

Savannah Seeds Private Limited

Prevention of Sexual Harassment Policy

Reference Number: SSPL/POSH/POSH Policy Version No. V2.

Effective date: 10th October, 2024

PREAMBLE

Savannah Seeds Private Limited is committed to maintaining a work environment free from all forms of harassment and discrimination for all associates, in line with its principles of equality, equal opportunity, and human rights.

A key component of a pleasant and conducive work environment is respect for the individual, regardless of gender. To reinforce this, behaviors that undermine mutual respect have been articulated for better understanding.

SCOPE

This policy is applicable to all employees of Savannah Seeds Private Limited, at both the Gurgaon and Hyderabad office locations. It also applies to non-employees (third-party payroll vendors) with whom we interact during the course of work, such as business partners, trainees, etc. This Act covers a wide range of situations that generally occur in any type of organization, which may result in the sexual harassment of employees. The scope of this Act is to protect employees from such harassment.

POLICY STATEMENT

Savannah Seeds Private Limited aims to:

1. Create a working and learning environment free from inappropriate conduct, where all individuals associated with the company are treated with dignity, courtesy, and respect.
2. Implement training and awareness strategies to ensure all staff and trainees know their rights and responsibilities.
3. Provide an effective complaint procedure based on the principles of natural justice.
4. Handle all complaints in a sensitive, fair, timely, and confidential manner.
5. Ensure protection from any victimization or reprisals.
6. Encourage the reporting of behavior that violates the appropriate conduct policy.
7. Promote appropriate standards of conduct at all times.

WHAT IS SEXUAL HARASSMENT?

Unwelcome: The key factor in defining sexual harassment is whether the behavior is unwelcome. The impact and effect on the recipient define the behavior as sexual harassment. Sexual harassment can occur between individuals of any gender. It includes any unwelcome sexually determined behavior, such as:

1. Physical contact or advances
2. A demand or request for sexual favors
3. Sexually colored remarks
4. Showing pornography
5. Any other unwelcome physical, verbal, or non-verbal conduct of a sexual nature

These acts, when committed in relation to the victim's employment or work (whether salaried, voluntary, or otherwise), may be humiliating and create a hostile work environment. They are discriminatory if the victim has reasonable grounds to believe that refusal would result in disadvantage or retaliation in connection with their employment or work, including recruitment or promotion.

EXAMPLES OF SEXUAL HARASSMENT:

- Unwelcome acts of physical intimacy (e.g., grabbing, touching, brushing against)
- Requests or demands for sexual favors, especially as a condition of employment, pay, or promotion
- Unwelcome remarks with sexual connotations, jokes, or sexist remarks
- Display of sexually explicit material (pictures, cartoons, etc.)
- Non-verbal actions (e.g., staring, offensive gestures, making sounds)
- Exhibitionism or inappropriate requests for dates after refusal
- Creating a hostile work environment through inappropriate behavior or remarks

A hostile work environment can also arise from a personal relationship between colleagues if it affects the work atmosphere for others.

HOW TO HANDLE UNDESIRED BEHAVIOR:

If you experience or witness sexual harassment:

- Know your rights: Sexual harassment is illegal, and both the law and Savannah Seeds Private Limited prohibit it.
- Ask the person to stop (if you feel comfortable). It may be difficult, but it can effectively stop unwelcome behavior.
- Seek support: Talk to friends, contact the Internal Complaints Committee (ICC), and keep records if possible (e.g., emails, texts). The list of the said Members is posted in our canteen area or mentioned at the end of this policy.
- Report to HR: If the behavior continues, report it to your HR Lead, who can assist confidentially.
- Inform the External Member: You can directly approach the external member if you are the victim of any such scenario.
- File a formal complaint with the ICC if the situation persists.

WHAT NOT TO DO:

- Do not blame yourself: Sexual harassment is not your fault, and it is not caused by how you dress or act.
- Do not ignore it: Ignoring the behavior may make it worse.
- Do not delay: Acting quickly can prevent escalation.
- Do not hesitate to seek help: Speaking up can protect others from similar experiences.

RETALIATION WILL NOT BE TOLERATED

Savannah Seeds Private Limited will not tolerate retaliation against anyone who reports misconduct. Any claims of retaliation will be investigated and addressed. Disciplinary action, up to and including dismissal, will be taken against anyone responsible for reprisals.

PROCEDURE FOR DEALING WITH COMPLAINTS:

- Any staff member who believes they have been subjected to sexual harassment may file a complaint with the Internal Complaints Committee (ICC). The complaint can be made in writing or orally, although a written complaint is preferred.
- Formal complaints must be filed with the ICC or HR Lead within three months of the incident.
- The ICC will initiate the redressal process within 10 days of receiving the complaint and complete its investigation within six weeks. Decisions and actions will be finalized within two weeks of receiving the ICC report.

PROCESS OF INQUIRY:

1. The Committee will ask the complainant to submit a detailed statement of incidents.
2. The defendant will submit a response.
3. The Committee will maintain confidentiality throughout the process.
4. Both parties may seek representation from staff or a colleague.
5. Verbal hearings will be conducted with both parties, and proceedings may be recorded with consent.
6. The Committee will review testimonies and evidence fairly.
7. If the defendant fails to participate, the Committee may proceed with the inquiry.
8. A decision will be made based on the evidence.
9. Upon completion of the investigation, both parties will be informed of the outcome.
10. If sexual harassment is determined to have occurred, appropriate action will be taken, including disciplinary action or termination.

REPORTING TO AUTHORITIES:

Where such conduct amounts to a specific offense under the Indian Penal Code or any other law, Savannah Seeds Private Limited will initiate appropriate legal action.

INTERNAL COMPLAINTS COMMITTEE (ICC):

1. Ms. Komal Tanwani-Presiding Officer (Mobile No. + 91 8851231146 and Email ID: ktanwani@savannahseeds.com)
2. Mr. Ravish Ambol-Member (Mobile No. +91 9669593333 and Email ID: rambol@savannahseeds.com)
3. Mr. Sunil Kumar Poonia-Member (Mobile No. +91 9610890895 and Email ID: spoonia@savannahseeds.com)
4. Mrs. Chandni Trivedi-Member (Mobile No. +91 9818646789 and Email ID: ctrivedi@savannahseeds.com)
5. Ms. Parul Agrawal- External member (Mobile No. +91 9873005305 and Email ID: advparulagrawal@gmail.com)

REVIEW

This policy shall be reviewed as and when deemed necessary by management.