POLICY ON PREVENTION OF SEXUAL HARASSMENT

The Policy on Prevention of Sexual Harassment of Authum Investment & Infrastructure Limited, Holding Company, applies to its subsidiary Companies. Since ISARC is the subsidiary of Authum, the same policy is applicable to ISARC and is enclosed herewith.

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Background & Reference:

This policy is complaint with THE SEXUAL HARASSMENT OF WOMEN AT WORKPLACE (PREVENTION, PROHIBITION AND REDRESSAL) ACT, 2013

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1. Introduction

Authum Investment & Infrastructure Limited is committed to creating a safe and conducive work environment that enables employees to work without fear of prejudice, gender bias and sexual harassment.

Authum Investment & Infrastructure Limited believes that all employees, including other persons who have been dealing with the company, have the right to be treated with respect and dignity. Sexual harassment in any form is an offence and is therefore punishable.

All employees are expected to uphold the highest standards of ethical conduct at the workplace and in all their interactions with business stakeholders. It is mandatory for all employees to follow this Policy and the guidelines formulated herein. Sexual harassment at the workplace will be deemed to be a violation/breach of the terms of employment. This means that employees have a responsibility to:

- Treat each other with dignity and respect
- Follow the letter and spirit of law
- Refrain from any unwelcome behavior that has sexual connotation (or sexual nature)
- Refrain from creating a hostile atmosphere at the workplace via sexual harassment
- Report sexual harassment experienced and/or witnessed to the Employee Protection Committee formulated under this Policy and abide by the complaint handling procedure prescribed herein.

1.1. Purpose

The policy is drafted with an aim to provide protection and prevention against sexual harassment at workplace and to outline the guidelines of redressal of complaints of sexual harassment and for matters connected therewith.

1.2. Scope

This policy applies to all employees who are on the rolls of the company including those on probation and trainees (whether in the office premises or outside while on assignment). The Policy is not in derogation of any other legal rights of the affected employees

This policy also applies to women covered by definition in ‘Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013’.

Where a woman is sexually harassed by a third party or outsider while on official duty, the company will take all necessary and reasonable steps to assist her and offer support.

This Policy takes complete cognizance of the relevant legislations by the Government of India including The Sexual Harassment at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and its rules notification published on December 9, 2013, the ESG Guidelines of SEBI Guidelines for submission of BR Reports, etc. This Act is to provide protection against sexual harassment of women at the workplace and for the prevention and redressal of complaints of sexual harassment and for the matters connected herewith or incidental thereto.

2. Definitions

1. **Act** means the "Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act 2013".

2. **Aggrieved Individual** means any individual who alleges to have been subjected to any act of sexual harassment by an employee of the company.

3. **Company** or **Employer** means Authum Investment & Infrastructure Limited and/or its subsidiaries and associate companies.

4. **Complainant** means the Aggrieved Individual or any relative or colleague of the Aggrieved Individual. If the Aggrieved Individual is unable to make a complaint on account of his/her physical or mental incapacity or death or otherwise), Complainant would refer to the person who makes a complaint alleging sexual harassment on behalf of the Aggrieved Individual under this Policy.

5. **Employee** means a person employed at a workplace for any work on permanent, temporary, part time, ad hoc or daily wage 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.

6. **Internal Committee (IC**) means the committee constituted by the Company to investigate all complaints of sexual harassment as defined under the Act.

7. **Manager** means any person responsible for the management, supervision and control of the workplace including the HR Manager, Circle/Plant/Region/Division/Site/Zone Office Head and Head of any business, entity or function.

8. **Respondent** means a person against whom the complaint has been made.

9. **Workplace** includes:

    a. Any private sector organization or a private venture, undertaking, enterprise, institution, establishment, society, trust, non-governmental organization unit, or service provider carrying on commercial, professional, industrial, or financial activities including production, supply, sale distribution, or service.

    b. Any place visited by the employee arising out of or during the course of employment including transportation provided by the employer for undertaking such journey.

