SEXUAL HARASSMENT REDRESSAL POLICY | Prevention of Sexual Harassment at Workplace

INTRODUCTION

In line with the provisions of Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act 2013 and rules 2013 framed thereunder and our Code of Conduct, the 'Sexual Harassment Redressal Policy' – Guidelines for Lenskart intends to help maintain a safe, secure and friendly and enabling workplace for women employees and provide a working environment free from any harassment and to effectively deal with any complaints that may arise.

This policy applies to all employees of **Lenskart Solutions Limited**, its subsidiaries, affiliates, joint ventures, and group entities (collectively referred to as **'Lenskart Group'** or **'the Company'**). The protection and obligations under this policy extend across all group entity workplaces, operating locations, client sites, company-provided transport, official events, and virtual communication channels

RESPONSIBILITY

This Policy comes into effect immediately. Individual Managers are responsible for ensuring that this policy is enforced within their own area of function.

This policy is formulated by the Human Capital Department. The Human Capital Department has the responsibility for ensuring the maintenance, regular review and updating of the policy. Any queries on the application or interpretation of this policy must be discussed with the Human Capital Department.

WHAT IS SEXUAL HARASSMENT?

Sexual harassment is any verbal, non-verbal or physical behavior of a sexual nature by one person or group of persons which a female employee finds unwelcome or offensive and includes the use of offensive visual or written material. It is persistent or serious enough to have a detrimental effect on the employee.

Sexual harassment may occur not only where a person uses sexual behavior to control, influence or affect the career, salary or job of another person, but also between co-workers. It may also occur between a Lenskart employee and someone that employee deals with in the course of his/her work who is not employed by the Company.

Clearly, the same behavior may have a different impact on different individuals. Therefore, courtesy, common sense and sensitivity should prevail in all workplace situations.

"Sexual Harassment" would mean and include the following:

- Any unwelcome sexually determined behavior, or pattern of conduct, that would cause discomfort and / or humiliate a female employee at whom the behavior or conduct was directed that includes one or more of the following:
- Physical contact and advances;
- Sexually colored remarks or remarks of a sexual nature about a person's clothing or body;
- Showing pornography, making or posting sexual pranks, sexual teasing, sexual jokes, sexually demeaning or offensive pictures, cartoons or other materials through email, SMS, MMS etc.;
- Demand or request for sexual favors;
- Repeatedly asking to socialize during off-duty hours or continued expressions of sexual interest against a person's wishes;
- Giving gifts or leaving objects that are sexually suggestive;
- Eve teasing, innuendos and taunts, physical confinement against one's will or any such act likely to intrude upon
  one's privacy;
- Persistent watching, following, contacting of a person;
- Any other unwelcome physical, verbal or non-verbal conduct of sexual nature;

Conduct of sexually determined acts, which may contain:

- An implied or overt promise of preferential treatment; or
- An implied or overt threat of detrimental treatment
- An implied or overt threat about the present or future employment status of a person including the creation of a hostile working environment; or
- An interference with the person's work or creating an intimidating or offensive work environment; or
- Any conduct which may be humiliating and may constitute a health and safety problem.

This is only an indicative list of the possible acts, which could be treated as sexual harassment and is not exhaustive in nature. Employees may refer to the "Code of Conduct" of the Company to know more about acceptable code of conduct in Lenskart.

SCOPE OF THE POLICY

A person employed at the workplace, for any work on regular, temporary, ad-hoc or daily wage basis, either directly or through an agent, including a contractor, 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 contract worker, probationer, trainee, apprentice or by any other name called. The scope of policy is applicable but not restricted for all to the following: Business/ operating locations of the company.

