



Statement of Intent
Global Action Plan for Prevention and
Redressal of Workplace Sexual
Harassment

Table of Contents

SECTION 1	4
I. INTRODUCTION	4
II. OBJECTIVES:	4
III. SCOPE:	4
IV. KEY HIGHLIGHTS	5
SECTION 2	6
V. DEFINITIONS	6
1. Aggrieved Person	6
2. Complainant	6
3. Employee	6
4. Employer	7
5. Respondent	7
6. Workplace	7
7. “Sexual Harassment”	7
SECTION 3:	9
VI. REDRESSAL OF COMPLAINTS:	9
1. Constitution of the IC	9
2. Membership of the IC	10
VII. FILING OF COMPLAINT	10
1. Limitation period for filing of complaint	10
2. Complaint on behalf of the complainant	11
3. Modes of filing a complaint	11
4. Filing of reply	11
On receipt of the complaint, the IC shall send 1 copy of the complaint (and other supporting documents, information, other details, etc., submitted by the Complainant to it) to the Respondent within 7 working days.	11
5. Whistleblower	12
VIII. CONCILIATION	12
1. Initiation of Conciliation	12
2. Settlement	12
3. No further Inquiry	12
IX. INQUIRY PROCESS	13
1. Initiation of Inquiry	13
2. Manner of conducting Inquiry into the complaint	13
3. Standard of Proof	13

4. Impact-Intent Assessment	13
5. Interim measures during pendency of Inquiry	14
6. Termination of proceedings/Ex parte order	15
7. Completion of Inquiry and IC’s Report	15
i. Timeline for completion of Inquiry	15
ii. Where allegations are not proved	15
8. Where allegations are proved	15
9. Action for false or malicious complaint or false evidence	16
10. Timeline for Report by the IC	17
11. Implementation by the Employer	17
X. MISCELLANEOUS	20
1. Confidentiality	20
2. No Recording of Inquiry Proceedings	20
3. Non-Retaliation	20
4. Obligations of the Employees	21
5. Obligations of the Human Resources team members of the Company	21
6. Obligations of the Company	22
7. Obligations of the IC	22
Annexure 1: Persons who can file a complaint on behalf of an Aggrieved Person	23
Annexure 2:	24
Table 1: Composition of IC under National Laws	24
Table 2: Penalties under National Laws	24
Annexure 3: IC Members for Godrej Consumer Products	25
Anti Sexual Harassment Apex Committee Members for Godrej Industries and associate companies	30
Whistleblowing Officer	31
Transgender Person Complaints Officer	31

SECTION 1

I. INTRODUCTION

Protection against sexual harassment and the right to work with dignity are universally recognized human rights. There should be zero tolerance for acts of sexual harassment or gender discrimination in the workplace.

All global offices of Godrej Consumer Products Limited and its subsidiaries (herein referred to as Godrej Consumer Products) in India, Sri Lanka, South Africa, Mozambique, Chile, Argentina & United States of America, are committed to eliminating workplace sexual harassment and creating a safe and respectful working environment. Our aim is to enable employees to speak up about any incidents relating to workplace sexual harassment without the fear of hostility or retaliation. We are committed to addressing any and all concerns related to workplace sexual harassment in a fair and timely manner, while also providing access to justice for each employee irrespective of their race, caste, religion, colour, ancestry, marital status, gender, age, nationality, ethnic origin or disability.

II. OBJECTIVES:

- To provide protection against any form of workplace sexual harassment.
- To prevent and address any concerns related to workplace sexual harassment in a fair, transparent, and timely manner.
- To foster an environment wherein each individual associated with Godrej Consumer Products is able to create and promote a safe work environment for people of all genders and sexual orientations.
- To encourage an environment wherein each individual associated with Godrej Consumer Products is able to report concerns related to workplace sexual harassment without fear, hostility or retaliation.

III. SCOPE:

This statement of intent is applicable to-

(i) every individual (whether employee or not) associated with Godrej Consumer Products and includes but not limited to permanent, temporary, or Ad Hoc employees, individuals engaged on a daily wage basis, employed directly or through an agent, contractual workers, probationers, trainees and apprentices or any person called by any

other name or designation including individuals working in honorary, on deputation, retainership, as a third party vendor, distributor or in consultancy capacity whether working in its offices or manufacturing sites or branch offices located globally;

(ii) customers, clients, stakeholders, visitors, outsiders, etc., if they are subjected to any Sexual Harassment at the Workplace by any individual as defined in clause II (i).

(iii) If there is a conflict between the terms under this document and the applicable local law/ guidelines, the terms under the applicable local law/ guidelines shall prevail over the terms under the document.

IV. KEY HIGHLIGHTS

- Keeping in mind its commitment to fostering Diversity, Equity, Inclusion, and Belonging within the workplace, Godrej Consumer Products' efforts at eliminating workplace sexual harassment are not limited to women only. Therefore, persons of all genders, gender identities, and sexual orientations can file a complaint as an Aggrieved Person if they are subjected to any Sexual Harassment at the Workplace by an Employee of the Company.
- For the protection of transgender persons and to ensure non-discrimination, Godrej Consumer Products has nominated a "Complaint Officer" who will be responsible for addressing complaints and concerns related to workplace sexual harassment and discrimination of trans individuals. The details of the Complaints Officer are mentioned in **Annexure 3**.
- In the event a person with disabilities (PWD) wishes to file a complaint of workplace sexual harassment, Godrej Consumer Products will provide them with the required assistance for facilitating an inclusive inquiry process. This includes the provision of a scribe or sign language interpreter, making documents available in accessible formats, and providing reasonable accommodations during inquiry proceedings.
- Vendors, partners, suppliers, retailers, consultants or any other third party associated with Godrej Consumer Products in any capacity for any duration are obligated to be compliant with relevant national laws and regulations related to prevention and redressal of workplace sexual harassment. In an event such a vendor, partner, supplier, retailer, consultant or any other third party fails to do so, Godrej Consumer Products reserves the right to take appropriate action for strict enforcement of the same.

