

**PREVENTION OF SEXUAL HARASSMENT AT WORKPLACE POLICY**  
**OF**  
**NAVI FINSERV LIMITED**

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<b>Date of Review/ Amendment</b>	<b>Version</b>	<b>Particulars</b>	<b>Effective from (Date)</b>	<b>Next date of review</b>
1-September-2025	9.0	Periodic review of the Policy	1-September-2025	No later than August 31,2028

20-May-2024	8.0	Siri Prasad has been appointed as the external member of Internal Committee, replacing Kirtika N. Mandatory POSH Training Clauses has Been Added to the Policy	20-May-2024	
03- May-2024	7.0	Arjun Chadha has been added as a new member of the Internal Committee	03- May-2024	
29-Apr-2024	6.0	Swathi Hebbar has been added as a new member of the Internal committee, replacing Aby George.	29-Apr-2024	
1-Apr-2024	5.0	Manaswini Malladi has been appointed as the Presiding officer replacing Aishwarya Prasad  Mounika Gajawada has been appointed as a member of the Internal Committee replacing Anisha Pareek  Sujatha P has been appointed as a member of the Internal Committee replacing Sachin Shah	1-Apr-2024	
1-Dec-2023	4.0	Aishwarya Prasad has been appointed as Presiding Officer, replacing Shivee Bhardwaj.	1-Dec-2023	
1-Oct-2023	3.0	Shivee Bhardwaj has been appointed as the Presiding Officer.  Anisha Pareek was moved from the Presiding Officer role to a member of the Internal Committee.	1-June-2023	
1-Apr-2023	2.0	Aby George, Shivee Bhardwaj, and Sachin Shah have been appointed as new members of the internal Committee, replacing the previous members.	1-Apr-2023	
1-Jan-2023	1.0	Shreya Bajaj is added as a new member of the Internal Committee, replacing Manan Vaidya. Policy adopted.	1-Jan-2023	

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## PREVENTION OF SEXUAL HARASSMENT AT WORKPLACE POLICY

### 1. OBJECTIVES

- 1.1 Navi Finserv Limited (the “**Company**”) is a Non-Banking Financial Company - Investment and Credit Company (NBFC-ICC), placed at present in the Middle Layer of the Reserve Bank of India (“**RBI**”)’s regulatory structure.
- 1.2 The Company is committed to a workplace where everyone feels respected, safe, and free from sexual harassment, gender bias, or prejudice. The Company aims to support professional growth and ensure equal opportunities for all employees.
- 1.3 Regulatory Background:
- (i) Section 19 of the Act (*as defined hereinafter*) outlines the employers’ duties which includes providing a safe working environment at the workplace.
  - (ii) Accordingly, the Company has adopted this Prevention of Sexual Harassment at Workplace Policy (“**Policy**”) to establish a comprehensive framework outlining *inter alia* scope, complaint, inquiry and redressal mechanism, conciliation, constitution of the Internal Committee, confidentiality and compensation etc.,
  - (iii) The Policy is drafted bearing in mind the provisions and applicability of the Act, and the rules framed thereunder as well as the Company’s Code of Conduct.

### 2. DEFINITIONS

- 2.1 “**Act**” means the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, together with the rules and regulations issued thereunder, and as amended from time to time.
- 2.2 “**Applicable Law(s)**” shall mean any statute, law, regulation, ordinance, rule, judgment, order, decree, clearance, approval, directive, guideline, policy, or other governmental restriction or any similar form of decision, or determination by, or any interpretation or administration of any of the foregoing by, any governmental agency, and in each case as amended or modified.
- 2.3 “**Complainant**” shall mean the individual filing a Complaint.
- 2.4 “**Complaint**” shall mean a written allegation made by an aggrieved Employee, individually or through a representative (where the Employee is incapable of making such Complaint by themselves), regarding any act of Sexual Harassment at the Workplace, as defined under this Policy and in accordance with the provisions of the Act.
- 2.5 “**Employee**” shall mean a person employed at the Workplace for any work on a regular, temporary, ad hoc or daily wage basis, either directly or through an agent, including a contractor, with or, without the knowledge of the Company, 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.
- 2.6 “**Internal Committee**” shall mean the Internal Complaints Committee constituted under Section 5 of this Policy.

