

NANAYASURABHI AFFORDABLE HOUSING FINANCE LIMITED

CIN: U65990TN2014PLC098180

ANTI-SEXUAL HARASSMENT POLICY/ POSH POLICY

| Meeting | Status |
|--|---------------|
| Board Meeting on 25 th September 2019 | Approved |
| Board Meeting on 12 th February 2020 | Reviewed |
| Board Meeting on 27 th February 2021 | Reviewed |
| Board Meeting on 29 th January 2022 | Reviewed |
| Board Meeting on 30 th March 2023 | Reviewed |

NHFLs committed to provide a work environment that ensures every woman employee is treated with dignity and respect and afforded equitable treatment. NHFL is also committed to promote a work environment that is conducive to the professional growth of its women employees and encourages equality of opportunity.

NHFL will not tolerate any form of sexual harassment and is committed to take all necessary steps to ensure that its women employees are not subjected to any form of harassment.

**POLICY ON PREVENTION OF SEXUAL HARASSMENT AT WORKPLACE OF
NANAYASURABHI AFFORDABLE HOUSING FINANCE LIMITED [NHFL]**

I. **COMMITMENT:** NHFL is committed to provide a work environment that ensures every woman employee is treated with dignity and respect and afforded equitable treatment. NHFL is also committed to promote a work environment that is conducive to the professional growth of its women employees and encourages equality of opportunity. NHFL will not tolerate any form of sexual harassment and is committed to take all necessary steps to ensure that its women employees are not subjected to any form of harassment.

II. **SCOPE:** This policy applies to all categories of employees of NHFL, including permanent management and workmen, temporaries, trainees and employees on contract at its workplace or at client sites. NHFL will not tolerate sexual harassment, if engaged in by clients or by suppliers or any other business associates. The workplace includes: 1. All offices or other premises where the Company's business is conducted. 2. All company-related activities performed at any other site away from NHFL's premises. 3. Any social, business or other functions where the conduct or comments may have an adverse impact on the workplace or workplace relations.

III. **DEFINITION OF SEXUAL HARASSMENT:** Sexual harassment may be one or a series of incidents involving unsolicited and unwelcome sexual advances, requests for sexual favours, or any other verbal or physical conduct of sexual nature. Sexual Harassment at the workplace includes: 1. unwelcome sexual advances (verbal, written or physical), 2. demand or request for sexual favours, 3. any other type of sexually-oriented conduct, 4. verbal abuse or 'joking' that

is sex-oriented, 5. any conduct that has the purpose or the effect of interfering with an individual's work performance or creating an intimidating, hostile or offensive work environment and/or submission to such conduct is either an explicit or implicit term or condition of employment and /or submission or rejection of the conduct is used as a basis for making employment decisions.

IV. RESPONSIBILITIES REGARDING SEXUAL HARASSMENT: All employees of NHFL have a personal responsibility to ensure that their behaviour is not contrary to this policy. All employees are encouraged to reinforce the maintenance of a work environment free from sexual harassment.

V. COMPLAINT MECHANISM: Whether or not such conduct constitutes an offence under law or a breach of the service rules, an appropriate complaint mechanism in the form of "Internal Complaints Committee" has been created in the Company for time-bound redressal of the complaint made by the victim.

VI. COMPLAINTS COMMITTEE: NHFL has instituted an Internal Complaints Committee for redressal of sexual harassment complaint (made by the victim) and for ensuring time bound treatment of such complaints. Initially, and till further notice, the Internal Complaints Committee will comprise of such members as may be decided by the Board and / or as laid down in this policy from time to time in accordance with the applicable laws, guidelines, regulations, etc. The Complaints Committee is responsible for: a. Investigating every formal written complaint of sexual harassment b. Taking appropriate remedial measures to respond to any substantiated allegations of sexual harassment c. Discouraging and preventing employment-related sexual harassment The Internal Complaints Committee constituted to consider and redress Complaints of Sexual Harassment would be with effect from initial approval of the policy by the Board. Note that each member of the bellow mentioned committee shall hold his / her position in the Committee for a maximum period of 3 years from the date of their appointment. In case of removal or voluntary separation of a member from the Committee or on completion of the tenure (3 years) or in case of separation of any member from the organisation, the HR shall facilitate for suitable replacement of such member in the Committee under intimation to the Management and the Board. A member shall be removed from the Committee in case he / she is found to have contravened the provisions of the Policy, or • is found to have indulged in rampant abuse of their position or • if he / she is convicted of any offence or an inquiry into an offence is pending against him / her under any Law, or • if he / she is found guilty in any disciplinary proceedings or a disciplinary proceeding is pending against him / her. The committee shall have a permanent email id, for employees to register their grievances, complaints or concerns online via email. The employee may email the complaint to the Internal Complaints Committee on icc@nhflindia.com The quorum for the purpose of meeting/hearing shall be 2/3rd of the members of the Committee. However, this shall not be a pre-requisite for the quorum of an adjourned meeting. In case any member of the Committee is a Complainant / Respondent / Witness, he/ she shall abstain from participating in the proceedings and shall not be a part of the required quorum. In such an event, the Company shall nominate another suitable person in place of such member. Changes in the

constitution of the Committee, whenever necessary, shall be made as expeditiously as possible and in any case within 30 days of the date of vacancy of office by one of the members.