Any external location visited by employees due to or during the course of their employment with the company such as business locations of other companies, guest houses etc. Any mode of transport provided by the company for undertaking a journey to and from the aforementioned locations. Conversations or connects with employees on virtual meeting platform when working remotely or from home

RESPONSIBILITIES OF INDIVIDUALS

It is the responsibility of all to respect the rights of others and to never encourage harassment. It can be done by:

- Every employee is duty bound to notify any incident which is against the modesty of a female employee and warn or advise for stopping the same.
- Refusing to participate in any activity which constitutes harassment.
- Supporting a female employee to reject unwelcome behavior.
- Acting as a witness if the female employee being harassed decides to lodge a complaint. All are encouraged to advise others of behavior that is unwelcome. Often, some behaviors are not intentional, while this does not make it acceptable, it does give the person who is behaving inappropriately, such persons may be given the opportunity to modify their behavior or stop what they are doing.

RESPONSIBILITIES OF MANAGERS

All Managers must ensure that no female employee is subjected to Sexual Harassment and there is equal treatment. They must also ensure that all the staff understands that harassment will not be tolerated; that complaints will be taken seriously; and that the person who makes a complaint, persons against whom complaint is lodged, or witnesses are not victimized in any way.

APPROACHING A CASE OF SEXUAL HARASSMENT SELF – HELP AND INFORMAL INTERVENTION

The Company encourages any female employee experiencing unwelcome behavior to make it clear immediately to the person responsible that such behavior is offensive and request that it shall be stopped.

A female employee, who is unable to confront or where the offensive conduct persists even after making it clear, the female employee should approach her Line Manager to intervene who should take immediate steps to stop unwelcome behavior. If required by Line Manager, HC Manager can provide facilitation.

The decision to keep the complaint at 'Self Help' level or at 'Informal Intervention' level is entirely Up to the female employee concerned and the Company respects that right.

REDRESSAL MECHANISM – FORMAL INTERVENTION

If Self-help or any informal intervention has not worked or allegation is, in the complainant's view, serious enough to warrant formal Intervention, the complainant should lodge a written complaint, which shall be followed by a formal redressal mechanism as described in this Policy guideline. In case of a verbal complaint, the complaint will be made in writing by the receiver of the complaint and signatures of the complainant will be obtained. The complaint should be made immediately from the date of alleged offense or within 90 days of the issue, provided the complainant submits sufficient cause for such delay.

REDRESSAL COMMITTEE

Lenskart has constituted Internal Complaint Committee (ICC) to specifically address complaints of Sexual Harassment. The ICC has been constituted keeping in mind the guidelines issued by government of India as applicable under "The Sexual Harassment of Women at the Workplace – Prevention, Prohibition and Redressal Act- 2013". A detail of ICC members are mentioned in Annexure 1 of the policy.

The presiding officer/ chairperson along with other members shall hold office for a period of three years from the date of nomination or till the end of employment whichever is earlier.

In addition to handling complaints of sexual harassment, the committees will also co-ordinate preventive measures to create harassment free work environment.

Members/member will be disqualified from committee: -

- If he/she found guilty in any disciplinary proceedings or
- In case of a complaint being made against the member only.
- If it's proven that a member is misusing his/her authority as ICC representative.

PREVENTIVE MEASURES

As a preventive step management shall ensure: -

- All employees of Lenskart either during induction or during the course of the employment shall undergo training on prevention of sexual harassment and related policy; Human resources shall intimate the employees on their respective schedule for the said training.
- Display penal consequences of sexual harassment at all prominent locations.
- Treat sexual harassment as misconduct under service rules.

COMPLAINT RESOLUTION PROCESS

If any women employee believes that she has been subjected to sexual harassment, such person may file a complaint with any member of the committee or send an email to POSH@lenskart.in The process can be as follows, though not limited to:

- Complaints need to be made in writing (6 copies), where such a complaint cannot be made in writing, any member of the ICC shall assist the women in drafting the complaint.

- Employees may use the format given in annexure 2 to file a complaint with ICC.