- 2.7 **“Respondent”** the individual against whose actions the Complaint has been filed, including anyone associated with the Company in a full-time/part-time capacity as a permanent or temporary employee, contractor, consultant, vendor, intern, trainee, probationer, apprentice or a volunteer. In a situation where the allegation of Sexual Harassment is made against a third party, the Company will work with the direct employer of the alleged offender to decide how the matter should be dealt with.
- 2.8 **“Sexual Harassment”** shall have the meaning assigned to in Section 4 of this Policy.
- 2.9 **“Witness”** shall mean individuals who have been called upon by either the Complainant or Respondent to report their statements as part of the inquiry proceedings.
- 2.10 **“Workplace”** shall mean to include any place visited by the Employee arising out of or during the course of employment. The Workplace includes:
- (a) All offices or other premises where the Company’s business is conducted;
  - (b) Any other site away from the Company’s premises where Company-related activities are performed (example, off-sites or Company organized social events);
  - (c) Any meetings, webinars or discussions that are organized online through applications such as Zoom, Microsoft Teams, Google Meet, WebEx or any other online platform;
  - (d) Any social, business or other events related to the Company’s work where any conduct or comments may have an adverse impact on the Workplace or Workplace relations; and
  - (e) Accommodation or transportation provided by the Company to undertake a professional journey.

### 3. **SCOPE AND APPLICABILITY OF THE POLICY**

- 3.1 This is a gender-neutral Policy and is applicable to all categories of Employees and at all the Workplaces of the Company. All Complaints will be dealt with in a just and fair manner and may have serious consequences. The Company will not tolerate any form of Sexual Harassment engaged in by Employees, clients, visitors, trainees, third parties or by external vendors or any other business associates of the Company and is committed to taking all necessary steps to ensure the safety and well-being of all Employees and associates.
- 3.2 This Policy is separate from and in addition to the Company’s Code of Conduct applicable to all employees.

### 4. **DEFINITION OF SEXUAL HARASSMENT**

- 4.1 During the inquiry, the focus of the Internal Committee shall be on the impact of the Respondent’s behavior on the Complainant, rather than the Respondent’s intent. The determination of whether Sexual Harassment has occurred shall be based on the experience and perception of the Complainant, and not on the Respondent’s stated or perceived intention.
- 4.2 The following unwelcome acts or behaviors either occurring individually, as a combination of individual acts or collectively may constitute **“Sexual Harassment”** at the Workplace (whether directly or by implication) namely:
- (a) Physical contact and advances;
  - (b) A demand or request for sexual favors;

- (c) Making sexually colored remarks;
- (d) Showing pornography; and
- (e) Any other unwelcome physical, verbal or non-verbal conduct of sexual nature.

4.3 When any such act or acts are committed in circumstances where such conduct is humiliating and is likely to constitute a health and safety problem, it will amount to Sexual Harassment that violates this Policy. The following circumstances, among other circumstances, if it occurs or is present in relation to or connected with any act or behavior of Sexual Harassment may amount to Sexual Harassment:-

- (a) Implied or explicit promise of preferential treatment in the employment;
- (b) Implied or explicit threat of detrimental treatment in the employment;
- (c) Implied or explicit threat about the present or future employment status;
- (d) Interference with work or creating an intimidating, offensive or hostile work environment; and
- (e) Humiliating treatment likely to affect health and safety.

4.4 In addition to the above, the following acts below are also considered Sexual Harassment in the Workplace. This includes but is not restricted to:

- (a) Unwelcome sexual advances (verbal, written or physical);
- (b) Sexually colored remarks, including but not limited to vulgar/indecent jokes; innuendos or taunts; letters, phone calls, text messages, e-mails with a sexual message and sexually suggestive gestures;
- (c) Showing pornographic content or the like;
- (d) Giving gifts or leaving objects that are sexually suggestive;
- (e) Repeatedly asking someone to socialize during off-duty hours or continued expression of sexual interest against a person's wishes;
- (f) Any other unwelcome physical, verbal, or nonverbal sexually-oriented conduct, including but not limited to teasing, voyeurism, persistently contacting someone, physical confinement; and
- (g) Unwelcome physical contact, overtones, and advances such as touching, stalking, sounds which might have implicit/explicit sexual connotation/overtones. Ignorance of this Policy will not be considered an excuse during an incident.

