

Chalet Hotels Limited

(formerly known as Chalet Hotels Private Limited)

Raheja Tower, Plot No. C-30, Block 'G', Next to Bank of Baroda, Bandra Kurla Complex, Bandra (E), Mumbai
400051

CIN: L55101MH1986PTC038538 Tel:- 91-22-26564000

POLICY ON PREVENTION OF SEXUAL HARASSMENT AT WORKPLACE

PURPOSE

At Chalet Hotels Limited (Company), we desire to uphold a healthy and congenial working environment that enables employees to work without fear of prejudice, gender bias and sexual harassment.

SCOPE

This policy is applicable to all employees of Chalet Hotels Limited and its group companies across all locations. References in this policy to "Employee" shall include Regular Employees, Directors and Consultants at the Registered Office as well as the Branch Offices/Hotels/Project/Site Offices.

INTRODUCTION

The Company values every employee and is committed to protect the dignity and respect of each employee. Company will have 'zero tolerance' for sexual harassment and any act of sexual harassment will invite serious disciplinary action.

This policy aims to inform the employees about what conduct constitutes sexual harassment and in the unlikely chance of such an occurrence, to enable a fair mechanism for dealing with such misconduct.

POLICY COVERAGE

'Sexual Harassment' is any unwelcome sexually determined behavior (whether directly or by implication), such as:

- Physical contact and advances
- A demand or request for sexual favors; whether verbal, textual, graphic, electronic or by any other action.
- Sexually colored remarks
- Showing pornography
- Any other unwelcome physical, verbal or non-verbal conduct of sexual nature whether by words, gestures or actions.

The definition of sexual harassment shall include any harassment caused to female or male employees. It would also include harassment caused to or by either gender.

COMPLAINT REDRESSAL COMMITTEE

A Committee has been constituted to consider and redress complaints of Sexual Harassment.

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INTERNAL COMPLAINTS COMMITTEE (ICC)

Chairperson: Ms. Anshu Shroff, Assistant General Manager – Legal & Company Secretary,

Email ID: anshu.shroff@chalethotels.com

Contact: (022) 26564240

Member: Ms. Urvi Aradhya, Director Human Resources – K. Raheja Corp

Email ID: uaradhya@kraheja.com

Contact: (022) 26564564

Member: Mr. Rajneesh Malhotra, Vice President – Operations & Asset Management

Email ID: rajneesh.malhotra@chalethotels.com

Contact: (022) 26565498

Member: Ms. Ruchi Rudra, Senior Manager - Investor Relations

Email ID: ruchi.rudra@chalethotels.com

Contact: (022) 26564332

Member: Ms. Maya Bhat, Advocate (External Committee Member)

Email ID: bhattmaya671@gmail.com

Contact: (022) 26046149

COMPLAINT PROCESS

- I. Any employee who feels being sexually harassed directly or indirectly may submit a complaint of the alleged incident to any member of the Committee in writing with his/her signature within 10 days of occurrence of incident.
- II. The Committee will hold a meeting with the Complainant within a week of the receipt of the complaint.
- III. Thereafter, the person against whom complaint is made may be called for a deposition before the Committee and an opportunity will be given to him/her to give an explanation, where after, an "Enquiry" shall be conducted and concluded.
- IV. The Committee shall immediately proceed with the Enquiry and communicate the same to the Complainant and person against whom complaint is made.
- V. In the event, the complaint does not fall under the purview of Sexual Harassment or the complaint does not constitute an offence of Sexual Harassment, the same would be dropped after recording the reasons thereof.
- VI. The Committee shall complete the Enquiry within a period of 3 months from the date of commencement of Enquiry. Feedback would be provided with regard to outcome of the Enquiry within 10 working days of completion of the Enquiry. The exact nature of any disciplinary action taken against any person will remain confidential.

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The exact nature of disciplinary action to be taken shall be decided by the Managing Director or in his absence by the Executive Director of the Company.

The Committee shall be governed by such rules as may be framed by Supreme Court Orders from time to time and by any other legislation that may be enacted on this subject from time to time.

Given the sensitive nature of cases of sexual harassment and their impact on the victim as well as the person against whom such allegations are leveled, Chalet Hotels Limited is committed to maintaining confidentiality in relation to such complaints and the resultant Enquiry.

HOTELS

Internal Complaints Committee (ICC) comprising of appropriate members as required under the 'The Sexual Harassment of Women at Workplace (Prevention, Prohibition & Redressal) Act, 2013 have been formed by the respective Hotels.

The Committees at the Hotels shall submit reports in the format prescribed to the Company's Committee on a quarterly basis.

AMENDMENT

The Company reserves the right to amend or modify this policy in whole or in part, at any time without assigning any reason whatsoever.

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