

Prevention of Sexual Harassment Policy

Gati & Allcargo Supply Chain Private Ltd Legal & Compliance

Last updated: August 8, 2023

(For internal and authorised use only)

Objective

Gati and AllCargo Supply Chain Pvt Ltd (“Gati & ASCPL ” or “Company”) is committed to creating and maintaining a secure work environment where it’s employees, agents, vendors and partners can work and pursue business together in an atmosphere free of harassment, exploitation and intimidation caused by acts of Sexual Harassment within but not limited to the office premises and other locations directly related to the Company’s business.

The objective of this policy is to provide protection against sexual harassment of women at workplace and for the prevention and redressal of complaints of sexual harassment and for matters connected therewith.

All concerned should take cognizance of the fact that Gati & ASCPL strongly opposes sexual harassment, and that such behaviour against women is prohibited by the law as set down in The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and Rules framed thereunder, (hereinafter referred to as “Act”) as well as the terms of employment. Commission of any act of sexual harassment as defined in the Act and in this Policy shall result in strict disciplinary action.

At Gati & ASCPL, the Company have zero-tolerance for sexual harassment. The Company value each employee working with the Company and wish to protect their dignity and self-respect. In doing so, the Company is determined to promote a working environment in which persons of both genders complement each other as equals in an environment that encourages maximum productivity and to keep the personal dignity.

We at Gati & ASCPL are committed towards giving every employee a just and fair hearing on issues encountered by them at the workplace with special attention to sexual harassment. Gati & ASCPL will take very serious disciplinary action against any victimization of the employee who is complaining or the alleged harasser that may result from a complaint.

Guidelines

Effective Date	8 th August 2023
Version Number	1.0
Date last changed	6 th August 2024
Next Review	1 st April 2025
Determining Authority in case of requirement	Chief Human Resource Officer

Head	Guidelines
Eligibility	This policy is applicable to all the Gati & ASCPL (both contractual and on roll) of Gati & ASCPL based at any location of the company, this includes group companies whether in India or abroad. Gati & ASCPL encourages every employee who believes they are sexually harassed to use the redressal mechanism as provided in this policy.
Definition	<p>Aggrieved Person” means a person in relation to workplace whether employed or not, who alleges to have been subject to any act of sexual harassment by the Respondent.</p> <p>“Company” means Gati & ASCPL.</p> <p>“employee/ Gati & ASCPL” means a person employed at a workplace for any work on regular, temporary, ad hoc or daily wages 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, a contract worker, probationer, trainee, apprentice or called by any other such name;</p> <p>“Internal Complaints Committee” means a committee constituted by Company as per this Policy.</p> <p>“Respondent” means a person against whom the aggrieved person has made a complaint.</p> <p>“Sexual Harassment” includes any unwelcome sexually determined behaviour (direct or implied), such as physical contact, advances or invitations, demand or request for sexual favour, sexually coloured remarks, showing pornography, creating a hostile work environment and any other unwelcome “Sexually determined Behaviour” (Physical, verbal or non-verbal conduct) of a sexual nature.</p> <p>“Sexual Harassment” would also mean direct or implied request or offers by any employee for sexual favours in exchange for actual or promised job benefits such as favourable reviews, salary increases, promotions, increased benefits or continued employment.</p> <p>Other sexual oriented behaviour, whether it is intended or not to be offensive, which is unwelcome and has effect of creating a work environment which is offensive, intimidating or humiliating to Gati & ASCPL.</p> <p>Creating a “Hostile work environment” includes:</p> <p>Creating a workplace where sexual harassment may go unheard, where despite complaints no action is taken, where discriminatory job assignments are encouraged, where there is nexus between the accused and higher management and where the complainant may be placed under fear, disadvantage or threat of victimization.</p> <p>“Workplace” includes any department, organization, undertaking, establishment, enterprise institution, and office or branch unit. Any place visited by the employee arising out of or during employment including transportation provided by the employer for undertaking such journey.</p>
Preventive Action	The company will take reasonable steps to ensure prevention of sexual harassment at work which may include circulating applicable policies and other relevant information to all Gati & ASCPL, including all new joiners.
Internal Complaint Committee (“IC”)	The company will have a centralized redressal committee (i.e. Internal Complaint Committee “IC”), setup to specifically address any complaints of sexual harassment. IC will be nominated by the CHIEF HR and would be headed by a female Gati & ASCPL. Not less than three fourth of the members would be female Gati & ASCPL. While the centrally nominated members will review all cases of sexual harassment reported with the company, on case-to-case basis, respective EDC – HR would also be involved. Besides handling complaints on sexual harassment, the committee will also co-ordinate