3. Sexual Harassment

"Sexual Harassment" includes any one or more of the following unwelcome acts or behavior (whether directly or by implication) namely:

- Physical contacts and advances; or
- A demand or request for sexual favors; or
- Making sexually colored remarks; or
- Showing pornography; or
- Any other unwelcome physical, verbal or non-verbal conduct of sexual nature

3.1. Types of Sexual Harassment

The following circumstances, amongst other circumstances mentioned above, may constitute sexual harassment if it occurs or is present in relation to or connected with any act or behavior of sexual harassment:

1. **Quid Pro Quo (something for something) Harassment**: A form of sexual harassment resulting in a situation where an employee is required to choose between submitting to sexual advances set out above and losing a tangible benefit or even the job. This form of harassment leads to conditioning employment benefits on submission to sexual advances. This may include:
    - Direct and/or indirect promise of preferential (special) treatment in employment.
    - Direct and/or indirect threat of detrimental (harmful/damaging) treatment in employment.
    - Direct and/or indirect threat about present or future employment status.
2. **Hostile Work Environment Harassment**: Employment discrimination consisting of unwelcome verbal, non-verbal or physical conduct that has the effect of interfering with an Aggrieved Individual's work performance or of creating an intimidating, hostile, offensive or humiliating environment. This may include:
    - Creation of conditions and situations that interfere with work or creation of an intimidating offensive or hostile work environment.
    - Humiliating treatment likely to affect health and/or safety of the Aggrieved Individual.

4. Duties of the Company

The Company shall under the duties and obligations vested under it by the Act perform the following functions:

- Promote a gender sensitive workplace and removing the underlying factors that contribute towards creating a hostile working environment against women
- Provide a safe working environment
- Communicate the policy on Prevention of Sexual Harassment regularly
- Organize workshops and awareness programs at regular intervals for sensitizing employees on the issues and implications of workplace sexual harassment
- Organizing orientation programs for members of the IC
- Prepare an annual report with details on the number of cases filed and their disposal and submit the same to the relevant statutory authorities.

5. Internal Committee (IC)

5.1 Constitution of IC

- The Company shall constitute a committee known as the Internal Committee (IC) to handle and redress all complaints under sexual harassment.
- The internal committee shall constitute of the following members.
  - Presiding Officer who shall be a woman employed at a senior level at workplace from amongst the employees.
  - One member from amongst Non-Governmental organizations or associations committed to the cause of women or a person familiar with the issues relating to sexual harassment
  - Not less than two members from amongst the employees
  - Provided that at least one-half of the total Members so nominated shall be women.
- The Presiding Officer and other members of the IC shall hold office for a maximum duration of 3 years from the date of their nomination to the committee.

5.2 Powers of the IC

While inquiring into a complaint of sexual harassment, the IC shall have the same powers as vested in a civil court under the Code of Civil Procedure, 1908 when trying a suit in respect of:

- Summoning and enforcing the attendance of any person and examining him on oath;
- Requiring the discovery and production of documents; and
- Any other matter which may be prescribed

6. Complaints Process

If an employee is being subjected to sexual harassment committed by anyone, including visitors or other non-employees, he/she should:

- Tell the offender that his / her behavior is unwelcome and ask him / her to stop immediately. However, at this stage, if the employee wishes to make a complaint, he/she may choose to do so.
- Keep a record of incidents (dates, times, locations, possible witness, what happened, response). It is helpful and necessary to have a record of events; since such a record can strengthen the complainant's case and help remember the details over time.
- Report the abuse to reporting manager / HR or to any member of the Internal Committee, if the sexual harassment continues even after telling the offender to stop the behavior. If the respondent is employee's reporting manager, then the incident should be reported to the HR. All complaints must be accompanied by all details clearly mentioning employee's name, other identity, and contact details. Anonymous complaints will not be entertained.
- Such a complaint should be made in writing and within a period of three months from the date of incident, and in case of a series of incidents, within a period of three months from the date of last incident. While submitting the written complaint, it is necessary to submit 6 copies of the complaint along with supporting evidences and the names and addresses of the witness.
- Complaints received by Reporting Manager should be forwarded to HR immediately. HR should immediately forward the case to the Presiding Officer of the IC for further action.
- Once the complainant makes a complaint, it is necessary to keep the information about the complaint 'Strictly Confidential'.
- If an aggrieved woman / man are unable to make a complaint in writing due to physical incapacity, then with a written consent of the complainant, any other person who has knowledge of / is aware of the incident can file a complaint.
- If an aggrieved woman / man are unable to make a complaint in writing due to any other reason like mentally incapacitated or are no longer alive, any person who has knowledge of the incidents can approach the Presiding Officer who will help understand the options / ways of filing a complaint.
- Complainant can also raise a written complaint to the Email Id: POSH@Authum.Com

7. Handling Complaints

7.1. Redressal Process

Complaints received by the IC in accordance to above mentioned clauses will be addressed as per the process laid down in this policy. Consistent with the company's obligation to conduct an investigation and take appropriate corrective action, any complaint of sexual harassment will be treated immediately and fairly.