SECTION 2

V. DEFINITIONS

1. Aggrieved Person

“Aggrieved Person” in relation to a Workplace, means a person of any age, gender, or sexual orientation, whether an Employee or not, who alleges to have been subjected to any act of Sexual Harassment by an Employee of the Company.

Explanation:

(a) Even persons who are not Employees of the Company, such as customers, clients, stakeholders, visitors, outsiders, etc., are covered by this policy, and can file a complaint as an Aggrieved Person, if they are subjected to any Sexual Harassment at the Workplace by an Employee of the Company.

Explanation: A visitor/outsider is somebody who is not an employee at the company and is not associated with the Company in an official capacity either.

2. Complainant

“Complainant” means an Aggrieved Person (and/or any person on behalf of the Aggrieved Person), filing a complaint under this policy, alleging Sexual Harassment at the Workplace.

An Aggrieved Person will be recognized as a Complainant only after they have submitted a copy of the complaint in writing to the IC.

3. Employee

“Employee” means a person employed with or engaged by the Company for any work on a regular, temporary, ad hoc, daily wage basis or part-time basis, either directly or through an agent, including a contractor, with or, without the knowledge of the principal employer, whether for remuneration or not, or working on a voluntary basis or otherwise, whether the terms of employment are express or implied and includes a co-worker, consultant, contract worker, probationer, trainee, apprentice, intern or called by any other such name.

Godrej Consumer Products.

4. Employer

“Employer” means the person(s) responsible for the management, supervision and control of the Company, including responsible for formulation and administration of this policy at the Company, and for the purposes of this policy, acting through the Chief Executive Officer and Chief Human Resources Officer of the Company.

5. Respondent

“Respondent” means an Employee against whom a Complainant has made a complaint of Sexual Harassment under this policy.

In an event a complaint is filed by a Godrej Consumer Products employee against a person of whom Godrej Consumer Products is not the principal employer, such complaint shall be addressed by the principal employer of the Respondent.

6. Workplace

“Workplace” includes:

- (a) offices, factories, units, branches, warehouses, or any other premises established, owned or controlled by the Company;
- (b) places visited by an Employee arising out of or during the course of employment or engagement with the Company, including but not limited to guest-houses of the Company, premises owned or controlled by retailers, distributors or any other entity with which the Company carries on business or uses as a place of operation;
- (c) off-sites, events, or programs (whether business or social or otherwise) organised or attended, by or on behalf of the Company; and/or
- (d) transportation provided by the Employer for undertaking any journey or travel for the purposes of (b) and/or (c) above.
- (e) digital modes of communication including but not limited to email, phone calls, video conferencing, SMS, and social media and communications platforms.

7. “Sexual Harassment”

Sexual harassment includes any unwanted conduct of sexual undertones which demeans, humiliates or creates a hostile and intimidating work environment.

Sexual Harassment includes any one or more of the following unwelcome acts or behaviours (whether directly and/or indirectly and/or by implication):

(a) **Physical sexual harassment-** physical contact and/or advances, touching someone without their consent, physically interfering with another's movements, or preventing another from completing their work.

(b) **Verbal sexual harassment-**making (or sharing) sexually coloured remarks, gestures or sounds, including but not limited to

(i)teasing, epithets, innuendos, jokes, pranks, comments of a sexual nature, nicknames, verbal overtures whether generic or about a person and/or their body or clothing, sexual orientation, sexual prowess, or other expressions which have a sexual connotation/overtone;

(c) **Visual sexual harassment-** showing, displaying or sharing pornography, erotic or obscene material or content including images, pictures, posters, screensavers, objects, gifts, writing on chair-table, bench, notice board, office, factory, classroom, and washroom walls signs or other material of a sexual nature or having a sexual connotation;

(d) **A demand, request or offer for sexual favours by way of-**

(i)threat or promise of employment, pay, benefits, title, position or other opportunities for advancement or training are conditioned on the submission to unwelcome sexual advances.

(ii) sexual advances of any kind involving verbal, non-verbal, or physical conduct, whether implicit or explicit, including staring, stalking, leering;

(iii) repeatedly asking to socialise after work hours, or following or contacting/attempting to contact a person repeatedly to foster personal interaction; despite a clear indication of disinterest by such person;

(iv) capturing pictures/videos for blackmail or character assassination;

(e) **Hostile work environment-** creating a hostile workplace through any conduct with sexual undertones that unreasonably interferes with an employee's work performance and/or productivity, negatively affecting their psychological safety within the workplace.

(i)asking questions about another person's sexual conduct, or sexual orientation, or volunteering information about the sexual conduct of oneself or others; and/or

(ii) any other unwelcome physical, verbal or nonverbal conduct, communication or behaviour, of a sexual nature.

Explanation:

Any of the aforesaid acts, conduct or behaviours will, for the purposes of this policy, amount to Sexual Harassment, irrespective of whether such act, conduct or behaviour was committed:

(a) in written, printed, graphic, verbal, gestural, audio-visual, virtual, electronic, or other forms,

(b) in person, or when working from home, or through any mode or channel of communication including phone calls, audio or video calls/meetings, virtual spaces, technology platforms and applications, texts, instant messaging, emails, through social media, social networking websites/applications or otherwise.

