



EASY HOME FINANCE LIMITED

DEPARTMENT NAME: HUMAN RESOURCES

PREVENTION OF SEXUAL HARASSMENT POLICY (POSH)

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Description	Signature
Prepared by: Human Resources Department & Compliance Department	
Reviewed by: Nomination & Remuneration Committee	
Approved by: Board of Directors	

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0	Inception	Preliminary	
1	June 22, 2019	First Draft	
2	September 25, 2020	Second Draft	
3	September 17, 2021	Third Draft	
4	August 18, 2023	Fourth Draft	
5	September 05, 2024	Fifth Draft	
6	May 22, 2025	Sixth Draft	
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PREVENTION OF SEXUAL HARASSMENT POLICY (POSH)

Easy Home Finance Limited ("EHFL") is committed to having a workplace which ensures equal employment opportunity. The Company recognizes that sexual harassment violates fundamental rights of gender equality, right to life and liberty and right to work with human dignity guaranteed by the Constitution of India.

The objective of this policy to create a frame-work and mechanism which helps to avoid, eliminate and if necessary, impose punishment for any act of sexual harassment, which includes unwelcome sexually determined behavior.

Applicability

The policy applies to men and women, to similar and opposite gender relationships, to relationships between supervisors and subordinates and peer relationships. Our employees, customers, vendors, consultants, and anyone else doing business on our premises must comply with this policy. This Policy is made on the lines of following enactment – Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal Act), 2013. Provisions of this Act came into force from 9th December, 2013.

The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 statutorily protects women employees. As a matter of EHFL's commitment to a safe and dignified workplace for all, the Company extends similar protections to employees of all genders under this policy. Complaints by women shall be inquired into by the Internal Committee under the provisions of the said Act, and complaints by employees of other genders shall be inquired into by the same Committee under EHFL's administrative anti-harassment standards, applying analogous principles of fair inquiry, confidentiality and natural justice.

Definitions:

- "Complaint" includes concern/grievances by any aggrieved employee, raised under this policy.
- "Act" means "The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013" and any amendment thereto.
- "Aggrieved Employee" means any Employee of EHFL or any person who alleges to have been subjected to any act of Sexual Harassment at the Workplace.
- "Employee" means a person employed at a workplace for any work on regular, temporary, ad hoc or daily wage basis, either directly or through an agent, including a contractor, with or without the knowledge of the EHFL, 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;
- "Internal Committee" means a committee by that name, constituted by the EHFL as per the provisions of the Act.
- "Member" means a Member of the Committee;
- "Management" under this policy shall include the Executive Directors/Head Human Resource/any other person as may be authorized by management committee.

- “Management Committee” means a committee by that name, constituted by the Board of the EHFL from the management & administrative perspective and includes Managing Director, Whole Time Director, Chief Executive Officer, Chief Financial Officer, Company Secretary.
- “Nomination and Remuneration Committee” means a committee by that name, constituted by the Board, also known as Board Committee as per the provisions of the Companies Act, 2013.
- “Respondent” means the person against whom the allegation of Sexual Harassment has been made by the Aggrieved Employee.
- "Harassment" means any behavior that exhibits hostility or aversion towards an individual because of that person's race, color, religion, gender, national origin, age, disability, sexual orientation, or other protected characteristics.
- “workplace” includes-
 - (i) any private sector organisation or a private venture, undertaking, enterprise, institution, establishment, society, trust, non-governmental organisation, unit or service provider carrying on commercial, professional, vocational, educational, entertainment, industrial, health services or financial activities including production, supply, sale, distribution or service;
 - (ii) EHFL's Head Office and its branches
 - (iii) any place visited by the employee arising out of or during the course of employment including transportation by the EHFL for undertaking such journey;
- “Sexual Harassment” includes any one or more of the following unwelcome acts or behavior (whether directly or by implication) namely: -
 - (i) physical contact and advances; or
 - (ii) a demand or request for sexual favours; or
 - (iii) making sexually coloured remarks; or
 - (iv) showing pornography; or
 - (v) any other unwelcome physical, verbal or non-verbal conduct of sexual nature;

The following circumstances, amongst the other circumstances, if occurs or is present in relation to or connected with any act or behavior of sexual harassment may amount to the same:

- Implied or explicit promise of preferential treatment in his/her employment; or
- Implied or explicit threat of detrimental treatment in his/her employment;
- Implied or explicit threat about his/her present or future employment status;
- Interference with his/her work or creating an intimidating or offensive or hostile work environment for him/her;
- Humiliating treatment likely to affect his/her health and safety.

☐ Conduct that implies granting or withholding favors or opportunities as a basis for decisions affecting an individual in return for that individual's compliance. Such incidents occur when an employer, supervisor, member of management or co-employee, undertakes or attempts to influence the process of employment, process of employment promotion, training, discipline, dismissal, salary increment or other benefit of an employee, in exchange for sexual favors. This also includes unreasonably interfering with individual's work performance or creating an intimidating hostile or offensive work environment.