- Once a complaint is received, it will be kept strictly confidential and will be dealt with confidentially. The respondent will be informed that a complaint has been filed against him and no unfair acts of retaliation or unethical action will be tolerated.
- The Internal Committee shall send one copy of the complaint received from the aggrieved person to the respondent.
- The respondent has to file his / her reply to the complaint along with the list of documents and names and addresses of witnesses, within a further period of 10 working days from the date he / she receives a copy of the complaint. The reply should be filed with the Internal Committee.
- The Internal Committee may, before initiating an inquiry and at the request of the aggrieved person, take steps to settle the matter between her and the respondent through conciliation, provided no monetary settlement is to be made as a basis of conciliation.
- Where a settlement has been arrived at, the Internal Committee will record the settlement and forward the same to the HR/employer, to take action as specified in the recommendation. Copies of the settlement will be given to the aggrieved woman/man and the respondent. The Internal Committee will conduct no further inquiry in this case.
- If the aggrieved person informs the Internal Committee, that any term of condition of the settlement arrived has not been complied with by the respondent, the Internal Committee shall proceed to make an inquiry into the complaint, which includes forwarding the complaint to the police as the case may be. If the aggrieved man informs the Internal Committee about non-compliance of the settlement by the respondent, the Internal Committee will proceed to making an inquiry into the complaint.
- Both, the complainant and the respondent, initially will be questioned separately with a view to ascertain the veracity of their contentions.
- The Internal Committee shall, where the respondent is an employee, proceed to make inquiry into the complaint in accordance with the provisions of the service rules applicable to the respondent. In addition, the Internal Committee shall, if the aggrieved person so desires and if prima facie case exists, assist and forward the complaint to the police, for registering the case under section 509 of the Indian Penal Code.
- The Internal Committee shall have the right to terminate the inquiry proceedings or to give an ex-parte decision on the complaint, if the complainant or respondent fails without sufficient reason to present in three consecutive hearings convened for the purpose. Such a decision will be taken after giving a notice in writing, 15 days in advance to the party concerned.

- During the pendency of an inquiry, on a written request made by the complainant, the Internal Committee in its sole discretion, may recommend to the employer the following:
    - Transfer the aggrieved woman/man or the respondent to any other workplace or department
    - Restrain the respondent from reporting on work performance of the aggrieved woman/ man or writing his or her confidential report and assign the same to another manager
    - Grant leave to the aggrieved woman up to a period of three months
- The Internal Committee will make such a recommendation after considering the necessity of taking such an action, if a prima facie case of sexual harassment exists, and if the medical condition of the aggrieved woman so requires, as certified by a competent medical authority. It will also depend upon the extent of damage it can cause and the severity of the incidence.
- The Internal Committee, on completing the inquiry, will make a detailed report within 10 days of completing the inquiry, and submit to the employer the following:
    - Background
    - Documented testimony of the complainant and the respondent
    - Evidences gathered / recorded
    - Findings of the inquiry
    - Recommended action
- The Internal Committee, if after completing an inquiry, arrives at the conclusion that the allegation against the respondent has not been proved, it shall recommend to the employer that no action be taken in the matter.
- If the Internal Committee arrives at the conclusion that the allegations against the respondent has been proved, it shall recommend to the employer:
    - To take action for sexual harassment as misconduct in accordance with the provisions of the service rules applicable to the respondent including dismissal. It can recommend to the employer to take any action including a written apology, warning, reprimand, withholding of promotion, withholding of pay rise or increments, terminating the respondent from service or undergoing a counseling session or carrying out community service.
    - To deduct from the respondent's salary or wages, an amount that may be considered appropriate to be paid to the aggrieved woman as prescribed under the law.

