

Srei Infrastructure Finance Limited

Prevention of Sexual Harassment at Workplace

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Version	Owner	Approved by	Approval Date
1.0	Human Resources - CHRO	Board of Directors	5th June, 2024
2.0			6th August, 2025

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Definitions	<p>A. Sexual Harassment</p> <p>i. For this Policy, Sexual Harassment shall include: Any form of verbal or physical behaviour which is unsolicited and unwelcome and interferes with an individual's work performance by creating an intimidating/insecure working environment.</p> <p>ii. Unwelcome sexually determined behaviour (whether directly or by implication) in any form, such as:</p> <ul style="list-style-type: none"> a. Physical contacts and advances b. A demand or a request for sexual favours c. Sexually coloured remarks d. Showing pornography e. Any other unwelcome physical, verbal/non-verbal conduct of sexual nature <p>iii. Where any of these acts are committed in circumstances where the Complainant has a reasonable apprehension that in relation to the Complainant's employment or work whether drawing salary or honorarium or voluntary, whether in public or private enterprise such conducts can be humiliating and may constitute a health and safety problem. This list is illustrative and not exhaustive and applicable irrespective of gender.</p> <p>B. Complainant</p> <p>A person who has been subject to Sexual Harassment and/ or any Person reporting an incident of Sexual Harassment. A third party can also be a Complainant; however, a written Complaint from the Person who has been subject to Sexual Harassment is mandatory to be filed with the respective RC or IC as the case may be.</p> <p>C. Respondent</p> <p>The person who is alleged/reported to have committed an act of Sexual Harassment.</p> <p>D. Designated Authority</p> <p>An employee who has been assigned authority by the organization's management / Board of Director / the Head of the organization, possessing skills in a specific area to perform a task or take such decision on behalf of the organization.</p> <p>E. Conciliation</p> <p>The process of settling disputes without litigations. The disputes are settled through consensus or similar techniques. Conciliation comprises of 3 parties, the complainant, the accused, and the conciliator. The conciliatory role is to be played by the IC members. The conciliator will play an advisory role and may intervene to offer feasible solutions to both parties and help settle their disputes.</p>
Purpose and Scope	<p>Srei in its endeavour to provide a safe and healthy work environment for all its employees has developed a policy to ensure zero tolerance towards verbal, physical, psychological conduct of a sexual nature by any employee or stakeholder that</p>

	<p>directly or indirectly harasses, disrupts, or interferes with another's work performance or creates an intimidating, offensive or hostile environment such that each employee can realize her maximum potential.</p> <p>This policy is meant to sensitize the employees about their fundamental right to have safe and healthy environment at their workplace and what conduct constitutes sexual harassment, the ways and means which we are adopting to prevent occurrence of any such event, and in the chance of an occurrence, to enable a fair mechanism for dealing with such conduct, SEFL/SIFL has constituted an Internal Complaint Committee ("IC") of Srei Infrastructure Finance Limited and Srei Equipment Finance Limited respectively located at Kolkata as per the guidelines of the Act and also, Regional Complaint Committee(s) ("RC") at East, North, South and West region. Hereinafter, RC and IC shall collectively be referred to as the "Committee".</p> <p>Subsidiary companies which do not have adequate number of employees to constitute IC will be supported SEFL/SIFL's IC / RC.</p>
Procedures/Process Standards/ Guidelines/ Related Documents	<p>A. Preventive Measures</p> <ol style="list-style-type: none"> i. Sensitization programs / workshops / training to be organized jointly by IC and RC members along Human Resources Department on a periodic basis: <ol style="list-style-type: none"> a. To sensitize employees about their right to have a safe and healthy work environment. b. To spread awareness about the same either by way of publication, advertisement or by convening meetings. c. Increase awareness amongst employees on IC / RC ii. Maintain records of all sexual harassment cases and findings by the secretary of IC / RC. iii. Display penal provisions of sexual harassment. <p>B. B. Constitution of IC/RC</p> <p>The Internal Committees shall consist of the following members to be nominated by the employer (Designated authority), namely:</p> <ol style="list-style-type: none"> i. A Presiding Officer who shall be a woman employed at a senior level at workplace from amongst the employees: Provided that in case a senior level woman employee is not available, the Presiding Officer shall be nominated from other offices or administrative units of the workplace referred to in sub-section (1) of the POSH Act. ii. ii. Not less than two Members from amongst employees preferably committed to the cause of women or who have had experience in social work or have legal knowledge. iii. Each Committee is mandatorily required to involve an external member (a senior member of an NGO or another body who is familiar with the issues of sexual