## 5. **INTERNAL COMPLAINTS COMMITTEE**

5.1 Composition of the Internal Committee:

- (a) The Internal Committee shall comprise of:
  - (i) Presiding Officer: A woman employed at a senior level in the Company;
  - (ii) Members: At least two (2) Employees, committed to the cause of women or who have had experience of social work or have legal knowledge;
  - (iii) External Member: One external member from amongst non-governmental organizations or associations committed to the cause of women or person familiar with issues relating to sexual harassment.
- (b) The Internal Committee shall, at all times, comprise at least fifty percent women members and shall be headed by the Presiding Officer.
- (c) A person (other than the external member) shall cease to hold office as a member of the Internal Committee if he/she ceases to be an employee of the Company, on account of resignation, termination, or death or for any other reason whatsoever, and in such case the vacancy shall be filled immediately by the Company.
- (d) The Presiding Officer and every member of the Internal Committee shall hold office for such period, not exceeding three years, from the date of their nomination.
- (e) In case of a Complaint where either the Respondent is senior in position to any of the Employees who are members of the Internal Committee or directly/indirectly related to any member of the Internal Committee, the Company shall ensure that such member is replaced with another Employee who is either at same level or senior and/or unrelated to the Respondent within the Company.
- (f) If a Complaint is raised against one of the member/s of the Internal Committee, and/or their direct reportee, such Committee member will not participate in the deliberation and decision making by the Internal Committee. The Internal Committee shall be responsible to make the final decision on all cases of Sexual Harassment.
- (g) The names and contact details of the members of the Internal Committee shall be displayed on the notice board of the Company's premises and in this Policy (**Annexure I**).

5.2 Where the Presiding Officer or any Member of the Internal Committee, (a) contravenes the provisions of Section 16 of the Act or Section 11 of this Policy relating to confidentiality of proceedings before the Internal Committee; or (b) 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 (c) he/ she has been found guilty in any disciplinary proceedings or a disciplinary proceeding is pending against him/her; or (d) 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 Internal Committee and the vacancy so created or any casual vacancy shall be filled by fresh nomination in accordance with the provisions of this Section 5.

5.3 **Responsibilities of the Internal Committee:** The Internal Committee shall be responsible for receiving Complaints, conducting an inquiry into every Complaint of Sexual Harassment, submitting findings upon the inquiry, and making recommendations to the Company on the actions to be taken against the Respondent in line with this Policy and as maybe required under the Act.

5.4 **Receiving a Complaint:** Dealing with incidents of harassment is fundamentally different from handling other workplace disputes. Complainants may feel embarrassed, distressed, or emotionally overwhelmed. As such, receiving a Complaint requires a high degree of sensitivity, tact, and discretion. The following points should be kept in mind by the Internal Committee and the Company when receiving the Complaint:

- (a) **Serious Consideration of Complaints:** All Complaints shall be received with seriousness and empathy. The Complainant shall be informed that the Company takes such concerns seriously and that the matter will be referred to the Internal Committee for appropriate action in a prompt and timely manner.
- (b) **Impartial and Accurate Documentation:** The receiver shall not pre-judge the situation and shall maintain a neutral approach. Written notes shall be taken during the interaction, using the Complainant's own words wherever possible. A clear, factual, and concise description of the incident shall be recorded, and the details shall be verified with the Complainant for accuracy.
- (c) **Confidentiality of Records:** All written records and related information shall be maintained in strict confidence. The Complainant's consent shall be obtained before initiating a formal inquiry into the matter.
- (d) **Disclosure of Identity:** The Complainant shall be informed that while confidentiality will be maintained to the extent possible, the identity of the Complainant may be disclosed to the Respondent, Witnesses, or others directly involved in the inquiry process, in line with the principles of natural justice.
- (e) **Protection from Victimization:** The Company shall ensure that neither the Complainant nor the Respondent is subjected to any form of disadvantage, retaliation, or victimization during or after the inquiry process.

## 6. COMPLAINT MECHANISM

6.1 The Company is committed to providing a supportive environment in which the concerns of Sexual Harassment shall be resolved as follows:

- (i) **Complaint:** When an incident of Sexual Harassment occurs, a Complainant may make a written Complaint to the Presiding Officer or any member of the Internal Committee. The Complainant may also file a physical copy of the Complaint through a sealed envelope or send it through an email to [posh.nfs@navi.com](mailto:posh.nfs@navi.com).
- (ii) **Components of the Complaint:** Complaints should be in writing, *provided* that where such Complaint cannot 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.
- (iii) Complaints should disclose:
  - (a) The identity, designation of the Complainant and the identity of the Respondent against whom the Complaint is being lodged;
  - (b) The dates, time and location of the incident or incidents, since these are useful for speedy redressal;