to create a sexual harassment free atmosphere.

IC members & HR representatives will be provided with the necessary training inputs to handle such issues effectively and with the required sensitivity.

Filing of complaint

Every complaint received shall be forwarded to IC formed under the policy for redressal. The investigation shall be carried out by IC constituted for this purpose. If any employee believes that he/she has been subjected to sexual harassment, such person may file a complaint in writing with any member of the IC or send mail to POSH@allcargologistics.com which is the "Redressal Committee at Gati & ASCPL", within 3 months from the date of incident and in case of a series of incidents, within a period of 3 months from the date of last incident, which may be extended for a further period of 3 months, if circumstances warrant such extension in the opinion of the IC, for reasons to be recorded in writing.

On receipt of complaint, the IC shall decide the place and time for hearing the complaint and shall intimate the date, time and place of hearing to the Complainant and Respondent. The IC shall follow the principle of Natural Justice while handling such complaints.

Where the aggrieved person is unable to make a complaint on account of their physical, mental incapacity, a complaint may be filed by a) a relative or friend; or b) a co-worker; c) a special educator' or d) a qualified psychiatrist or psychologist; or e) the guardian or authority under whose care they are receiving treatment or care; or f) any person who has knowledge of the incident jointly with any of the above.

Where the aggrieved person is dead, a complaint may be filed by any person who has knowledge of the incident, with the written consent of their legal heir.

The committee will ensure confidentiality during the inquiry process and will ensure that while investigating a complaint: Both parties will be given reasonable opportunity to be heard along with witnesses and to produce any other relevant documents.

On receipt of any complaint, IC shall provide a copy along with supporting documents of such complaints to the Respondent within 7 working days. Respondent shall file a reply within 10 working days of receipt of the complaint along with a list of documents, names and addresses of witnesses.

IC shall investigate in detail the matter of the complaint. The IC shall have the right to call the person against whom the complaint is made or any other witnesses when necessary and prepare an enquiry report with recommendations within three weeks of the complaint being filed.

IC shall have the right to terminate the enquiry or give ex-parte decision on the complaint, if the Respondent or complainant remains absent for 3 consecutive hearings, without sufficient cause, provided that such termination or ex-parte Order may not be passed without giving 15 days' notice in writing, to the concerned party. The IC must complete its investigation within a period of 90 days from the date of complaint.

The IC may, before initiating an inquiry, and at the aggrieved person's request, attempt to settle the matter through conciliation. However, IC shall ensure that:

- a) Monetary settlement will not be made as a basis of conciliation.
- b) Where a settlement has been reached, the settlement terms shall be signed by both the parties and shall be provided with a copy of it.

Where, a settlement is arrived as mentioned hereinabove, no further enquiry shall be

conducted by the IC.

The IC may during such investigation exercise the power of a civil court, vested in it, in respect of:

- a) summoning and enforcing the attendance of any person and examining him under oath.
- b) requiring discovery and production of documents.
- c) any other prescribed matter.

During such enquiry, upon written request by the aggrieved person, the committee may at its discretion recommend:

- a) to transfer the aggrieved person or the respondent to any other workplace.
- b) grant leave to the aggrieved person of up to three months which is in addition to leave to which she is otherwise entitled.