	<p>harassment) during the enquiry of Complaint(s) and formalization of the Report in connection therewith.</p> <p>Provided that at least one-half of the total Members so nominated shall be women.</p> <p>iv. The quorum for the meeting of the Committee would constitute of at least three members present in person or at least fifty percent of the total members of the Committee, whichever is higher. The Presiding Officer will hold the final authority to accept the quorum.</p> <p>v. In case any of the IC members wishes to step down from the committee for any specific / ensuing case or time period, the same needs to intimate and approved in writing from the Designated Authority.</p> <p>vi. The Presiding Officer and every Member of the Internal Committee shall hold office for such a period, not exceeding three years, from the date of their nomination as may be specified by the employer.</p> <p>vii. The External Member appointed shall be paid such fees or allowances for holding the proceedings of the Internal Committee, by the employer, as may be prescribed.</p> <p>viii. Where the Presiding Officer or any Member of the Internal Committee,</p> <ol style="list-style-type: none"> contravenes the provisions of section 16; or has been convicted for an offence or an inquiry into an offence under any law for the time being in force is pending against him / her; or He /She has been found guilty in any disciplinary proceedings or a disciplinary proceeding is pending against him/her; or Has so abused his/her position as to render his/her continuance in office prejudicial to the public interest, such Presiding Officer or Member as the case may be, shall be removed from the Committee and the vacancy so created or any casual vacancy shall be filled by fresh nomination. <p>ix. The Designated Authority and CHRO will review the constitution of the members of IC as well as the respective RCs as and when required and make new appointments if so, required on the exit of any member(s) on case-to-case basis. As and when the composition of the any of the Committee is revised, same will be updated in the policy which is in the domain of all employees through Srei intranet.</p> <p>x. The names and contact details of each IC and RC members are in Schedule A. Any subsequent change in Schedule A to this Policy, if approved by the Board, shall be deemed to be part & parcel of this Policy and to be intimated.</p> <p>xi. It is mandatory for the IC and RC to meet (within their committee) at regular intervals even if no complains have been received. The frequency has to be minimum once a quarter.</p> <p>C. Reporting of Sexual Harassment Complaints</p>
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Any aggrieved person who feels/presumes that he/she has been subject to sexual harassment by a person, including a supervisor, manager, employee of the organization or vendor or client or visitor by way of any action or words should immediately report or complain the incident to the respective RC or IC as set forth below as the case may be or to any member of respective RC / IC within three months from the date of occurrence of the said incident and in case of a series of incidents within a period of three months from the date of the last incident. Delay in reporting makes it more difficult to establish the facts of a case and may contribute to the repetition of offensive behaviour.

If a Complaint cannot be made in writing any member of the respective RC or the IC as the case may shall render all reasonable assistance to the aggrieved person for making the Complaint in writing.

If the Committee is satisfied that the circumstances were such that prevented the Complainant from filing the complaint within the said period, they can extend the time limit not exceeding 3 (three) months.

D. Complaint Reporting Channel

- i. A Complaint should be made to the respective RC or IC of SIFL or SEFL as the case may be. In the event any matter is received by the respective RC, the RC shall report the matter / Complaint immediately to the respective IC and redress such Complaint as per the present Policy as guided by the IC. Further, the finding of the RC shall be reported to the Head of the Organization through respective ICs.
- ii. The Complaint may be raised to either of these email ids (depending upon your tagging) – posh.sifl@srei.com or posh.sefl@srei.com
- iii. A Complaint can also, be made directly to the respective ICs.

E. Complaint Mechanism

- i. A Person who has been subject to Sexual Harassment may make in writing a Complaint of sexual harassment at workplace to the Committee within a period of three months from the date of incidence and in case of series of incidences within a period of three months from the date of the last incidence. Provided that where such Complaint cannot be made in writing, the presiding Chairperson or any member of the respective RC / IC or the chairperson shall render all reasonable assistance to the Complainant for making the Complaint in writing.
- ii. If the Committee is satisfied that the circumstances were such that prevented the Complainant from filling the Complaint within the said period, they can extend the time limit not exceeding three months.
- iii. The Complainant is required to send the written Complaint to the respective RC / IC by way of six copies of the letter detailing Complaint. The Complainant may also email the Complaint to a Committee member. The Complaint may be made in the format provided in Schedule B, herein or in such a manner containing all