A. Further, the following circumstances, among other circumstances, if it occurs or is present in relation to or connected with any act or behaviour of Sexual Harassment (as defined in (A) above), may also amount to Sexual Harassment for the purposes of this policy:

(a) implied or explicit promise of preferential treatment in the Aggrieved Person's employment;

(b) implied or explicit threat of detrimental treatment in the Aggrieved Person's employment;

(c) implied or explicit threat about the Aggrieved Person's present or future employment status;

(d) interference with the Aggrieved Person's work or creating an intimidating or offensive or hostile work environment; and/or

(e) humiliating treatment likely to affect the Aggrieved Person's health or safety.

SECTION 3:

VI. REDRESSAL OF COMPLAINTS:

1. Constitution of the IC¹

The Company shall, through nomination by the board and by written order, constitute internal committees (each an "Internal Committee" or "IC") for each of its offices, units, premises, factories, and branches, to conduct an Inquiry into a complaint of Sexual Harassment at the Workplace and duly intimate the Central DEI Lead in the India Head Office.

¹ For the national laws on composition of IC of India refer to *Annexure 2 Table 1*

2. Membership of the IC

Wherein there is no specific provision in national law for the composition of the inquiry committee, a panel of a minimum 4 members to be appointed for conducting such an inquiry.

The composition can be as follows-

- i) Presiding officer- any senior (by age or designation) woman employee in the workplace
- ii) Additional member- two employees who are dedicated to the cause of women or gender equity.
- ii) External Member- any person of any gender who is either a qualified legal consultant with relevant experience or a person from an NGO/association dedicated to the cause of addressing sexual harassment and/or gender justice.

3. Anti Sexual Harassment Apex Committee

The Anti-Sexual Harassment Apex Committee for Godrej Industries and its associate companies will oversee the constitution, operations, and management of the individual ICs. **The members of the Apex Committee along with their contact details are listed in Annexure 3 of this policy.**

VII. FILING OF COMPLAINT

1. Limitation period for filing of complaint

A Complainant may submit the complaint of Sexual Harassment, to the IC, 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 IC may, for reasons to be recorded in writing, extend the aforesaid time period by a maximum of 3 more months, if it is satisfied that circumstances were such which prevented the Complainant from making a complaint within the original 3-month period.

In the exceptional context of complaints beyond the period of the additional 3 months, the circumstances for delay will be evaluated by the IC, and complaints routed as per their recommendations.

2. Complaint on behalf of the complainant

A complaint can be made by an Aggrieved Person and in certain special circumstances (i.e., in case of physical incapacity, mental incapacity, death or otherwise as provided in *Annexure 1* this policy) by the persons stipulated in *Annexure 1* of this policy.

3. Modes of filing a complaint

An Aggrieved Person can submit their complaint in either of the following ways:

- (i) in writing or through email to the IC
- (ii) through the online complaint-filing platform

In an event the Complainant is unable to make a written complaint, any member of the IC shall render all reasonable assistance to the Complainant for making the complaint in writing.

Along with the complaint, the Complainant must submit:

- (i) the name and details of the Respondent
- (ii) supporting documents including but not limited to email threads, message screenshots, video/audio recordings, receipts, and time stamps for CCTV recordings.
- (iii) the name and details of the witnesses, if any.

4. Filing of reply

On receipt of the complaint, the IC shall send 1 copy of the complaint (and other supporting documents, information, other details, etc., submitted by the Complainant to it) to the Respondent within 7 working days.

The Respondent shall file his/her/their reply to the complaint along with:

- (i) supporting documents including but not limited to email threads, message screenshots, video/audio recordings, receipts, and time stamps for CCTV recordings.
- (ii) the name and details of the witnesses, if any.

A copy of the response so received from the Respondent (along with supporting documents, information, other details, etc.) should be shared by

the IC, with the Complainant, immediately.

With adherence to the principles of natural justice and in the interest of transparency, any and all information disclosed by either party will be shared with the other side without alteration, deletion, or redaction.

5. Whistleblower

Any Employee with knowledge of an incident of Sexual Harassment may notify the Whistleblowing Officer of the Company by sharing details of the Aggrieved Person, the person engaging in Sexual Harassment, and any other relevant details. The contact details of the Whistleblowing Officer is listed in *Annexure 3* of this policy.

VIII. CONCILIATION

1. Initiation of Conciliation

Before initiating an Inquiry, the IC may, only at the written request of the Aggrieved Person, take steps to settle the matter between the Aggrieved Person and the Respondent through Conciliation. The IC is at liberty to exercise its discretion in determining whether a request for conciliation can be granted. If such a request is denied, IC will proceed with conducting an inquiry. No monetary settlement shall be made a basis of such Conciliation. In case the parties are willing to conciliate, the IC shall take all reasonable steps to endeavour to complete the Conciliation within a period of 14 working days from the commencement of Conciliation proceedings.

2. Settlement

Where a mutual settlement has been arrived at in accordance with *Clause VII(1)* above, the IC shall record the settlement in writing. Copies of the recorded settlement will be provided by the IC to the Aggrieved Person and the Respondent, and forwarded to the Employer to take action as specified in the recommendation of the IC.

3. No further Inquiry

Where a settlement has been arrived at in accordance with *Clauses VII(1) and VII(2)* above, no further Inquiry shall be conducted by the IC.

In an event the Aggrieved Person informs the IC that any term or condition of

the settlement has been breached or has not been complied with by the Respondent, or there are fresh allegations made against the Respondent, the IC shall proceed to make an Inquiry into the complaint.