- Complaints must be made immediately or within 3 months from the last incident of harassment,

provided the complainant submits sufficient cause for such delay. An extension in this regard can be given provided aggrieved can prove mental/physical inability to make a complaint within stipulated time limit. Also, a legal heir can make a complaint on behalf of the aggrieved if mental or physical inability is substantiated.

- The committee shall hold a first meeting with the complainant within 5 working days of receiving the complaint.
- A detailed statement of allegation shall be handed over to the respondent within 7 working days.
- The committee then shall organize hearings with both the parties involved. · The ICC shall take testimonies and evaluate other submitted proof and evidence wherever necessary.
- During the inquiry process, both the parties involved would be expected to refrain from any form of threat or intimidation.
- ICC will conduct enquiry in accordance with the principles of natural justice i.e both parties involved shall get due opportunity to put their point across.
- Both parties including ICC members shall ensure confidentiality during the inquiry process.
- ICC shall complete the enquiry within 90 days of receiving the complaint and shall table their recommendation to management within 10 days of finishing the inquiry. Management shall in turn take final action on recommendation within 60 days.
- If in case a complaint is received against any ICC member, he or she will cease to be part of ICC from immediate effect and re-induction in ICC will happen only once the investigation is complete wherein he/she is proven not guilty.

RECONCILIATION PROCESS

The ICC on the request and consent of aggrieved can attempt reconciliation before starting the inquiry. Monetary settlement cannot be made basis of conciliation. Where settlement is arrived, no further inquiry shall be conducted.

DECISION

Once the investigation is completed, a determination will be made regarding the validity of the harassment allegations. If it's established that harassment has occurred; prompt disciplinary action shall be taken, such disciplinary action may include though not limited to transfer, demotion, deduction of salary or termination from services.

INTERIM RELIEF TO COMPLAINANT

During the pendency of an inquiry, on a written request made by the complainant, the committee may recommend to the management to transfer the complainant or person accused to any other location of work or grant leave to the complainant for such period as may be considered reasonable by ICC, which is over and above the entitled leave or grant such other relief to complainant as may be prescribed in service rules.

FALSE COMPLAINTS

The anti-sexual harassment policy shall not, however be used to raise malicious complaints. If a complaint has been made in bad faith, as proved by clear and convincing evidence, disciplinary action shall be taken against the complainant. However, inability to submit proof or witness does not amount to false complaint.

NO RETALIATION

This policy is intended to encourage and enable employees to raise bona fide concerns. No employee who reports any complaint shall suffer any harassment, retaliation or adverse employment condition. Action will be taken against violators.

REPORTS

ICC shall maintain records of the complaints received, as per prescribed format by 30th of January every year, ICC shall submit this report to management and to respective District Commissioners/SDM/DM'S office.

POLICY IMPLEMENTATION AND REVIEW

The Policy will be implemented and reviewed regularly by the management. The management reserves the right to amend or modify the policy at any time.

DEFINITION OF MANAGEMENT

In the case of Lenskart for implementation of POSH, management can be either/or the head of the department, organization, undertaking, branch or unit. It will also include a person or board or committee responsible for formations and administration of various policies.

CONFIDENTIALITY

THE COMPLAINT, STATEMENTS AND OTHER EVIDENCES OBTAINED IN THE COURSE OF INQUIRY PROCESS WILL BE CONSIDERED AS CONFIDENTIAL MATERIALS.

