

**ANTI SEXUAL HARASSMENT POLICY
POLICY ON PREVENTION OF SEXUAL HARASSMENT AT WORKPLACE
OF NIVARA HOME FINANCE LIMITED**

I. COMMITMENT:

Nivara is committed to provide a work environment that ensures every woman employee is treated with dignity and respect and afforded equitable treatment.

Every aggrieved woman “complainant” working with Nivara can file a complaint against her co-worker, manager or senior management for sexual harassment.

In case the complaint is found to be false disciplinary action will be taken against the complainant.

II. SCOPE:

This policy applies to all categories of employees of Nivara, permanent management and workmen, temporaries, trainees employees on contract at its workplace or at client sites. Nivara will not tolerate sexual harassment, if engaged in by clients or by any business associates.

The workplace includes:

- a. All offices or other premises where the Company's business is conducted.
- b. All company-related activities performed at any other site away from Nivara's premises.
- c. 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” includes any one or more of the following unwelcome acts or behavior (whether directly or by implication):

- i. Making sexually suggestive remarks
- ii. Serious or repeated offensive remarks, such as teasing related to a person's body or appearance.
- iii. Offensive comments or jokes.
- iv. Inappropriate questions, suggestions or remarks about a person's sex life.
- v. Displaying sexist or other offensive pictures, posters, mms, sms, whatsapp, or e-mails.
- vi. Giving gifts or leaving objects that are sexually suggestive;
- vii. Intimidation, threats, blackmail around sexual favours.
- viii. Threats, intimidation or retaliation against an employee who speaks up about unwelcome behaviour with sexual overtones.
- ix. Unwelcome social invitations, with sexual overtones commonly understood as flirting.
- x. Unwelcome sexual advances which may or may not be accompanied by promises or threats, explicit or implicit.
- xi. Physical contact such as touching or pinching.
- xii. Caressing, kissing someone against her will (could be considered assault).
- xiii. Invasion of personal space (getting too close for no reason, brushing against or cornering someone).

- xiv. Persistently asking someone out, despite being turned down.
- xv. Stalking an individual.
- xvi. Abuse of authority or power to threaten a person's job or undermine her performance against sexual favours.
- xvii. Falsey accusing and undermining a person behind closed doors for sexual favours.
- xviii. Controlling a person's reputation by rumour-mongering about her private life.

IV. LODGING A COMPLAINT:

- a. The complainant needs to submit a detailed complaint, along with any documentary evidence available or names of witnesses, to the Presiding Officer via email at raina.d@nivarahousing.com or in the form of letter sent in sealed envelope at the registered office of the Company "The Presiding Officer, Internal Complaints Committee, Nivara Home Finance Limited, 3rd Floor, BNR Complex, JP Nagar, 7th Phase, Bangalore 560078"
- b. The complaint must be lodged within 3 months from the date of incident/ last incident. The Committee can extend the timeline by another 3 months for reasons recorded in writing, if satisfied that these reasons prevented the lodging of the complaint.

V. COMPLAINTS COMMITTEE:

Nivara 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 Committee Members are:

- a) Mr. Shreyas Ramanathan (Head Risk, Credit & IT)
- b) Mr. Sumit Saurabh (Head Business Development)
- c) Mr. Bonojit Ukil (Head Internal Audit and Compliance)
- d) Mrs. Raina D'Silva (Company Secretary)

VI. PROCEDURES FOR RESOLUTION, SETTLEMENT OR PROSECUTION OF ACTS OF SEXUAL HARASSMENT:

Nivara 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 can communicate her disapproval and objections immediately to the harasser a 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 Complaint Committee will thereafter

provide advice or extend support as requested and will undertake prompt investigation to resolve the matter.

B. Complaints:

- i. 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.
- ii. 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.
- iii. The Complaints Committee shall conduct such investigations in a timely manner and shall submit a written report containing the findings and recommendations to the MD as soon as practically possible and in any case, not later than 90 days from the date of receipt of the complaint. The MD will ensure corrective action on the recommendations of the Complaints Committee and keep the complainant informed of the same.
- iv. Corrective action may include any of the following:
 - Formal apology
 - Counselling
 - Written warning to the perpetrator and a copy of it maintained in the employee's file.
 - Change of work assignment / transfer for either the perpetrator or the victim.
 - Suspension or termination of services of the employee found guilty of the offence

VII. RESPONSIBILITIES REGARDING SEXUAL HARASSMENT:

All employees of Nivara have a personal responsibility to ensure that their behavior is not contrary to this policy. All employees are encouraged to reinforce the maintenance of a work environment free from sexual harassment.

VIII. RESPONSIBILITIES OF MANAGERS:

All managers at Nivara must ensure that nobody is subject to harassment and there is equal treatment. They must also ensure that all employees understand that harassment will not be tolerated; that complaints will be taken seriously; and that the complainant, respondent/s, or witnesses are not victimized in any way.

IX. CONFIDENTIALITY:

The identity of the complainant, respondent, witnesses, statements and other evidence obtained in the course of inquiry process, recommendations of the committees, action taken by the employer is considered as confidential materials, and not published or made known to public or media. Any person contravening the confidentiality clauses is subject to disciplinary action as prescribed in the act.

All notes are kept strictly confidential. Complainant's agreement is taken to allow proceeding with the matter, which involves a formal investigation.

The complainant is advised that although the process is confidential, the respondent needs to be informed and any witnesses and persons directly involved in the complaint process will also learn of the complainant's identity.

X. PROTECTION TO COMPLAINANT / VICTIM:

Nivara is committed to ensuring that no employee who brings forward harassment concern is subject to any form of retaliation. Any retaliation 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.

XI. INTERIM RELIEF:

During pendency of the inquiry, on a written request made by the complainant, the committee may recommend to the employer to -

- Transfer the complainant or the respondent to any other workplace.
- Prevent the respondent from assessing complainant's work performance.
- Grant such other relief as may be appropriate.