	<p>the information as provided in Schedule B.</p> <ul style="list-style-type: none"> iv. It is pertinent to mention that the written Complaint is mandatorily required to be filed by the Complainant with full name and details for seeking any action under this Policy and / or the Act. Any anonymous Complaint shall not be entertained. v. Where the Complainant is unable to file the Complaint of their own, on account of their Physical or Mental incapacity or Death or otherwise, their legal heirs or parents, spouse, children, or sibling can file the Complaint. vi. A third party can also be a Complainant; however, a written Complaint from the Person who has been subject to Sexual Harassment is mandatory to be filed with the respective RC or IC as the case may be. vii. Both written/emailed Complaints must provide the details of the incident together with the name/s of the Respondent/s and the Complainant/s as available. <p>F. Confidentiality</p> <p>The company will do everything consistent with enforcement of this policy and with the law to protect the privacy of the individuals involved and to ensure that the Complainant and the Respondent are treated fairly. Information about individual Complaints and their disposition is considered confidential and will be shared only on a “need to know” basis. However, the IC and / or RC members and/ or Employer shall not be held responsible under present confidentiality clause in the event the Complaint is filed by a third party and / or material facts with regard to Complaint are already known to other persons/individuals.</p> <p>Further, once the Complaint is redressed by the respective RC and/or respective IC, as the case may be the Employee should share the information with all employees with regard to the filing, redressal and disposal of the Complaint in a fair and timely manner without disclosing the name of the Complainant and Respondent.</p> <p>G. Assurance against Retaliation</p> <p>This policy seeks to encourage all employees to express freely, responsibly, and in orderly way opinions and feelings about any problem or complaint of sexual harassment. Retaliation against persons who report or provide information about sexual harassment or behaviour that might constitute sexual harassment is also strictly prohibited. Any act of reprisal, including internal interference, coercion, and restraint, by an employee, violates this policy and will result in appropriate disciplinary actions.</p> <p>Such disciplinary action will be proposed by the Committee as per the provisions of the Act and as per this Policy/guideline and on the recommendation of the respective Committee the Head of Organization, as the case may would ensure implementation of same.</p>
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H. Conciliation

It is important to mention herein that, before initiation of enquiry, the respective RC/ IC on receipt of any Complaint from the Complainant should upfront seek her expectation from the RC/ IC with regard to Complaint and the respective RC / IC should also brief the Complainant about the option of conciliation available to her with the Respondent if so desired by the Complainant. However, once the enquiry has initiated the option of conciliation ceases to exist.

The IC/RC at the request of the aggrieved party should take steps to settle the matter between the two parties involved through conciliation provided that no monetary settlement shall be made based on conciliation. Where a settlement has been arrived, no further inquiry shall be conducted by the IC/RC.

I. Enquiry Procedure

- i. A timely enquiry of Complaints of sexual harassment is of utmost importance. Normally, the enquiry shall be concluded and acted upon at the earliest from the date of the Complaint being made in writing.
- ii. The respective RC / IC, as the case may be will conduct an enquiry and provide an opportunity to the Complainant as well as the Respondent to represent their case and explanations/reasoning thereto.
- iii. All complaints (PAN India) will be received by the IC Presiding Officer and Secretary and will be forwarded to concerned committee as may be the case.
- iv. The Inquiry shall be completed within a period of 90 days from the date of receiving the complaint against acknowledgement.
- v. On the completion of an inquiry under POSH ACT, the Internal Committee shall provide a report within a period of ten days from the date of completion of the inquiry and such a report be made available to the concerned parties.
- vi. In the event any Complaint is received, the following procedure shall be followed by the respective RC / IC:
 - a. An enquiry is initiated through the members of the respective RC or IC, as the case may be as advised by the Presiding Officer at the earliest after receiving the Complaint in writing/email.
 - b. The enquiry seeking detailed information/explanation/ reasoning will be conducted with the Complainant as well as Respondent independently by the respective RC / IC.
 - c. The enquiry proceedings convened by respective RC/ IC should always be minuted and/or video recorded and same to be saved and maintained for records by the respective IC / RC as the case may be. The proceedings of the enquiry (while the witness makes his/ her submission) should be recorded on camera.
 - d. On submission of report the respective RC / IC shall consider the report at the earliest and, on being satisfied for the need, may order a full enquiry