Internal Complaints Committee (ICC) Members List

Area	Name	Position	Mobile Number	eMail id	Gender
Delhi NCR Corporate Office	Amrita Prakash	Chairperson	9953068076	amritap@valyoo.in	Female
	Sahana Manjesh	External Consultant	9910286564	sahanamanjesh@gmail.com	Female
	Riya Gupta	Member	9971179012	riya.gupta@lenskart.com	Female
	Sunil Dubey	Member	9810177183	sunil.dubey@lenskart.com	Male
	Arpit Mehrotra	Member	9910013235	arpit.mehrotra@lenskart.com	Male
	Preeti Gupta	Member	9873993213	preetig@valyoo.in	Female
South Zone	Amrita Prakash	Chairperson	9953068076	amritap@valyoo.in	Female
	Sahana Manjesh	External Consultant	9910286564	sahanamanjesh@gmail.com	Female
	Arpit Mehrotra	Member	9910013235	arpit.mehrotra@lenskart.com	Male
	Sunil Menon	Member	9871199573	sunilmenon@lenskart.in	Male
	Riya Gupta	Member	9971179012	riya.gupta@lenskart.com	Female
	Vishal Surana	Member	9957049400	vishal.surana@lenskart.com	Male
Warehouse GGN + Bhiwadi + Hyd	Amrita Prakash	Chairperson	9953068076	amritap@valyoo.in	Female
	Sahana Manjesh	External Consultant	9910286564	sahanamanjesh@gmail.com	Female
	Preeti Gupta	Member	9873993213	preetig@valyoo.in	Male
	Anant Gupta	Member	99100 07776	anant.gupta@lenskart.com	Male
	Kritika Dubey	Member	7982699368	kritika.dubey@lenskart.com	Female
	Vishal Surana	Member	9957049400	vishal.surana@lenskart.com	Female
Rest of India	Amrita Prakash	Chairperson	9953068076	amritap@valyoo.in	Female
	Sahana Manjesh	External Consultant	9910286564	sahanamanjesh@gmail.com	Female
	Preeti Gupta	Member	9873993213	preetig@valyoo.in	Female
	Anant Gupta	Member	99100 07776	anant.gupta@lenskart.com	Male

Area	Name	Position	Mobile Number	eMail id	Gender
	Kritika Dubey	Member	7982699368	kritika.dubey@lenskart.com	Female
	Arpit Mehrotra	Member	9910013235	arpit.mehrotra@lenskart.com	Male
Academy	Amrita Prakash	Chairperson	9953068076	amritap@valyoo.in	Female
	Sahana Manjesh	External Consultant	9910286564	sahanamanjesh@gmail.com	Female
	Varun Mathur	Member	85859 80000	varun.mathur@lenskart.com	Male
	Anant Gupta	Member	99100 07776	anant.gupta@lenskart.com	Male
	Preeti Gupta	Member	9873993213	preetig@valyoo.in	Female

Dealskart - Internal Complaints Committee (ICC) Members List

Area	Name	Position	Mobile Number	eMail id	Gender
North	Priya Daftari	Chairperson	8375983421	priya.daftari@dealskart.in	Female
	Sahana Manjesh	External Consultant	9910286564	sahanamanjesh@gmail.com	Female
	Vishal Giripunje	Member	9130081183	vishal.giripunje@dealskart.in	Male
	Charu Bala	Member	8376950745	charu.bala@dealskart.in	Female
	Udit Bagga	Member	8826641114	udit.bagga@dealskart.in	Male
South	Priya Daftari	Chairperson	8375983421	priya.daftari@dealskart.in	Female
	Sahana Manjesh	External Consultant	9910286564	sahanamanjesh@gmail.com	Female
	Harsha Bhagia	Member	8722039245	harsha.bhagia@dealskart.in	Female
	Udit Bagga	Member	8826641114	udit.bagga@dealskart.in	Male
	K Vijaya Chandran	Member	6238798283	Vijaya.chandran@dealskart.in	Male
East	Priya Daftari	Chairperson	8375983421	priya.daftari@dealskart.in	Female
	Sahana Manjesh	External Consultant	9910286564	sahanamanjesh@gmail.com	Female
	Udit Bagga	Member	8826641114	udit.bagga@dealskart.in	Male
	Ajoy Khutia	Member	6290755185	ajoy.khutia@dealskart.in	Male
	Krishna Saha	Member	8961121999	krishna.saha@dealskart.in	Female
	Projukta Roy	Member	9836662082	projukta.roy@fos.lenskart.in	Female
West	Priya Daftari	Chairperson	8375983421	priya.daftari@dealskart.in	Female
	Sahana Manjesh	External Consultant	9910286564	sahanamanjesh@gmail.com	Female
	Amrit Kaur Harvinder Pal Singh Sandhu	Member	9561054095	amritkaur.sandhu@fos.lenskart.in	Female
	Udit Bagga	Member	8826641114	udit.bagga@dealskart.in	Male
	Harsha Bhagia	Member	8722039245	harsha.bhagia@dealskart.in	Female
	Vishal Giripunje	Member	9130081183	vishal.giripunje@dealskart.in	Male