Provided, the aggrieved person must tender justified reason for such transfer or leave, such as threat to work in the workplace.

Upon completion of the investigation, both parties will be informed of the results of the investigation.

Once the investigation is completed, the validity of the harassment allegations needs to be checked. If it is determined that the harassment occurred, prompt remedial action will be taken. The committee will share the investigation details with HR and recommend disciplinary action.

HR will take appropriate disciplinary action, up to and including termination against the accused. If the Internal Complaints Committee arrives at the conclusion that the allegation against the respondent has been proved, or if such complaint is proved to be false or malicious, it shall recommend taking action for sexual harassment as misconduct, as per the following punishment matrix.

Penalty matrix	Disciplinary action
Minor	Warning, Reprimand, Written apology to the Complainant
Moderate	Withholding of promotions / increments, rescinding of bonus, Carrying out community service, Transfer from present location
Stringent	Compensation or deduction from the salary / wages of the respondent or; issue direction for payment; such sum as it may consider appropriate to be paid to the aggrieved person or to their legal heirs, as it may determine, Suspension, Termination / dismissal from employment. Legal action under the Criminal Code

The anti-sexual harassment policy shall not, however be used to raise malicious complaints. If a complaint has been made in bad faith, or false or forged or misleading documents, as demonstrated by clear and convincing evidence, disciplinary action which may include, termination will be taken against the person who raised the complaint. A mere inability to substantiate a complaint or provide adequate proof would not attract action as provided herein. A similar recommendation for taking action would be recommended against any witness whom the IC concludes that he/she has given false evidence or produced forged or misleading documents.

It is to be noted that this statement is not intended to discourage employees from coming forward with any complaints. Gati & ASCPL recognizes and expects that some claims may be difficult to prove or support or may not in fact be found to raise to the

	<p>level of seriousness deemed necessary to constitute Sexual Harassment. These types of complaints will not be considered to be false accusations.</p> <p>Company may make any alteration or amendment or rescind any of the clauses of this Policy as and when it finds it necessary to do so as long as it complies with the Act. Any such alterations or amendment or rescinding will be intimated to the employee.</p> <p>Nothing contained in policy shall operate in derogation of any law for the time being in force or to the prejudice of any right of any employee under any other Rules or Law.</p> <p>The IC shall prepare an annual report with the following details and shall submit the same to the Company to include in its Annual report:</p> <ol style="list-style-type: none"> Number of complaints of sexual harassment received during the year; Number of complaints disposed off during the year; Number of cases pending for more than 90 days; Number of workshops or awareness program against sexual harassment carried out; Nature of action taken by the employer. <p>The above Annual Report and the MIS should be prepared by the Human Resources Department and shall be submitted before the end of a financial year to the Senior Management of the Company.</p> <p>Complaints relating to Sexual Harassment shall be handled and investigations will be conducted under the principles of natural justice, basis of fundamental fairness, in an impartial and confidential manner so as to protect the identity of all viz., the person bringing the charge, potential witnesses, and the person accused of improper behaviour. Also, all efforts shall be taken to ensure objectivity and thoroughness throughout the process of investigation.</p> <p>The identity and address of the aggrieved person, respondent and witnesses must not be published or disclosed to the public or media.</p> <p>The decision of the Company shall be final and binding on all. However, the same is without prejudice to any recourse that Company or the individual concerned may have against the respondent and it shall not limit or restrict the rights of the Complainant and/or Company to pursue, nor shall they be precluded from pursuing, such further and other legal actions as may be available.</p>
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INTERNAL COMMITTEE:

IC - HO				
S.No.	NAME	DESIGNATION	EMAIL ID	MOBILE NO
1	P V Padma Kumar	Head - BDFS	padmakumar.pv@allcargologistics.com	8008559746
2	Razia Sultana	DGM - HR	razia.sultana@allcargologistics.com	8008559736
3	Sharmista Majumdar	Head - Customer Experience	sharmistha.majumdar@allcargologistics.com	9311978391
4	Karuna Kamath	Head-Talent Acquisition	karuna.kamath@allcargologistics.com	8008646767
5	Karan Purohit Singh	Head- Legal	karan.purohit@allcargologistics.com	9594932421
6	Vinod Sonawane	Head - Industrial Relations and Compliance	vinod.sonawane@allcargosupplychain.com	9820036003
7	Pramila Karkera	Deputy General Manager - Business Excellence	pramila.karkera@allcargosupplychain.com	9867160460
9	Kamal Damania	External committee member	kamal@lightoflifetrust.org	9821399002

Ms. Kamal B. Damania is a consultant and is a Member of IC

IC - WEST ZONE

S.No.	NAME	DESIGNATION	EMAIL ID	MOBILE NO
1	Anamika Rahul Tambat	Unit Head GDW	anamika.tambat@allcargologistics.com	7738372220
2	Bharati Dhuri	Key Account Manager	bharati.dhuri@allcargologistics.com	8600899982
3	Dattaraj Dayal Shirwadkar	Zonal Manager - Legal	dattaraj.shriwadkar@allcargologistics.com	9819508263
4	Ajay Vijay Bale	Zonal Business HR Manager	ajay.bale@allcargologistics.com	9619412916
5	Noopura Deshpande	Business HR	noopura.deshpande@allcargologistics.com	9702006758

IC - NORTH ZONE

S.No.	NAME	DESIGNATION	EMAIL ID	MOBILE NO
1	Sonia Garg	National Network Manager	sonia.garg@allcargologistics.com	8800792269
2	Leena Mehra	Manager - Internal Audit	leena.mehra@allcargologistics.com	9311686111
3	Maninder Kaur	Key Account Manager	maninder.kaur@allcargologistics.com	9154983406
4	Kamal Kant Virthare	Zonal Business HR Manager	kamal.virthare@allcargologistics.com	9897238666
5	Sandeep Raj Roy	Zonal Manager - Legal	sandeepraj.roy@allcargologistics.com	8882355795
6	Pallavi Saxena	Unit Head GDW	pallavi.saxena@allcargologistics.com	8527110271
7	Mayank Narula	Regional Operations Manager	mayank.narula@allcargosupplychain.com	6479842218

IC - SOUTH ZONE

S.No.	NAME	DESIGNATION	EMAIL ID	MOBILE NO
1	Cindrella Anthony	Zonal Business HR	cindrella.anthony@allcargologistics.com	9561011704
2	Saswati Mohanty	Zonal HR – Contract Logistics	saswati.mohanty@allcargologistics.com	7625014306
3	Gadikhana Susheela	ATC Business and Operations Manager	susheela.gadikhana@allcargologistics.com	6303835939
4	Kavitha Rama Murthy	Sr. Manager – Business Development	kavitha.murthy@allcargosupplychain.com	9916323279
5	Sreekala U	Manager - Franchisee Partner and Ground Operations	sreekala.u@allcargologistics.com	8008400942
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8	Sai Kumar	Regional Operations Manager	A.Saikumar@allcargosupplychain.com	9052349633

IC - EAST ZONE

S.No.	NAME	DESIGNATION	EMAIL ID	MOBILE NO
1	Amit Pandey	Zonal Business HR	pandey.amit@allcargologistics.com	7410067581
2	Trisha Singha Roy	Business HR	trisha.roy@allcargologistics.com	8910807264
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5	Gangesh Kumar Mishra	Regional Operations Manager	gangeshkumar.mishra@allcargosupplychain.com	8420255214

ADVISORY COMMITTEE:

Sl. No.	Name	Designation	Mail ID
1	Mr. Mehernosh Mehta	Chief HR	mehernosh.mehta@allcargosupplychain.com
2	Mr. Bhardwaj Pandya	Group Legal Head	Bhardwaj.pandya@allcargologistics.com
3	Ms. TS Maharani	Company Secretary & Compliance Officer	maharani.ts@allcargosupplychain.com