- (c) The identities, designation, contact information of any other Employee who may have witnessed the incident (if any); and
  - (d) Other relevant documented evidence (if available).
- (iv) **Time Period:** The Complaint should be made, preferably no later than three months from the date of the incident. If the incidents are continuous or have occurred more than once then the Complaint should be made within three months since the most recent incident. The time period of three months for filing the Complaint may be extended by the Internal Committee at its discretion for an additional three months if it is satisfied that the circumstances were such which prevented the Complainant from filing of the Complaint within the period of three months. The reasons for an extension will be recorded in writing by the Internal Committee in its final report.
- (v) Where the Employee is unable to make a Complaint on their own:
- (a) Due to physical incapacity: A Complaint may be filed by the Employee's legal heir, relative, friend, co-worker, or any person having knowledge of the incident, with the Employee's written consent. In case the Complainant is a woman, the Complaint may also be filed by an officer of the National Commission for Women or the State Women's Commission.
  - (b) Due to mental incapacity: A Complaint may be filed by the Employee's legal heir, relative, friend, a special educator, a qualified psychiatrist or psychologist, or the guardian or authority under whose care the Employee is receiving treatment or care. It may also be filed by any person having knowledge of the incident, provided it is done jointly with the aforementioned individuals.
  - (c) where the Complainant 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 her written consent;
  - (d) where the aggrieved party is dead, a Complaint may be filed by any person who has knowledge of the incident, with the written consent of her legal heir.

6.2 **Initial Internal Committee Meeting:** The Internal Committee shall conduct a meeting with the Complainant at the earliest opportunity, and in any case, no later than seven (7) days from receipt of the Complaint. During this meeting, the Committee shall hear the Complainant, document the allegations, and encourage the submission of any supporting material, such as documentary evidence, oral or written statements, or other relevant information to substantiate the Complaint.

If, upon preliminary assessment, the Internal Committee concludes that the Complaint does not *prima facie* fall within the scope of Sexual Harassment as defined under the Policy, the Internal Committee shall refer the Complaint to the appropriate authority or forum competent to address the matter.

## 7. CONCILIATION

- 7.1 Upon receiving the Complaint, the Committee may before initiating the inquiry and at the request of the Complainant take steps to conciliate the Complaint between the Complainant and the Respondent.
- 7.2 There shall be no monetary settlement as basis of conciliation.
- 7.3 Conciliation shall not necessarily mean acceptance of charges by the Respondent.
- 7.4 If both Complainant and Respondent have agreed for a settlement, the Internal Committee shall record such settlement, signed by both the Parties and forward the same to the Company to take actions specified in the recommendation.
- 7.5 The Internal Committee shall provide copies of settlement as recorded to the Complainant and the Respondent.
- 7.6 Where a settlement is arrived at, no further inquiry shall be conducted by the Internal Committee.
- 7.7 If the Complainant informs the Internal Committee that the Respondent has not complied with any term or condition of the settlement or if no settlement is reached after the conciliation process, an inquiry into the Complaint shall be made by the Internal Committee.
8. **FORMAL INQUIRY**
  - 8.1 The Internal Committee shall initiate the “inquiry” in the following cases:
    - (i) No conciliation is requested by aggrieved person;
    - (ii) Conciliation has not resulted in any settlement;
    - (iii) Complainant informs the Internal Committee that any term or condition of the settlement arrived through conciliation, has not been complied with by Respondent.
  - 8.2 **Quorum:** The quorum for the inquiry proceedings shall be at least three members of the Internal Committee including the Presiding Officer.
  - 8.3 **Attendance at an inquiry hearing:** The Internal Committee will provide a reasonable opportunity of being heard to both, the Complainant and the Respondent.
  - 8.4 **Statement of allegations to Respondent:** Within seven (7) working days from receiving the initial Complaint, the Internal Committee shall forward a copy of the Complaint to the Respondent.
  - 8.5 **Written response from Respondent:** The Respondent shall file his/her reply to the Complaint along with his/her list of documents, and names and addresses of Witnesses, within a period not exceeding ten (10) working days from the date of receipt of the Complaint.
  - 8.6 **Summoning Witnesses:** While conducting the inquiry, the Internal Committee shall call upon such Witnesses as it may deem appropriate. The Complainant and the Respondent will have the right to submit a list of Witnesses. If the Complainant or Respondent desires to cross examine any Witnesses, the Internal Committee shall facilitate the same and record the statements. In case Complainant or Respondent seeks to ask questions to the other party, they may give them to the Internal Committee which shall ask such questions and record the statement of the other party.