VII. REVIEW PERIODICITY: NHFL shall have the right to amend the Policy from time to time. The policy shall be reviewed every year. However, it shall be reviewed earlier by the committee if need arises for the same and / or under special circumstances, for example a change in law.

VIII. PROCEDURES FOR RESOLUTION, SETTLEMENT OR PROSECUTION OF ACTS OF SEXUAL HARASSMENT: NHFL is committed to providing a supportive environment to resolve concerns of sexual harassment as under:

A. Informal Resolution Options When an incident of sexual harassment occurs, the victim of such conduct can communicate her disapproval and objections immediately to the harasser and request the harasser to behave decently. If the harassment does not stop or if victim is not comfortable with addressing the harasser directly, she can bring her concern to the attention of the Complaints Committee for redressal of her grievances. The Complaints Committee will thereafter provide advice or extend support as requested and will undertake prompt investigation to resolve the matter.

B. Complaints:

1. Any employee with a harassment concern, who is not comfortable with the informal resolution options or has exhausted such options, may make a formal complaint to the Presiding Officer of the Complaints Committee constituted by the Management/Board . The complaint shall have to be in writing and can be in form of a letter, preferably within 15 days from the date of occurrence of the alleged incident, sent in a sealed envelope. Alternately, the employee can send complaint through an email. The employee is required to disclose her name, department, division and location she is working in, to enable the Presiding Officer to contact her and take the matter forward.
2. The Presiding Officer of the Complaints Committee will proceed to determine whether the allegations (assuming them to be true only for the purpose of this determination) made in the complaint fall under the purview of Sexual Harassment, preferably within 30 days from receipt of the complaint. In the event, the allegation does not fall under the purview of Sexual Harassment or the allegation does not constitute an offence of Sexual Harassment, s/he will record this finding with reasons and communicate the same to the complainant.
3. If the Presiding Officer of the Complaints Committee determines that the allegations constitute an act of sexual harassment, s/he will proceed to investigate the allegation with the assistance of the Complaints Committee.
4. Where such conduct on the part of the accused amounts to a specific offence under the law, the Company shall initiate appropriate action in accordance with law by making a complaint with the appropriate authority.
5. The Complaints Committee shall conduct such investigations in a timely manner and shall submit a written report containing the findings and recommendations to the M.D & C.E.O as soon as practically possible and in any case, not later than 90 days from the date of receipt of the complaint. The M.D & C.E.O will ensure corrective action on the recommendations of the Complaints Committee and keep the complainant informed of the same. Corrective action may include any of the following: a. Formal apology b. Counselling c. Written warning to the perpetrator and a copy of it maintained in the employee's file. d. Change of work assignment / transfer for either the perpetrator or the victim. e. Suspension or termination of services of the employee found guilty of the offence
6. In case the complaint is

found to be false, the Complainant shall, if deemed fit, be liable for appropriate disciplinary action by the Management.

IX. CONFIDENTIALITY: NHFL understands that it is difficult for the victim to come forward with a complaint of sexual harassment and recognizes the victim's interest in keeping the matter confidential. To protect the interests of the victim, the accused person and others who may report incidents of sexual harassment, confidentiality will be maintained throughout the investigatory process to the extent practicable and appropriate under the circumstances.

X.ACCESS TO REPORTS AND DOCUMENTS: All records of complaints, including contents of meetings, results of investigations and other relevant material will be kept confidential by the Company except where disclosure is required under disciplinary or other remedial processes

XI. PROTECTION TO COMPLAINANT / VICTIM: NHFL is committed to ensuring that no employee who brings forward a harassment concern is subject to any form of reprisal. Any reprisal will be subject to disciplinary action. The Company will ensure that the victim or witnesses are not victimized or discriminated against while dealing with complaints of sexual harassment. However, anyone who abuses the procedure (for example, by maliciously putting an allegation knowing it to be untrue) will be subject to disciplinary action.

XII. CONCLUSION: In conclusion, NHFL reiterates its commitment to providing its women employees, a workplace free from harassment/ discrimination and where every employee is treated with dignity and respect