  The employer can deduct from the salary of the respondent, but if it is not able to do so due to absence from duty or cessation of employment, it may direct to the respondent to pay such sum to the aggrieved woman. In case the respondent fails to pay the sum,

the Internal Committee can forward the order for recovery of the sum as an arrear of land revenue to the concerned District Officer.

- Upon receipt of the report, the employer will review the report and determine what action and follow-up needs to happen. Such a decision, on the recommendations of the Internal Committee, will be taken within sixty days of receiving the report from the Internal Committee.
- The decision of the management in this regard shall be informed to the complainant and the respondent.
- Notwithstanding anything contained in the Right to Information Act 2005, the contents of the complaint made, identity**,** addresses of the aggrieved woman, respondent, and witnesses, any information relating to conciliation and inquiry proceeding, recommendations of the Internal Committee shall not be published, communicated or made known to the public.
- Enquiry under this policy will be preferably held at the location of the complaint.

7.2. False or Malicious Complaints

This policy has been created as a tool to ensure that in the interest of justice and fair play, employees have a forum to approach in the event of instances of sexual harassment. However, if an inquiry by the Internal Committee it is revealed and concluded that the complaint was made with a malicious intent or the aggrieved woman/man or any other person making the complaint has made the complaint knowing it to be false, forged, or misleading document submission and with the motive of maligning the concerned individual / tarnishing her/his image in the company and to settle personal/professional scores, it will recommend to the employer to take any action against the complainant in accordance with the provisions of the employment contract applicable to her or him, or where no such employment contract exists, in such manner as may be prescribed by the CEO.

Provided that, mere inability to substantiate a complaint or provide adequate proof may not attract action against the complainant.

If in case the Internal Committee arrives at a conclusion that during the inquiry, any witness has given false evidence or produced any forged or misleading document, it may recommend to the employer to take any action against the witness in accordance with the provisions of the employment contract applicable to her or him, or where no such employment contract exists, in such manner as may be prescribed by the CEO.

7.3. Protection against Retaliation

The company prohibits retaliation of any sort, regardless of the outcome of the complaint against a person who has reported a concern, brought a complaint, cooperated in the inquiry of a complaint, or because a person is closely associated with an individual who has raised a complaint. The company, while dealing with complaints of sexual harassment, shall ensure that the complainant or the witness are not victimized or discriminated against by the respondent. The complainant should report any unwarranted pressures, retaliatory or any other type of

unethical behavior from the respondent, while the investigation is in progress to the Internal Committee or to the company, as soon as possible. Management will take disciplinary action against the respondent if the complaint of retaliation made is found to be genuine.

8. Annexure

8.1. Members of the Internal Committee

Name	Role	Email Id
Jyoti Dhuppar	AVP - Strategy	jyoti.dh.dhuppar@authum.com
Priya Shetty	Senior Manager – Treasury	priya.shetty@authum.com
Avni Shah	Senior Manager – Compliance	avni.shah@authum.com
Savneet Chopra	Head – Operations & Customer Service	savneet.chopra@authum.com
Nimesh Chonkar	Head – Talent & Compensation	nimesh.chonkar@authum.com
Ashwini Inamdar	External Member (Mandatory)	csashwini.inamdar@authum.com

* Any 4 out of 5 internal members can complete the quorum

About Ashwini Inamdar:

Ms. Ashwini Inamdar is a Company Secretary and has a master's in law. She is into practice for more than 11 years and is a Senior Partner at Mehta & Mehta, Company Secretaries which is a 26-year-old well known firm in Mumbai. She specializes in Listing of Companies on the Stock Exchanges and also has a vast experience in matters relating to Takeover Regulations and Companies Act. She has a good experience in the areas of Corporate Laws, Secretarial Audits and consultancy. She is a corporate trainer for Insider Trading Regulations. She is also a certified POSH trainer from an Institute empaneled by the Ministry of Women & Child Development. She is also an External Committee Member of the POSH Committee of Royal Bombay Yacht Club and Navkar Corporation Limited. She conducts sessions regularly to educate & empower employees /staff about their rights as well as duties under the Law against Sexual Harassment.

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