- 8.7 **Power to pass ex-parte order:** The Internal Committee shall have the right to conduct and/ or terminate the inquiry proceedings to give an ex-parte decision on the Complaint, after giving advance notice of 15 (fifteen) days in writing, if the Complainant or Respondent fails without sufficient cause to present themselves for 3 (three) consecutive hearings convened by the Presiding Officer.
- 8.8 **Legal representation:** Neither the Complainant nor the Respondent shall have the right to be represented by legal counsel at any stage of inquiry by the Committee.
- 8.9 **Assistance during criminal proceedings:** If the Complainant desires to take criminal action against the Respondent, there shall be no objection by the Internal Committee and the Company. In such an event, the Company shall try and provide all reasonable assistance to the Complainant. The Company may also choose to initiate criminal proceedings against the Respondent.
- 8.10 **Answering Sensitive Questions:** Considering the sensitivity of the case and privacy of the Complainant and Witnesses, Internal Committee shall allow the cross examination to be conducted on Q & A. Such Q & A shall be in writing and duly signed by the Complainant and Respondent.
- 8.11 **Recording of the Proceedings:** All proceedings of the inquiry shall be recorded in writing and shall be duly signed by Complainant, Respondent and Witnesses.
- 8.12 The Company will provide necessary facilities and information to the Internal Committee for dealing with the Complaints and conducting an inquiry.
- 8.13 The Company will provide assistance in securing the attendance of the Respondent and Witnesses before the Internal Committee.
- 8.14 The Company shall provide assistance to the Complainant if they choose to file a Complaint in relation to the offence under the Indian Penal Code 1860, or any other law for the time being in force
- 8.15 The Internal Committee shall, in relation to the Complaints filed by an Employee, have the power of a civil court as provided under the Code of Civil Procedure, 1908 (5 of 1908 ) in respect of the following matters:
- (i) Summoning and enforcing the attendance of any person and examining him/her on oath.
  - (ii) Requiring the discovery and production of the documents.
  - (iii) Any other matter which may be prescribed

## 9. **FINAL REPORT**

- 9.1 **Final Report:** The Internal Committee will complete the inquiry within ninety days of receiving the Complaint. The final report shall be signed by the Presiding Officer on behalf of the Internal Committee, and the same shall be provided to the Company, within a period of ten days from the date of completion of the inquiry, and such report shall be made available to the concerned parties. The Internal Committee shall submit a written report containing the findings and recommendations to the Board of Directors on a quarterly basis for all the Complaints received or closed in the relevant quarter.

- 9.2 **Complaint Unsubstantiated:** Where the Internal Committee concludes that the allegation against the Respondent is not substantiated, it shall record its reasons in writing and recommend that no action be taken in the matter. The Committee shall also ensure that both the Complainant and the Respondent are informed that the matter has been fully and fairly investigated, stands concluded, and that neither party shall face any adverse consequences within the Company as a result of the Complaint.
- 9.3 **Action taken by Company:** The Company will ensure corrective action on the recommendations of the Internal Committee within sixty days of receiving the inquiry report. The Internal Committee will keep the Complainant, and the Respondent informed of the same.
- 9.4 **Appeal:** If a Complainant or Respondent feels that the action taken pursuant to the Complaint of Sexual Harassment does not fully or properly deal with the allegations raised in the Complaint, or , if any party is not satisfied with the recommendation/ decision of the Internal Committee, he/she may appeal to the appellate authority in accordance with the Act within 90 days of the recommendation being communicated. .

#### 10. **INTERIM PROTECTION**

The Internal Committee is empowered to issue certain interim orders during the pendency of the inquiry on the written request of the Complainant. These include:

- 10.1 A transfer of the Complainant or of the Respondent to another Workplace;
- 10.2 Grant of leave to the Complainant for a period up to three months. The aforesaid leave from work would be in addition to the leave sanctioned under the leave policy of the Company;
- 10.3 Restraint on the Respondent from reporting on the work performance of the Complainant or from writing their confidential report, and assigning the said task to another officer;
- 10.4 Ensuring that the Complainant is not subject to appraisal by the Respondent;
- 10.5 Ensuring that there is no retaliation against the Complainant or any of the Witnesses;
- 10.6 Suspension of the Respondent;
- 10.7 Where the Respondent is not an Employee, during the pendency of the investigation of the Complaint and even thereafter, restraining the Respondent from entering any Company premises except for the purpose of attending the Internal Committee proceedings.
- 10.8 Such other relief as may be prescribed under the applicable law, or as the Internal Committee deems fit.