	<p>into the Complaint.</p> <ol style="list-style-type: none"> e. The respective RC / IC will study the findings and shall then proceed to deal with the Complaint in accordance with the Policy and the Act and redress the Complaint within ninety (90) days from the date of receipt of the Complaint and accordingly submit its detailed finding and advise in connection with the Complaint to the respective Employer, as the case may be. f. A copy of the findings shall be made available to both the parties so that they may represent against the findings before the IC/RC. g. However, the respective RC / IC may close the enquiry and/or is not required to initiate same in the event the Complainant fails to appear before the respective RC / IC and/or fails to revert to the query(s) raised by the respective RC / IC for three consecutive events. The respective RC/ IC shall record the reasons for the closure of the Complaint accordingly. Further, in the event, the respondent deliberately avoids her appearance before the respective RC / IC, the employer or any person so appointed by the employer should direct/instruct the Respondent to appear before the respective RC / IC. h. Thereafter, the respective RC / IC will present the decision including the handover of all the collected material i.e., the duly signed statement of the Complainant, Respondent, witnesses, involved parties and material objects if any along with a recommendation to the Secretary of IC. The implementation authority of the consequences as suggested by IC / RC will be the Office of the Head of the Organization. i. In the event that there are no eyewitnesses, the respective RC / IC may have to resolve a sexual harassment claim based on the credibility of the parties. Circumstantial evidence also would play an important role during the decision-making process by the Committee. j. The employer may seek clarification from the respective RC / IC on the recommendation and will implement the same. k. The final decision shall be communicated to the Complainant and the Respondent. l. An enquiry in connection with any Complaint may be initiated/continued irrespective of the fact that police proceeding has also been initiated in connection with the said Complaint. m. On the completion of an enquiry under POSH Act, the IC shall provide a report within a period of 10 (ten) days from the date of completion of the enquiry and such report be made available to the concerned parties. n. Upon receiving a RC Complain, the concerned RC needs to update the final report to IC o. The final outcome along with recommendations to be shared by the IC presiding officer with the head of the Company. In case, it's a RC case, the Presiding Officer of RC may accompany. <p>J. Appeal</p> <p>Any aggrieved person on non-implementation of recommendations may prefer to appeal to the court or tribunal with provisions of the service rules applicable to the said person. The appeal is to be made within ninety days of the recommendations given by the IC/RC.</p>
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K. Actionable during enquiry

The enquiry Committee / Member/s of the Committee should be prepared to deal with the Complainant's embarrassment and anger by patiently, but firmly, explaining the detail and documentation that are needed for an accurate enquiry.

- i. The Complainant should be interviewed first, to ensure that all-important details and witnesses are identified promptly and if any material object is provided the same should be received, numbered and preserved.
- ii. It is important for the respective RC / IC to be objective and non-judgmental and allow the Respondent to respond to each allegation. The respective RC / IC should inform the Respondent of the type of disciplinary action that may be taken if the Complaints are found to be true.
- iii. Both parties should be told to avoid contact with one another, and ways to minimize contact should be implemented.
- iv. In the event the Complainant has filed a complaint against his/her reporting manager, or any person placed high on hierarchy then during the course of the enquiry the Complainant may:
 - a. Either seek a transfer, OR
 - b. Take leave from employment for a maximum period of 3 months (additional to the entitled employment leaves). OR
 - c. Grant such other relief to the aggrieved woman as may be prescribed.
- v. The Complainant should report any further incidents of harassment or retaliation during the continuation of enquiry.
- vi. Witnesses should be told as little as possible about the details of the Complaint to maintain confidentiality under the Policy.

L. Penal Consequences

The Penal consequences to be recommended by IC. Depending upon the severity / intention / impact of the case the recommendations may be suggested. However, they may lead to termination of employment or Wage / salary loss or maybe considered for Criminal actions with concerned administrative authority.

M. Reporting

At the end of every Financial Year an Annual Report containing all the details like the number of complaints filed, the stage of each Complaint and number of Complaints redressed will be prepared and furnished by the respective Employer to the respective local District Commissioner / D. M. / Officer.