IX. INQUIRY PROCESS

1. Initiation of Inquiry

In case:

- (a) the Aggrieved Person does not opt for Conciliation, or
- (b) the Aggrieved Person opted for Conciliation, but no settlement is reached through Conciliation, or
- (c) any term or condition of the settlement (arrived at after Conciliation) is breached or not complied with by the Respondent;
- (d) fresh allegations are made against the Respondent by the Complainant after completion of the conciliation process

the IC shall proceed to conduct an Inquiry into the complaint.

2. Manner of conducting Inquiry into the complaint

The IC shall conduct the Inquiry into the complaint in accordance with all applicable laws, including this document, and shall follow and adhere to the principles of natural justice.

This *interalia* includes giving both parties (and their witnesses) an opportunity of being heard and to present their case; allowing both parties an opportunity to cross-examine/ask questions (whether directly or put through the IC) to the other side and the witnesses; providing both parties a copy of the findings (and giving them an opportunity to make representation against the same); providing both parties a copy of the findings, recommendations and the final report of the IC; and making a reasoned report.

3. Standard of Proof

The standard of proof is that of “preponderance of probability.” Reasonable doubt has to be established that the act(s) as alleged in the complaint were committed.

4. Impact-Intent Assessment

While assessing a complaint of workplace sexual, the IC will assess the impact on and perception of the alleged act(s) by the complainant over the intent of

the respondent.

The IC shall ensure that the respect and dignity of all parties concerned are maintained during the proceedings and that the proceedings are conducted in a manner so as to ensure freedom of expression and in an atmosphere free of intimidation and free of victimization.

The Inquiry shall be conducted in the presence of a minimum of 2 members of the IC including the Presiding Officer and the External Member.²

The Complainant or the Respondent shall not be allowed to bring in any legal practitioner to represent them in their respective case, at any stage of the proceedings before the IC.

5. Interim measures during pendency of Inquiry

During the pendency of the Inquiry, on a written request made by the Complainant and if the IC deems fit, it may recommend to the Employer any of the following:

- (a) transfer of the Aggrieved Person or the Respondent to any other branch/location of the Company; and/or
- (b) allow the Aggrieved Person or the Respondent to work remotely; and/or
- (c) grant leave to the Aggrieved Person for up to a period of 3 months (such leave will be in addition to any other leaves such person would otherwise be entitled to); and/or
- (d) restrain the Respondent from reporting on the work performance of the Aggrieved Person or writing the confidential report of the Aggrieved Person, and assign the same to another officer.

Explanation:

These are intended to be temporary measures that may be recommended by the IC, while the Inquiry is ongoing, in the interests of physical and/or psychological safety and comfort of the parties to the Inquiry. Upon receiving the recommendations from the IC, the Employer shall implement the recommendations made and send a report of such implementation to the IC.

² For the national laws on minimum composition of quorum of India, refer to **Annexure 2 Table 1**

6. Termination of proceedings/Ex parte order

The IC shall have the right to terminate the Inquiry proceedings or to give an ex parte decision, in writing, on the complaint, if either of the Complainant or the Respondent fails, without sufficient cause, to present themselves for 3 consecutive hearings before the IC. However, such termination or ex parte order may not be passed without giving a written notice, 15 days in advance, to the party concerned.

7. Completion of Inquiry and IC's Report

i. Timeline for completion of Inquiry

The Inquiry by the IC is required to be completed within 90 days of the receipt of the complaint.

ii. Where allegations are not proved

Upon completion of the Inquiry, if the IC arrives at a conclusion that the allegation(s) against the Respondent has not been proved, then it shall recommend to the Employer, in writing, that no action is required to be taken in the matter.

8. Where allegations are proved³

Upon completion of the Inquiry, if the IC arrives at the conclusion that the allegation(s) against the Respondent has been proved it shall recommend, in writing, to the Employer to act against the Respondent, which may *interalia* include:

- (a) issuance of written warning;
- (b) seeking a written apology;
- (c) reprimand or censure;
- (d) withholding of increments or promotion;
- (e) termination from service;
- (f) undergoing counselling session;
- (g) carrying out community service; and/or
- (h) taking action for Sexual Harassment as a misconduct as may be prescribed under applicable laws (including service rules if any), internal

³ For the national laws on penalties in India refer to **Annexure 2 Table 2**.

policies of the Company and/or the terms of the contract with the Respondent.

9. Action for false or malicious complaint or false evidence

Where the IC arrives at a conclusion that:

- i. the allegation made by the Complainant against the Respondent is malicious, or
- ii. the Complainant has made the complaint knowing it to be false, or

- iii. the Complainant, Respondent, or any witness has produced any false evidence, forged or misleading document or false testimony, it may recommend to the Employer to take one or more of the following actions against the Complainant, Respondent or witness, as the case may be:
- (i) issuance of written warning;
 - (ii) seeking a written apology;
 - (iii) reprimand or censure;
 - (iv) withholding of increments or promotion;
 - (v) termination from service;
 - (vi) undergoing counselling sessions;
 - (vii) carrying out community service; and/or
 - (viii) taking such action as may be prescribed under applicable laws, internal policies of the Company and/or the terms of the contract with the said person;
- provided that a mere inability to substantiate a complaint or provide adequate proof need not attract action against the Complainant.

The findings mentioned in hereinabove shall be established after an Inquiry in accordance with the process prescribed before any action is recommended by the IC to the Employer in this regard.