Annexure-2 : Complaint Form For Registering A Complaint of Sexual Harassment

lenskart

I. DETAILS OF THE COMPLAINANT / AGGRIEVED PERSON

1. **Full Name:** _____
2. **Employee ID:** _____
3. **Designation / Department:** _____
4. **Entity / Company Name:** _____
5. **Workplace Location / Branch:** _____
6. **Mobile Number:** _____
7. **Official Email ID:** _____
8. **Employment Status:** *(Permanent / Contractual / Trainee / Probationer / Vendor / Other)*

II. DETAILS OF THE RESPONDENT (PERSON AGAINST WHOM COMPLAINT IS LODGED)

1. **Full Name:** _____
2. **Employee ID (if known):** _____
3. **Designation / Department:** _____
4. **Workplace Location:** _____
5. **Relationship with Complainant:** *(Supervisor / Peer / Subordinate / Third Party / Other)*

III. DETAILS OF THE INCIDENT(S)

1. **Date(s) & Time of Incident(s):** _____
2. **Location / Venue of Incident(s):** *(Office Premises / Virtual Platform / Off-site Event / Transit / Other)*
3. **Detailed Description of the Incident(s):**

   (Please provide a detailed chronological account of the incident/conduct. Attach additional sheets if necessary.)

4. **Category of Alleged Conduct:** *(Check all that apply)*
   - [ ] Unwelcome physical contact or advances
   - [ ] Demand or request for sexual favors
   - [ ] Sexually colored remarks or jokes
   - [ ] Showing pornography or sexually suggestive material
   - [ ] Electronic communications (Emails, SMS, WhatsApp, Virtual Meetings, etc.)
   - [ ] Promise of preferential treatment / Threat of detrimental treatment (Quid Pro Quo)
   - [ ] Creation of a hostile or intimidating work environment
   - [ ] Any other unwelcome physical, verbal, or non-verbal conduct

IV. WITNESS DETAILS (IF ANY)

Please list any individuals who witnessed the incident(s) or have knowledge related to the complaint:

1. **Name:** _____ **Designation/Dept:** _____ **Contact:** _____
2. **Name:** _____ **Designation/Dept:** _____ **Contact:** _____

V. SUPPORTING EVIDENCE / DOCUMENTS

Are there any supporting documents, communications, emails, text messages, audio/video files, or physical evidence?

- [ ] **Yes** *(Please attach 6 physical copies or attach files to email submission)*
- [ ] **No**

VI. INTERIM RELIEF REQUESTED (OPTIONAL)

During the pendency of the inquiry, do you require any interim relief? *(e.g., Transfer of Complainant/Respondent, Leave, Change of Reporting Line)*

VII. DECLARATION & CONFIDENTIALITY ACKNOWLEDGEMENT

I hereby declare that the details provided above are true, complete, and accurate to the best of my knowledge and belief. I understand that the information shared herein will be kept **strictly confidential** by the Internal Committee and management in accordance with statutory guidelines.

Signature of Complainant: _____

Date: ____ / ____ / _____

Place: _____

Submission Instructions:

Submit this signed form along with supporting documents via email to **POSH@lenskart.in** or hand it over directly to any member of the Internal Committee.