Any form of sexual attention becomes harassment when it is 'unwelcome'. Whether the perpetrator intentionally or unintentionally sexually harasses a person is not the issue. How the person, at

whom it is directed, receives that behavior is crucial because of the subjective nature of sexual harassment.

All complaints will be thoroughly investigated and will be treated with a manner of confidentiality consistent with the resolution of the problem. If the allegations are found to be true following investigation, appropriate corrective action will be taken and it required can lead to the discharge of the offending employee(s). If one believes that he / she has been a victim of harassment or knows of another employee who has been subject to such harassment, it should be reported immediately. Employees can raise concerns and make reports without fear of reprisal. Employees are encouraged to report to the management/ management committee any incident of harassment they may witness. Retaliation against an individual for bringing or corroborating harassment or discrimination allegations is strictly prohibited, so long as such allegations or corroborations are made in good faith and are not knowingly false.

Scope

The policy applies to men and women, to similar and opposite gender relationships, to relationships between supervisors and subordinates, to peer relationships, to employees, to customers, to vendors, to consultants and to anyone else doing business on EHFL premises must comply with this policy.

Any such complaint received under the Sexual Harassment Policy will fall under the purview of the policy defined hereunder and will be dealt with accordingly.

Internal Committee

The policy mandates to form an 'Internal Committee ' Minimum 3 officials from the panel listed below may be selected to address complaints raised. The committee would be headed by a woman.

The 'Internal Committee' will currently have the following composition:

- a. The Committee shall have minimum 4 members at any given time; out of which majority would be women members. The same constitution shall be followed at Head-Office and at Branch level.
- b. A presiding officer who shall be a woman employed at a senior level at workplace from amongst the employees.
- c. The members of the committee should possess requisite experience in social work and should have sound legal and related administrative knowledge. Not less than two members from amongst employees preferably committed to the cause of woman or who have had experience in social work or have legal knowledge.
- d. one member from amongst non-governmental organisations or associations committed to the cause of women or a person familiar with the issues relating to sexual harassment:

To carry out the investigation, any 3 active committee members will form the quorum of the committee provided the Presiding Officer is present (Women representation on panel will be more than 50% at any time and the committee would always be headed by a female employee). The presiding officer and every member of the Internal Committee shall hold office for such period, not exceeding 3 years, from the date of nomination as may be specified by the employer.

For the purpose of making an enquiry, the Internal Committee as the case maybe – shall have the same powers as are vested in a Civil Court under the Code of Civil Procedure, 1908 when trying a suit in respect of the following matters:

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

Investigation Process

- The Aggrieved Employee is required to provide a written complaint or an email complaint on posh.complaint@easyhfc.com, to the Human Resource Department (HRD) directly or through his/her Reporting Authority or to the members of the Internal Committee, within a period of 3 months of such incident.
- The Committee may, for the reasons to be recorded in writing, extend the time limit, if it is satisfied that there were unavoidable circumstances which prevented the Aggrieved Employee from filing a complaint within the said period. Where an Aggrieved Employee is unable to make a complaint on account of his/her physical or mental incapacity, or death or otherwise, his/her legal heir or such other person as may be prescribed under the Act or Rules made thereunder may make a complaint.
- Committee at the earliest and in any case within 15 days from the date of receipt of the complaint, shall set-up the inquiry.
- The Complaint should contain all the material and relevant details concerning the alleged discrimination including the name of the contravener/respondent.
- The identity of the parties involved will be kept confidential by the Internal Committee to the extent possible given the legitimate needs of law and the investigation.
- The Internal Committee will hold an enquiry into the matter. The committee would be entitled to elicit all forms of evidence in this regard and the concerned parties would be required to co-operate.
- Both parties will be given an opportunity to present their views to the Internal Committee during the investigation process.
- In the event that the Internal Committee arrives at the conclusion that there is no case for Sexual Harassment, then the complaint may be dropped by the Internal Committee, and it shall notify the management committee of EHFL of the same.
- It is further clarified that the management committee is authorized to take up all the complaints under this policy with a post reporting to the NRC and in the event that a complaint has been lodged against the member of the management committee, the NRC shall be authorized to take up the complaint with a post reporting to the Board.
- On the completion of such inquiry within 90 days from the date of the receipt of the complaint, the internal committee shall provide the report of its findings to the management committee within a period of 10 days from the date of completion of enquiry and such report be made available to the concerned parties. The management committee shall act upon the recommendation within 60 days of its receipt.
- Interim Reliefs during pendency of inquiry: During the pendency of an inquiry, on a written request made by the Aggrieved Employee, the Internal Committee may recommend to the management committee to (a) transfer the Aggrieved Employee or the Respondent to any other workplace; (b) grant leave to the Aggrieved Employee for a period of up to three months, which shall be in addition to the leave she would otherwise be

entitled to; (c) restrain the Respondent from reporting on the work performance of the Aggrieved Employee or writing her confidential report; or (d) grant such other relief as may be appropriate. The leave granted under this clause and the period of such leave shall not affect any other leave entitlement of the Aggrieved Employee.