10. Timeline for Report by the IC

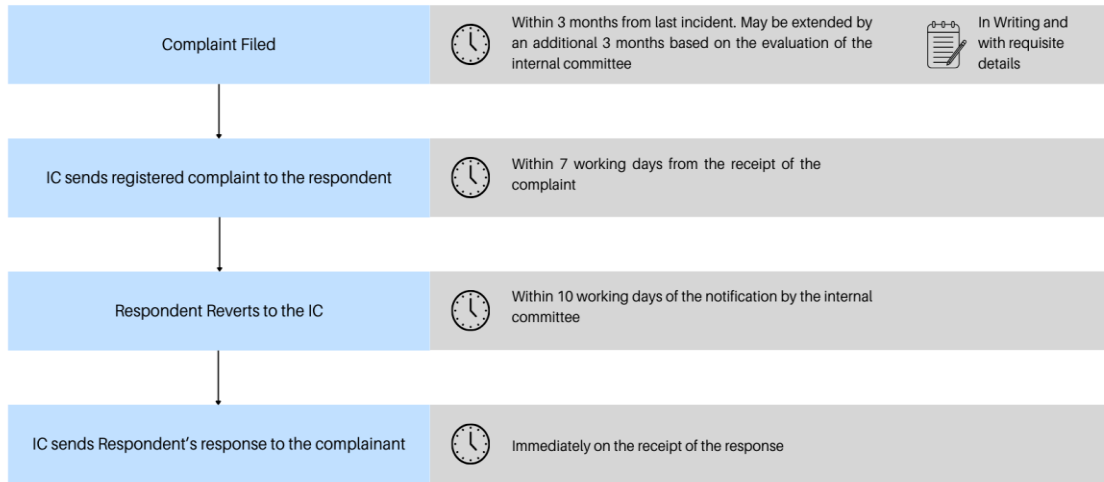
The IC shall submit a reasoned report in writing with its findings and recommendations, to the Employer within 10 days from the date of completion of the Inquiry.

11. Implementation by the Employer

Upon receipt of the recommendations of the IC (as provided above) the Employer shall promptly act upon and implement the same, and in any case no later than 60 days of receipt of the same. The Employer will also send a report evidencing implementation of such recommendations to the IC.

1

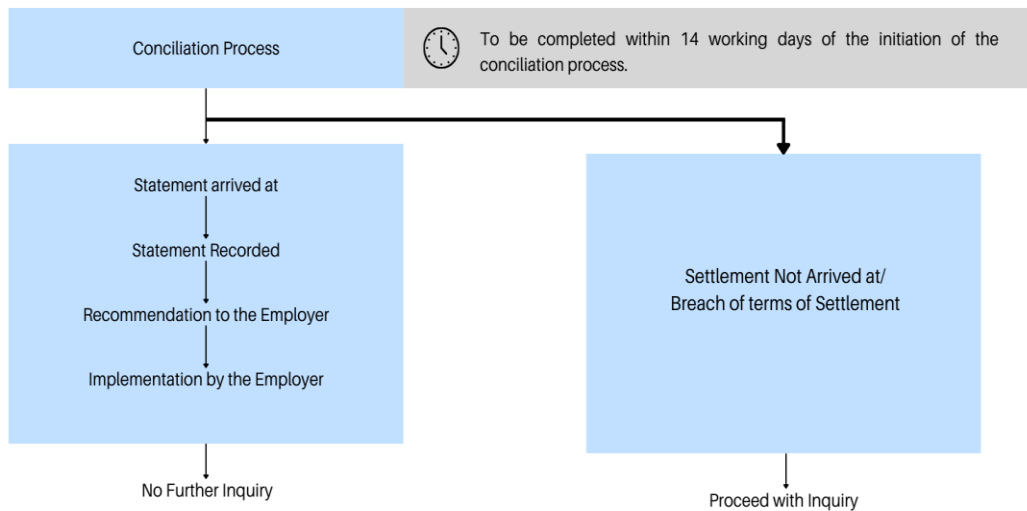
Complaint



2

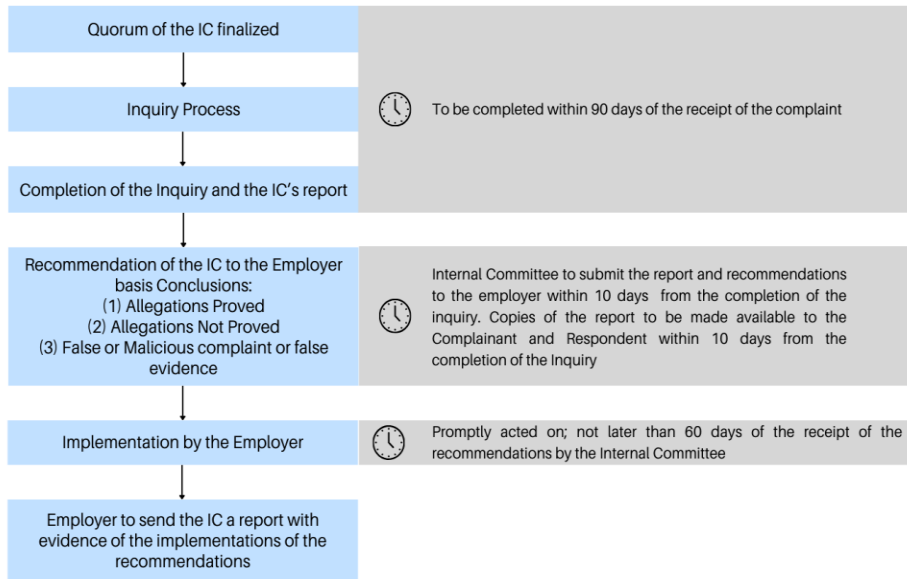
Conciliation

May take place before the inquiry if the Complainant gives it in writing



3

Inquiry



4

Appeal



X. MISCELLANEOUS

1. Confidentiality

The contents of the complaint made, the identity and addresses of the Complainant, the Respondent and witnesses, any and all information relating to Conciliation and Inquiry proceedings, findings and recommendations of the IC, and the action taken by the Employer as per the provisions of the Act and this policy shall not be published, communicated or made known to the public, press, and media in any manner. If this provision is contravened, the Employer shall be entitled to take all steps to secure confidentiality, and take all actions in accordance with the law, the Act, the Company's policies, and/or provisions of the contract with such person, for such breach and also recover from such person such sum as penalty as may be prescribed thereunder.

