



ANTI SEXUAL HARASSMENT POLICY

| Version | Authority | Date of Approval |
|---------|-----------|------------------------------------------|
| V.1 | Board | 17.07.2018 |
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| V.4 | Board | 21.02.2024 |
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| V.6 | Board | 09.09.2024 |
| V.7 | Board | 13.03.2025 |

I. COMMITMENT:

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

Every aggrieved “complainant” working with Nivara can file a complaint against the respondent 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 (including transportation provided by the Company for undertaking such journey).
- b. All company-related activities performed at any other site away from Nivara’s premises, including work-related communications, including any communication facilitated by information and communication technologies.
- 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. Falsely 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 POSH@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, No. 22,23,24,25/101/3, 3rd Floor, BNR Complex, Sri Rama Layout, Opp. RBI Layout, JP Nagar, 7th Phase, Bangalore 560078”
- b. The complaint must be lodged **within 3 months** from the date of incident and in case of series of incidents within 3 months from the date of 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.
- c. If complaint can not be made in writing, the Presiding Officer or any Member of the Internal Committee, shall render all reasonable assistance to the complainant for making the complaint in writing.
- d. If the aggrieved person is not able to make a complaint on account of physical incapacity, following person may file complaint on their behalf:
 - Relative or Friend
 - Co-worker
 - an officer of the National Commission for Women or State Women’s Commission; or
 - any person who has knowledge of the incident, with the written consent of the aggrieved person.
- e. If the aggrieved person is not able to make a complaint on account of mental incapacity, following person may file complaint on their behalf:
 - Relative or Friend; or
 - a special educator; or
 - a qualified psychiatrist or psychologist; or
 - the guardian or authority under whose care they are receiving treatment or care; or
 - any person who has knowledge of the incident jointly with her relative or friend or a special educator or qualified psychiatrist or psychologist, or guardian or authority under whose care they are receiving treatment or care.
- f. If the aggrieved person for any other reason is unable to make a complaint, a complaint may be filed by any person who has knowledge of the incident, with their written consent.
- g. If the aggrieved person is dead, a complaint may be filed by any person who has knowledge of the incident, with the written consent of legal heir.
- h. On receipt of Complaint, the Committee shall initiate proper investigation and adhere to redress the complaint **within 1 month** of lodging the complaint.

Any complaints of sexual harassment raised by employees would be dealt with in accordance with the above procedures.

Further, the Company is committed to giving every employee a just and fair hearing on issues encountered by them at the workplace with special attention to Sexual Harassment. Consistent with this commitment, the complaints of Sexual Harassment by all complainants excluding female complainants will be dealt as per HR disciplinary policy.

V. INTERNAL COMPLAINTS COMMITTEE (“ICC”):

The Company with the approval of its Managing Director has constituted an Internal Complaints Committee at Corporate Office and branch offices for redressal of sexual harassment complaint (made by the victim) and for ensuring time bound treatment of such complaints.

Managing Director of the Company is authorized to:

- (a) make changes to the constitution of the committee as and when required and
- (b) take any other steps in connection with proper functioning of the Committee.

The Committee shall comprise of atleast Four (4) members out of which atleast half of the total members shall be women:

- Presiding Officer: A Woman employed at the senior level in the Company*
- Atleast two (2) members from amongst employees, committed to cause of women and/or having legal knowledge
- One (1) external member familiar with the issue of Sexual Harassment

*In case there is no senior level woman employee, the Presiding Officer shall be nominated from any other department.

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 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 Internal Complaints Committee for redressal of her grievances. The Internal Complaint Committee will thereafter provide advice or extend support as requested and will undertake prompt investigation to resolve the matter.

B. Conciliation

The ICC may, before initiating an inquiry at the request of the aggrieved employee take steps to settle the matter between employee and the respondent through conciliation. However, ICC ensures that no monetary settlement shall be made as a basis of Conciliation.

In case settlement is arrived, the ICC records and reports the settlement to employer to take further action as specified in the recommendations.

No further enquiry shall be conducted by the ICC where a settlement is arrived.

C. Complaints:

- i. If the Presiding Officer of the Complaints Committee determines that the allegations constitute an act of sexual harassment, she will proceed to investigate the allegation with the assistance of the Internal 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. On receipt of the complaint, the ICC shall send one of the copies received from the aggrieved person to the respondent within a period of **7 working days**.
- iv. The respondent shall file his reply to the complaint along with his list of documents, and names and addresses of witnesses, within a period not exceeding **10 working days** from the date of receipt of the documents.
- v. The ICC shall make inquiry into the complaint in accordance with the principles of natural justice. The ICC 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 cause, to present herself or himself for three consecutive hearings convened by the Chairperson or Presiding Officer, as the case may be. *Provided that such termination or ex-parte order may not be passed without giving a fifteen days advance notice in writing to the party concerned.*
- vi. The parties shall not be allowed to bring in any legal practitioner to represent them in their case at any stage of the proceedings before the ICC. In conducting the inquiry, a minimum of three Members of the ICC including the Presiding Officer or the Chairperson, as the case may be, shall be present.

VII. ACTIONS DURING PENDENCY OF INQUIRY

At the written request of aggrieved person, The ICC may recommend to the employer

- To restrain the respondent from reporting on the work performance of the aggrieved person or writing confidential report
- Assign the aggrieved person to another officer

VIII. 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.

IX. 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.

X. MANNER OF TAKING ACTION FOR SEXUAL HARASSMENT

Upon completion of the inquiry, the Complaints Committee shall provide a report of its findings to the Company and the concerned parties within 10 days of the completion of the inquiry. If the allegation has not been proved, no corrective action shall be taken in the matter. The complainant may withdraw her / his / their complaint in writing at any time during the complaint's receiving

and / or inquiry procedure. If the Complaints Committee arrives at the conclusion that the allegation against the respondent has been proved, it shall recommend to the employer to take any following action

- Written apology,
- Counselling,
- Warning,
- Reprimand or censure,
- Withholding of promotion,
- Withholding of pay rise or increments,
- Terminating the respondent from service,
- undergoing a counselling session or carrying out community service.

XI. ACTION FOR FALSE OR MALICIOUS COMPLAINT OR FALSE EVIDENCE:

If the Complaints Committee arrives at the conclusion that the allegation against the respondent is malicious or the aggrieved woman or any other person making the complaint has made the complaint knowing it to be false or the aggrieved woman or any other person making the complaint has produced any forged or misleading document, it may recommend to the employer to take action any of the action stated in point ix.

XII. 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.

XIII. 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.

XIV. PREPARATION OF ANNUAL REPORT:

The annual report which the Complaints Committee shall prepare, shall have the following details:

- (a) number of complaints of sexual harassment received in the year;
- (b) number of complaints disposed off during the year;
- (c) number of cases pending for more than ninety days;
- (d) number of workshops or awareness programme against sexual harassment carried out;
- (e) nature of action taken by the employer.

XV. POLICY IMPLEMENTATION AND REVIEW:

The policy will be implemented and reviewed by the Board on need basis, considering the principle of natural justice and the best practices. The Company reserves the rights to amend, abrogate, modify, rescind, reinstate the entire policy or any part of it at any time.