N. Criminal Proceedings

	<ul style="list-style-type: none"> i. Where such conduct amounts to a specific offence under the Indian Penal Code or under any other law, the respective Employer (as the case may be) based on the findings and advice of the respective RC/ IC may initiate appropriate action in accordance with law by making a complaint with the appropriate authorities. A detailed list of penal section involving sexual harassment is provided in Schedule C, herein. ii. The respective RC/ IC would provide assistance to the aggrieved if they chose to file Complaint under the Indian Penal Code. iii. The respective RC/ IC would ensure that Complainants or witnesses are not victimized or discriminated against while dealing with complaints of sexual harassment. <p>O. Mala Fide Complaints</p> <ul style="list-style-type: none"> i. If the enquiry reveals that the Complaint is unjustified or Complainant had raised the concern with ulterior motives, Employer or any person duly authorized by the Employer will counsel the Complainant and recommend suitable action to prevent a recurrence. ii. However, the Employer or any person duly authorized by the Employer will ensure that the Complainant is not victimized. iii. Requisite penal actions, as mentioned in Schedule C may be invoked against Mala Fide Complainant. <p>P. Professional Consequence of Violation of the Policy</p> <ul style="list-style-type: none"> i. Any employee, supervisor or manager who is found to have violated the harassment policy (whether sexually harassing another employee of the opposite sex or the same sex or if any person falsely accuses another person of sexual harassment) shall be subject to appropriate disciplinary action. ii. In the event, any criminal proceedings are initiated the matter may be referred to Group Head Legal or such other person as may be authorized by the Employer. iii. The organization shall not tolerate any form of retaliation against employees for bringing bonafide Complaints or providing information about harassment. iv. However, as per the findings of the enquiry into a Complaint, it is found that the Complaint was false or was made with a mala fide intent; the Complainant may be subject to disciplinary actions, up to and including termination. v. If any act of sexual harassment occurs because of an act or omission by any third party or outsider, the respective Employer will take all steps necessary and reasonable to assist the affected person in terms of support and preventive action.
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SCHEDULE A

List of members in Internal Complaints Committee

Srei Infrastructure Finance Ltd. & Subsidiaries		
Name	Mobile Number	Email ID
Samita Lahiri (Presiding Officer)	9830019276	samita.lahiri@srei.com
Moumita Jana (Secretary)	9051144777	Moumita.jana@srei.com
Agam Bhatnagar	9930303994	Agam.Bhatnagar@srei.com
Gargi Sengupta Sarkar	9836060093	Gargi.Sarkar@srei.com
Ruma Gomes	9883253420	rumabasugomes@gmail.com

SCHEDULE B

Format of the Complaint

Name of Complainant	
Designation	
Organization & Department	
Location	
Date	
Complaint Details in the Report	
	Signature

SCHEDULE C

Applicable Penal Section under Indian Procedure Code and Criminal Procedure Code

1.	IPC Sections 292: Obscenity	First conviction with imprisonment of either description for a term which may extend to two years, and with fine which may extend to two thousand rupees, and, in the event of a second or subsequent conviction, with imprisonment of either description for a term which may extend to five years, and with fine which may extend to five thousand rupees.
2.	IPC Section 293: Obscenity	First conviction with imprisonment of either description for a term which may extend to three years, and with fine which may extend to two thousand rupees, and, in the event of a second or subsequent conviction, with imprisonment of either description for a term which may extend to seven years, and also with fine which may extend to five thousand rupees.

3.	IPC Section 294: Obscenity	Punishment of imprisonment of either description for a term which may extend to three months, or with fine, or with both.
4.	IPC Section 354 A: Sexual Harassment	Punishment of rigorous imprisonment up to five years, or with fine, or with both in case of offence described in clauses (i) & (ii) i.e. Imprisonment up to one year, or with fine, or with both in other cases.
5.	IPC Section 354 B: Sexual Harassment	Punishment of imprisonment not less than three years but which may extend to seven years and with fine.
6.	IPC Section 354 C: Sexual Harassment	In case of first conviction, imprisonment not less than one year, but which may extend to three years, and shall also be liable to fine, and be punished on a second or subsequent conviction, with imprisonment of either description for a term which shall not be less than three years, but which may extend to seven years, and shall also be liable to fine.
7.	IPC Section 354 D: Sexual Harassment	Punishment of imprisonment not less than one year but which may extend to three years and shall also be liable to fine.
8.	IPC Section 376: Rape	Punishment of imprisonment for life or imprisonment for 10 years and other punishments for sexual offences u/s 376A to 376E.
9.	IPC Section 377: Unnatural Offences	Punishment of imprisonment with 1[imprisonment for life], or with sexual imprisonment of either description for a term which may extend to ten years and shall also be liable to fine.
10.	IPC Section 509: Word, Gesture or Act Intended to Outrage Modesty	Punishment of imprisonment of simple imprisonment for a term which may extend to one year, or with fine, or with both. This page has been intentionally kept blank
11.	IPC Section 506: Criminal Intimidation	Punishment of imprisonment of either description for a term which may extend to two years, or with fine, or with both; If threat, be to cause death or grievous hurt etc.- and if the threat be to cause death or grievous hurt, or to cause the destruction of any property by fire, or to cause an offence punishable with death or 3 [imprisonment for life], of with.