However, information may be disseminated regarding the justice secured to any victim of Sexual Harassment without disclosing the name, address, identity or any other particulars, which may lead to the identification of the Aggrieved Person, Respondent, the Complainant, and witnesses.

2. No Recording of Inquiry Proceedings

Any form of recording of any part of the proceedings by either party or witnesses is strictly forbidden. Only the IC will have the authority to record the proceedings for its internal records. Any attempt to record or transcribe any part of the proceedings will be considered a breach of confidentiality.

Copies of said recordings can be made available upon request in an event either party wishes to file an appeal.

3. Non-Retaliation

(a) The Company and the IC will take all reasonable measures to ensure that any person who has lodged a complaint under this policy or given evidence or other assistance as part of an Inquiry under this policy, in good faith, is protected and not subjected to any Retaliatory Conduct.

(b) If any person reporting, or testifying, or involved in the proceedings and/or Inquiry under this policy including implementation of the IC report (such as

Complainant, Respondent, witness, IC member, or otherwise) experiences any form of retaliation or victimisation in the nature of *interalia* intimidation, discrimination, pressure to withdraw from or not participate in the process, inducement to withdraw or alter their statements against their will, undue influence, threats, coercion, or any form of hostile work environment for their reporting, testifying, participating in the proceedings hereunder including implementation (hereinafter referred to as “**Retaliatory Conduct**”), then such person should promptly report the same to the IC. Any Retaliatory Conduct by an Employee violates this policy and other the Company policies, and will result in appropriate disciplinary Inquiry and action thereunder.

In an event there are concerns related to the the safety of any person reporting, or testifying, or involved in the proceedings and/or Inquiry under this policy including implementation of the IC report (such as Complainant, Respondent, witness, IC member, or otherwise) outside of the workplace, the IC will assist such person in reporting the same to concerned law and order authorities.

4. Obligations of the Employees

The Employees of the Company shall abide by the obligations and duties as prescribed under all applicable laws, the Act and this policy including as provided below:

- Familiarise themselves with the Act and this policy;
- Not encourage, engage, abet or participate in any act or behaviour that may amount to Sexual Harassment, and/or Retaliatory Conduct against any person; and
- Fully cooperate with the IC in any Inquiry or proceedings undertaken by the IC pursuant to this policy.
- In an event any employee becomes privy to any relevant information regarding an alleged incident of workplace sexual harassment, they shall be duty bound to report it to the IC for further inquiry.

5. Obligations of the Human Resources team members of the Company

- The Human Resources team members of the Company shall abide by the obligations and duties as prescribed under all applicable laws, the Act and this

policy including *interalia* as provided in this policy.

6. Obligations of the Company

- The Company shall perform its obligations and duties as prescribed under all applicable laws, the Act, and this policy including *interalia* as provided in this policy.

7. Obligations of the IC

The ICs shall perform their duties as prescribed under all applicable laws, the Act, and this policy, including *interalia* as set out below:

- Comply with all applicable laws, the provisions of Act, and this policy.
- Conduct the Inquiry into complaints relating to Sexual Harassment in a fair, diligent and expeditious manner.
- Formulate programmes for the spread of awareness of the policy among the management and employees of the Company.
- Keep a record of all complaints received and the actions taken by the IC and the Employer thereon.
- Comply with all reporting and filing requirements as may be prescribed under applicable laws and the Act, from time to time.
- Maintain confidentiality of the IC proceedings, including any and all information in relation to the contents of the complaint, the identity and addresses of the Complainant, Respondent and witnesses, the Conciliation and Inquiry proceedings, findings and recommendations of the IC, the action taken by the Company, etc.

Annexure 1: Persons who can file a complaint on behalf of an Aggrieved Person

1. In case the Aggrieved Person is unable to make a complaint on account of his/her/their physical incapacity, a complaint may be filed, with the written consent of the Aggrieved Person, by:

- (a) his/her/their relative or friend; or
- (b) his/her/their co-worker; or
- (c) any person who has knowledge of the incident.

2. In case the Aggrieved Person is unable to make a complaint on account of his/her/their mental incapacity, a complaint may be filed by:

- (a) his/her/their relative or friend; or
- (b) a Special Educator; or
- (c) a qualified psychiatrist or psychologist; or
- (d) the guardian or authority under whose care the Aggrieved Person is receiving treatment or care; or
- (e) any person who has knowledge of the incident jointly with (i) the Aggrieved Person's relative or friend or (ii) a Special Educator or (iii) a qualified psychiatrist or psychologist, or (iv) guardian or authority under whose care the Aggrieved Person is receiving treatment or care.

Explanation: For the purposes of this policy, "Special Educator" means a person trained in communication with people who need additional support that addresses their individual differences and needs.