#### 11. **CONFIDENTIALITY AND ACCESS TO REPORTS AND DOCUMENTS**

- 11.1 The Company understands that it is difficult to come forward with a Complaint of Sexual Harassment. Therefore, everyone involved in the proceeding under this Policy or any other Employee privy to any information pertaining to investigations including the witnesses, facilitators, Internal Committee members shall be under a duty to respect and maintain confidentiality of the identities and details of the Complaint and any investigation pertaining to the same.
- 11.2 Special privacy safeguard will be applied to the investigation and Complaints will be handled on the confidential "need to know" basis. A pseudonym may be used in place of the Complainant's name.
- 11.3 The contents of the Complaint made, the identity and addresses of the Complainant, Respondent and Witnesses, any information related to conciliation and inquiry proceedings, recommendation of the Internal Committee, and the action taken by the Company under the provision of this Policy shall not be published, communicated or made known to the public, press and media in any manner.
- 11.4 However, information may be disseminated regarding the justice secured to any victim of Sexual Harassment under this Policy without disclosing the name, address, identity or any other particulars calculated to lead to the identification of the Employee and Witnesses.
- 11.5 All records of Complaints, including contents of meetings, results of the inquiry, and other relevant material will be kept confidential by the Company except where disclosure is required under disciplinary or other remedial processes or where otherwise required by law.
- 11.6 Any person who is entrusted with the duty to handle or deal with the Complaint, inquiry or recommendations or action under this Policy and contravenes the provisions of confidentiality under this Section 11 of this Policy will be liable for penalty INR 5000/- (Rupees Five Thousand only) to the Company.

#### 12. **FALSE OR MALICIOUS COMPLAINT**

- 12.1 Where the Internal Committee arrives at a conclusion that the Complaint against the Respondent is malicious or the Complainant with a malicious intent, had made the Complaint knowing it to be false or the Complainant has produced any forged or misleading document, it may recommend to the Company, as the case may be, to take action against the Complainant in accordance with the provisions of Section 13 (Corrective Action) of this Policy along with the provisions of Section 14 of the Act.
- 12.2 Malicious intent on part of the Complainant can be established only after an inquiry has taken place.
- 12.3 A mere inability to substantiate a Complaint or provide adequate proof must not be inferred as malicious intent, and under such circumstances will not attract action against the Complainant.
- 12.4 Where the Internal Committee arrives at a conclusion that during the inquiry any Witness has given any false evidence or produced any forged or misleading document, it may recommend to the Company / employer of the Witness, to take action in accordance with the provisions of the service rules applicable to the Witness.
- 12.5 These recommendations to be made by the Internal Committee will be similar to the recommendations of disciplinary action to be taken against the Respondent if she/he is found guilty of Sexual Harassment, as stipulated under Section 13 (*Corrective Action*).

### 13. **CORRECTIVE ACTION**

- 13.1 Where the Internal Committee arrives at the conclusion that the allegation against the Respondent has been proved, it shall recommend to the Company to take action which may include one or more of the following:
  - (i) Minor punishment:
    - (a) Written apology to the Complainant;
    - (b) Warning Letter;
    - (c) Reprimand or censure;
    - (d) Debarring from supervisory duties;
    - (e) Undergoing counselling session; or
    - (f) Carrying out community service.

- (ii) Major Punishment:
  - (a) Withholding or stoppage or delay of pay rise or increments/promotion.
  - (b) Change of work assignment/transfer for either the Respondent or the Complainant;
  - (c) Termination from service.
  - (d) Transfer to any other company / business location
  - (e) Deduction of salary/wages /adjustment of Full & Final Settlement of the Respondent, of such sum as the Internal Committee may deem appropriate
  - (f) Compensation to be paid to the aggrieved Complainant as per Section 13(3)(ii) of the Act, and Section 14 of this Policy,
  - (g) Demotion,
  - (h) Dismissal with forfeiture of Gratuity, etc
- (iii) The Internal Committee can recommend support by the Company to take criminal action against the Respondent.

