness or other person in connection with a Sexual Harassment complaint;
iv) Making malicious allegations of Sexual Harassment against the Respondent;
v) Making of a complaint of Sexual Harassment knowing it to be false;
vi) Producing a forged or misleading document before the Committee.

However, it is clarified that a mere inability to substantiate a complaint or provide adequate proof will not constitute misconduct or a breach of ethical behavior.

b) Misconduct or breach of ethical behavior mentioned above is punishable with appropriate disciplinary action in accordance with Company Policy and can include any of the following actions:
i) written apology;
ii) written or verbal warning, reprimand or censure;
iii) withholding of promotion / pay rise / increments;
iv) deduction from salary of Respondent to be paid to Aggrieved Woman;
v) termination of services;
vi) counseling;
vii) community service

Recommendation of **the Committee** shall be acted upon by the Employer within a period of sixty days of the date of receipt of the report of **the Committee**.

10. Confidentiality

The Contents of the Complaint, the identity and addresses of the aggrieved woman, respondent and witnesses, any information relating to conciliation or inquiry proceedings, recommendations

of the Committee and action taken by the employer shall not be published, communicated or made known to the public, press or media in any manner.

Any person who breaches confidentiality shall be liable for disciplinary action in accordance with the service rules of the Company and penalty as prescribed under the POSH Act, 2013.

11. General

a. The Company will ensure compliance with all the requirements of the Act and Rules and will ensure that this Policy, including information regarding members of the committee and the penal consequences of Sexual Harassment are displayed on the notice boards of all its administrative locations.

b. The Company will organize workshops and awareness programs at regular intervals for sensitizing the employees with the provisions of the Act and training programs and seminars for the members of the **Committee** to effectively handle the complaints in the manner as prescribed in the Act and Rules.

c. In each calendar year, **the Committee** shall prepare an annual report and submit the same to the Employer. The annual report shall also be submitted to the District Officer at such time as may be prescribed under the Act. The **Committee** shall include in the annual report information regarding number of cases filed, their disposal under the Act and Rules; actions taken; number of complaints pending for more than 90 days and the number of workshops and awareness sessions conducted on Sexual Harassment.

d. As per the Companies (Accounts) Rules, 2014, a statement will be given as a part of the Director report that the Company has complied with provisions relating to the constitution of Internal Committee under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013.

12. Policy Review

The Policy may be reviewed at the end of each calendar year by the Company to ensure that it remains consistent with the overall objectives of the Company and with the applicable laws. The Policy may be reviewed at shorter intervals if the law pertaining to Sexual Harassment changes before the stipulated time of review.

^ This policy is not exclusive. It includes all the Provisions of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 including any notification & amendment issued by the government.

Issued for and on behalf of KW Group

Sd/
Pankaj Kumar Jain
Director (KW Group)

(ANNEXURE A)

INTERNAL COMPLAINTS COMMITTEE (HEAD OFFICE)

S. No.	Member's Name	Designation	Contact No.	Email ID
1.	Mrs. Chavi Agarwal	Presiding Officer	8377004575	Mdo2@kwgroup.in
2.	Mrs Pooja Kumari	External Member	8200542130	Poojatiwary17a@gmail.com
3.	Mrs. Tuljapurkar Vaishnavi Charudutta	Member	9625924816	Mdo3@kwgroup.in
4.	Mr. Ankur Seghal	Member	8377008639	Hr1@kwgroup.in
5.	Mr. Sanjay Kesarwani	Member	9910455877	Pm11@kwgroup.in

➢ **THIS COMMITTEE REPRESENT THE FOLLOWING COMPANIES**

- KW HOMES PRIVATE LIMITED
- MADHYAM HOUSING PRIVATE LIMITED
- ACCURATE INFRA DEVELOPERS PRIVATE LIMITED
- KW SECURITY AND SERVICES PRIVATE LIMITED

INTERNAL COMPLAINTS COMMITTEE (KW DELHI-6)

S. No.	Member's Name	Designation	Contact No.	Email ID
1.	Mrs. Chavi Agarwal	Presiding Officer	8377004575	Mdo2@kwgroup.in
2.	Mrs. Pooja Kumari	External Member	8200542130	Poojatiwary17a@gmail.com
3.	Mrs. Tuljapurkar Vaishnavi Charudutta	Member	9625924816	Mdo3@kwgroup.in
4.	Mr. Prashant Kumar Singh	Member	8588897346	SM1@Kwgroup.in
5.	Mr. Sanjay Kesarwani	Member	9910455877	Pm11@kwgroup.in

➢ **THIS COMMITTEE REPRESENT THE FOLLOWING COMPANIES**

- KW HOMES PRIVATE LIMITED
- MADHYAM HOUSING PRIVATE LIMITED
- KW SECURITY AND SERVICES PRIVATE LIMITED

INTERNAL COMPLAINTS COMMITTEE (KW BLUE PEARL)

S. No.	Member's Name	Designation	Contact No.	Email ID
1.	Mrs. Chavi Agarwal	Presiding Officer	8377004575	Mdo2@kwgroup.in
2.	Mrs Pooja Kumari	External Member	8200542130	Poojatiwary17a@gmail.com
3.	Mrs. Tuljapurkar Vaishnavi Charudutta	Member	9625924816	Mdo3@kwgroup.in
4.	Mr. Rajeev Ranjan	Member	9643107376	SM2@Kwgroup.in
5.	Mr. Sanjay Kesarwani	Member	9910455877	Pm11@kwgroup.in

➢ **THIS COMMITTEE REPRESENT THE FOLLOWING COMPANIES**

- MADHYAM HOUSING PRIVATE LIMITED