3. In case the Aggrieved Person for any other reason is unable to make a complaint, a complaint may be filed by any person who has knowledge of the incident, with the Aggrieved Person's written Consent.

4. In case of death of the Aggrieved Person, a complaint may be filed by any person who has knowledge of the incident, with the written consent of the Aggrieved Person's legal heir(s).

Annexure 2:

Table 1: Composition of IC under National Laws

Name of the country	National law of the respective country	Relevant provision of the law
India	Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal): Repealing & Amending Act, 2016.	<p>The Presiding Officer should be a woman employed at a senior level at the workplace from amongst the employees.</p> <p>The Members should not be:</p> <ul style="list-style-type: none"> - less than 2 members from amongst employees, - preferably committed to the cause of women or who have had experience in social work or have legal knowledge. <p>i. Not less than half of the IC Members shall be women,</p> <p>ii. The term of the IC Members shall not exceed 3 years</p> <p>iii. A minimum of 3 Members of the IC, including the mandatory presence of the Presiding Officer and the External Member, are required for conducting the inquiry.</p>

Table 2: Penalties under National Laws

Name of the country	National law of the respective country	Relevant provision of the law
India	Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 ("POSH Act")	<p>S.13(3) Where the Internal Committee or the Local Committee, as the case may be, arrives at the conclusion that the allegation against the respondent has been proved, it shall recommend to the employer or the District Officer, as the case may be—</p> <p>(i) to take action for sexual harassment as a misconduct in accordance with the provisions of the service rules applicable to the respondent or where</p>

		<p>no such service rules have been made, in such manner as may be prescribed;</p> <p>(ii) to deduct, notwithstanding anything in the service rules applicable to the respondent, from the salary or wages of the respondent such sum as it may consider appropriate to be paid to the aggrieved woman or to her legal heirs, as it may determine, in accordance with the provisions of section 15:</p> <p>Provide that in case the employer is unable to make such deduction from the salary of the respondent due to his being absent from duty or cessation of employment it may direct to the respondent to pay such sum to the aggrieved woman: Provided further that in case the respondent fails to pay the sum referred to in clause (ii), the Internal Committee or as, the case may be, the Local Committee may forward the order for recovery of the sum as an arrear of land revenue to the concerned District Officer.</p> <p>(4) The employer or the District Officer shall act upon the recommendation within sixty days of its receipt by him.</p>
--	--	---

Annexure 3: IC Members for Godrej Consumer Products

Head Office, Mumbai, India

IC Member	Contact details
Reena Bibals (Presiding Officer)	reena@godrejcp.com
Samir Suryawanshi	samir.suryawanshi@godrejcp.com
Garima Singh	garima.singh02@godrejcp.com
Saurabh Jhavar	saurabh.jhavar@godrejcp.com
Vandana Lisa. Scolt	vandana.scolt@godrejcp.com
Sandhya Ramesh	sandhya.ramesh@godrejcp.com
Varsha Verghese	Varsha.Verghese@godrejcp.com

Rutuja Shinde (External member)	rutuja@theoutcastcollective.com
Asha Vincent	asha.vincent@godrejcp.com
Dhivya Parthiban	dhivya.parthiban@godrejcp.com
Neeraj S	neeraj.s@godrejcp.com
Harshita Bhat (Presiding Officer)	harshita.bhat@godrejpct.com
Robert Menzies	robert.menzies@godrejpct.com
Chirag Aga	chirag.aga@godrejpct.com
Harsh Vora	harsh.vora1@godrejcp.com

South Region, India- Sales

IC Member	Contact details
Asha Vincent (Presiding officer)	asha.vincent@godrejcp.com
Prasannaa Murli	prasannaa.murli@godrejcp.com
J Durga Prasad	jd.prasad@godrejcp.com
M Venkat Reddy	venkat.reddy@godrejcp.com
Garima Singh	garima.singh02@godrejcp.com
Bhavya Garg	bhavya.garg@godrejcp.com
Kriti Bhatia	kriti.bhatia@godrejcp.com
Vandana Lisa. Scolt	vandana.scolt@godrejcp.com
Sandhya Ramesh	sandhya.ramesh@godrejcp.com
Amit Sindhupe	amit.sindhupe@godrejcp.com
Rutuja Shinde (External member)	rutuja@theoutcastcollective.com
Dhivya Partibhan	dhivya.parthiban@godrejcp.com
Neeraj S	neeraj.s@godrejcp.com
Harsh Vora	harsh.vora1@godrejcp.com

East Region, India

IC Member	Contact details
Asha Vincent (Presiding officer)	asha.vincent@godrejcp.com
Krishna Khatwani	krishna.khatwani@godrejcp.com
Param Mohapatra	param.mohapatra@godrejcp.com
Garima Singh	garima.singh02@godrejcp.com
Bhavya Garg	bhavya.garg@godrejcp.com
Vandana Lisa. Scolt	vandana.scolt@godrejcp.com
Yashvi Kumar	yashvi.kumar@godrejcp.com
Sandhya Ramesh	sandhya.ramesh@godrejcp.com
Rutuja Shinde (External member)	rutuja@theoutcastcollective.com
Dhivhya Partibhan	dhivya.parthiban@godrejcp.com
Neeraj S	neeraj.s@godrejcp.com
Harsh Vora	harsh.vora1@godrejcp.com