- Where sexual harassment occurs as a result of an act or omission by any third party or outsider, the employer and person in charge will take all steps necessary and reasonable to assist the affected person in terms of support and preventive action.
- Conciliation: The Internal Committee may, before initiating an inquiry, at the request of the complainant take steps to settle the matter between him/her and the Respondent through conciliation. However, no monetary settlement shall be made the basis of the conciliation. Where a settlement has been arrived at as mentioned above, the Internal Committee shall record the settlement so arrived at and forward the same to the management committee of EHFL to take action as specified in the recommendation and shall provide copies of the settlement to the complainant and the Respondent.
- Punishment for false complaints: Where the Internal Committee arrives at a conclusion during or after the inquiry that the allegation against the Respondent is either malicious or false, appropriate punitive action may be taken by the management committee against the Aggrieved Employee, as per service rules applicable on recommendations of the committee.

Responsibility of the Internal Committee

The EHFL - Internal Committee will make an annual report of the complaints and actions taken to the Government department concerned. The committee and person in charge will also report on the compliance with the aforesaid guidelines including on the reports of the Internal Committee to the Government department. The appropriate gov shall monitor the implementation of this Act and maintain data on the number of cases filed and disposed of in respect of cases of sexual harassment at workplace.

Retention of Documents

All complaints in writing along with the results of investigation relating thereto shall be retained with the Company by the Human Resource Department or any other person authorized by management committee.

Confidentiality

It is understood that sexual harassment is an issue which is highly sensitive in nature & therefore the management & the committee under all circumstances will maintain strict confidentiality. The committee shall also maintain privacy of records of all the grievances, procedures & disciplinary action undertaken.

Employer Duties:

EHFL shall:

- Provide a safe working environment at the workplace which shall include safety from the persons coming into contact at the workplace.
- Display at any conspicuous place in the workplace, the penal consequences of sexual harassment; and the order constituting Internal Committee .

- Organize workshops and awareness programs at regular intervals for sensitizing the employees with the rules made herein and orientation programs for the members of the Internal Committee as may be prescribed.
- Provide necessary facilities to Internal Committee for dealing with complaints and conducting an inquiry.
- Assist in securing the attendance of respondent and witnesses before the Internal Committee.
- Provide assistance to the aggrieved employee if he/she chooses to file a complaint in relation to the offence under the Bharatiya Nyaya Sanhita, 2023 or any other law for the time being in force.
- Treat sexual harassment as a misconduct under the services rules and initiate action for such misconduct.
- Monitor the timely submission of reports by Internal Committee

Employee Guidelines

The Primary focus of this policy is to ensure a congenial work environment that is free from threat or fear. There are a few things you can do to help translate the policy into day-to-day practices.

- Sexual harassment can take many forms: spoken, unspoken or physical. Recognize that you may be conditioned to accept behaviors that infringe on your rights and constitute discriminate or gender discrimination as normal workplace conduct.
- Firmly say No. it is possible that the offender does not know that his/her behavior is unacceptable to you. Promptly make a direct statement and communicate that the offender's conduct is not acceptable to you.
- Participating in jokes and sexually tinged conversation is often taken as tacit permission to continue. Communicate early on that this conduct is unacceptable to you.
- Warn the offender to immediately desist, first orally and then if necessary, follow it up with a warning in writing.
- Assess the situation and appropriately time your complaint.
- If you are unsure of the course of action to take in a given situation, we encourage you to approach any of the Committee employees informally and take their counsel.
- We also encourage you to discuss any issues you may have in this area to your Supervisor/HR representative/any employee of the 'Internal Committee'.
- If you believe you have been a victim of harassment, or know of another employee who has been, report it immediately. Employees can raise concerns and make reports without fear of reprisal. Employees are encouraged to report to the management any incident of harassment they may witness. Retaliation against an individual for bringing or corroborating harassment or discrimination allegations is strictly prohibited, so long as such allegations or corroboration are made in good faith and are not knowingly false.

Complaints/Appeal by the Aggrieved Employee:

- Any person aggrieved from the recommendations made by the Internal Committee , enquiring with the allegations against the respondent has not proved, or the committee arrived at a conclusion that during the enquiry any witness has given false evidence or produced any forged or misleading documents or contravenes the rules of the act made

thereunder or when the person entrusted with the duty to handle or deal with the complaint, the enquiry or recommendations makes known the contents of the complaint and the enquiry of the proceedings or non-implementation of such recommendations, may prefer an appeal or further raise of their complaints to the appropriate authority. The appeal shall be preferred within 90 days of the recommendations.

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