West Region, India

IC Member	Contact details
Asha Vincent (Presiding officer)	asha.vincent@godrejcp.com
R Sankara Narayanan	sankara.narayanan@godrejcp.com
Shashi Ranjan	shashi.ranjan@godrejcp.com
Garima Singh	garima.singh02@godrejcp.com
Bhavya Garg	bhavya.garg@godrejcp.com
Vandana Lisa. Scolt	vandana.scolt@godrejcp.com
Syrina D'souza	syrina.dsouza@godrejcp.com
Sandhya Ramesh	sandhya.ramesh@godrejcp.com
Rutuja Shinde (External member)	rutuja@theoutcastcollective.com
Dhivhya Partibhan	dhivya.parthiban@godrejcp.com
Neeraj S	neeraj.s@godrejcp.com
Harsh Vora	harsh.vora1@godrejcp.com

North Region, India

IC Member	Contact details
Asha Vincent (Presiding officer)	asha.vincent@godrejcp.com
R Sankara Narayanan	sankara.narayanan@godrejcp.com
Garima Singh	garima.singh02@godrejcp.com
Arvind Midha	arvind.midha@godrejcp.com
Bhavya Garg	bhavya.garg@godrejcp.com
Vandana Lisa. Scolt	vandana.scolt@godrejcp.com
Sandhya Ramesh	sandhya.ramesh@godrejcp.com
Dhivhya Partibhan	dhivya.parthiban@godrejcp.com
Neeraj S	neeraj.s@godrejcp.com
Rutuja Shinde (External member)	rutuja@theoutcastcollective.com
Aakriti Jain	aakriti.jain@godrejcp.com
Harsh Vora	harsh.vora1@godrejcp.com

North East Cluster, India

IC Member	Contact details
Reena Bibals (Presiding Officer)	reena@godrejcp.com
Barnali Hazarika	barnali.hazarika@godrejcp.com
Vinayak Kamat	vinayak@godrejcp.com
Jyotsna Edlin	jyotsna.edlin@godrejcp.com
Jagadeesh M	jagadeesh@godrejcp.com
Sandhya Ramesh	sandhya.ramesh@godrejcp.com
Laxmi Devi	laxmi.devi@godrejcp.com
Vandana Lisa. Scolt	vandana.scolt@godrejcp.com
Rutuja Shinde (External member)	rutuja@theoutcastcollective.com

Arundhati Sahoo	arundhati.sahoo@godrejcp.com
-----------------	------------------------------

South Cluster, India

IC Member	Contact details
Reena Bibals (Presiding Officer)	reena@godrejcp.com
Mugdha Niphadkar	mugdha.niphadkar@godrejcp.com
Arundhati Sahoo	arundhati.sahoo@godrejcp.com
M Sugumar	sugumar@godrejcp.com
Jyotsna Edlin	jyotsna.edlin@godrejcp.com
Jagadeesh M	jagadeesh@godrejcp.com
Vandana Lisa. Scolt	vandana.scolt@godrejcp.com
Sandhya Ramesh	sandhya.ramesh@godrejcp.com
Rutuja Shinde (External member)	rutuja@theoutcastcollective.com
Sandhiyan Thilagavathy (EM)	r.sandhiyan@gmail.com

Central West Cluster, India

IC Member	Contact details
Reena Bibals (Presiding Officer)	reena@godrejcp.com
Poonam Chaurasia	poonam.chaurasia@godrejcp.com
Abdul Samad	abdulsamad@godrejcp.com
Abhishek Priyadarshi	abhishek.priyadarshi@godrejcp.com
Jyotsna Edlin	jyotsna.edlin@godrejcp.com
Jagadeesh M	jagadeesh@godrejcp.com
Vandana Lisa. Scolt	vandana.scolt@godrejcp.com
Arundhati Sahoo	arundhati.sahoo@godrejcp.com
Sandhya Ramesh	sandhya.ramesh@godrejcp.com
Rutuja Shinde (External member)	rutuja@theoutcastcollective.com

North Cluster, India

IC Member	Contact details
Reena Bibals (Presiding Officer)	reena@godrejcp.com
Arundhati Sahoo	arundhati.sahoo@godrejcp.com
Sandesh Borwankar	sj.borwankar@godrejcp.com
Jyotsna Edlin	jyotsna.edlin@godrejcp.com
Jagadeesh M	jagadeesh@godrejcp.com
Vandana Lisa. Scolt	vandana.scolt@godrejcp.com
Sandhya Ramesh	sandhya.ramesh@godrejcp.com
Barnali Hazarika	barnali.hazarika@godrejcp.com
Rutuja Shinde	rutuja@theoutcastcollective.com

Anti Sexual Harassment Apex Committee Members for Godrej Industries and associate companies

IC Member	Contact details
Nisaba Godrej (Executive Chairperson, Godrej Consumer Products Limited)	nisaba.godrej@godrejcp.com
Sumit Mitra (Head - Group HR and Corporate Services, Godrej Industries Limited)	su.mitra@godrejinds.com
Divya Murthy (Head - Group Legal, Godrej Industries Limited)	divya.murthy@godrejinds.com
Vandana Scolt (Head - Leadership Development and Employer Brand Godrej Industries Limited) - Coordinator	vandana.scolt@godrejcp.com
Parmesh Shahani (Head - Godrej DEI Lab, Godrej Industries Limited)	parmesh.shahani@godrejinds.com

Whistleblowing Officer

Whistleblowing Officer	Contact details
V Swaminathan	Email address: ve.swaminathan@godrejinds.com Postal address: Godrej One, Pirojshanagar, Eastern Express Highway, Vikhroli East, Mumbai - 400079, Maharashtra, India Telephone number: +91-022-25194403 +91-9819825526

Transgender Person Complaints Officer

Complaints Officer	Contact details
Sandhya Ramesh	sandhya.ramesh@godrejcp.com