#### 14. **COMPENSATION**

- 14.1 Where the Internal Committee arrives at the conclusion that the allegation against the Respondent has been proved, it shall recommend to the Company to deduct, notwithstanding anything in the Applicable Laws, from the salary or wages of the Respondent such sum as it may consider appropriate to be paid to the Complainant or to their legal heirs, as it may determine, in accordance with the provisions of Section 14.4 below of this Policy ("**Compensation**").
- 14.2 In case where the Company is unable to make such deduction from the salary of the Respondent due to absence from duty or cessation of employment, it may direct to the Respondent to pay such sum to the aggrieved Complainant. Further that in case the Respondent fails to pay the sum referred to in Section 14.1, the Internal Committee may forward the order for recovery of the sum as an arrear of land revenue to the concerned District Officer under the Act.
- 14.3 The Respondent shall be solely liable to compensate the Complainant for any financial loss caused due to their actions. While the Company shall not be held financially liable, it will extend reasonable support to the Complainant in this regard.
- 14.4 For the purpose of determining the quantum of Compensation to be provided under Section 14.1 above, the Internal Committee shall have regard to—
  - (i) the mental trauma, pain, suffering and emotional distress caused to the aggrieved Complainant;
  - (ii) the loss in the career opportunity due to the incident of sexual harassment;
  - (iii) medical expenses incurred by the Complainant for physical or psychiatric treatment;
  - (iv) the income and financial status of the respondent; and
  - (v) feasibility of such payment in lump sum or in instalments.

#### 15. **PROTECTION OF COMPLAINANT AND WITNESSES FROM RETALIATION**

- 15.1 The Company will ensure that any Employee subjected to alleged Sexual Harassment or any Employee giving evidence in connection with an instance of alleged Sexual Harassment is not victimized or discriminated against while dealing with Complaints of Sexual Harassment and /or in his/her career in the Company.
- 15.2 Any Employee who retaliates against an Employee who has reported in good faith, a Sexual Harassment claim, will be subject to disciplinary action, which may include dismissal.
- 15.3 Any reprisal will be considered as a separate case of harassment.
- 15.4 In the event that the Complainant or any Witness of the Complainant is being supervised by the Respondent or any of their Witnesses, then such reporting assignments will be changed to the extent possible by the Company.
- 15.5 The Company shall forbid and take necessary steps to prevent any form of retaliation against Witnesses.
16. **AWARENESS AND MANDATORY TRAINING**
  - 16.1 The Company shall conduct training sessions, workshop, awareness programmes for sensitizing the Employees, with the provisions of the Act and on Sexual Harassment. It shall be mandatory that all employees should attend these awareness programmes / training sessions.
  - 16.2 Further, the Company shall carry our orientation programs and seminars for members of the Internal Committee, and conduct capacity building and skill building programmes for members of the Internal Committee.

16.3 In addition to the Mandatory Training prescribed under this Section 16, Employees shall comply with the DOs and DON'Ts outlined in **Annexure II** of this Policy. This list is intended to be illustrative and not exhaustive.

**17. DOCUMENT RETENTION**

17.1 All documents related to reporting, investigation and enforcement pursuant to this Policy shall be kept in accordance with the Company's Policy on Preservation of Documents and Applicable Laws.

**18. ANNUAL REPORT**

18.1 The Internal Committee shall prepare an annual report ("**Annual Report**") at the end of the calendar year and submit such report to the Company, and to the District Officer as maybe required under the Act. The annual report will contain information of Complaints received by the Company.

18.2 The Annual Report shall contain the following details:

- (i) number of Complaints of Sexual Harassment received in the year.
- (ii) number of Complaints disposed off during the year.
- (iii) number of cases pending for more than ninety (90) days.
- (iv) number of workshop or awareness programmes against Sexual Harassment carried out, and
- (v) nature of action taken by the Employer or District Officer.

18.3 The Annual Report shall be placed before the Board for its noting.

**19. REVIEW OR AMENDMENT OF THE POLICY**

19.1 The Policy shall be amended or modified with the approval of the Board. The Policy shall be reviewed by the Board once in three years.

19.2 Without prejudice to the foregoing, in the event the Policy requires to be amended to take into account any changes (whether on account of repeal of any existing law, or otherwise) in any existing regulation, law or policy (or any clarification with respect to any existing regulation, law or policy), the Managing Director of the Company may approve such changes to the Policy as may be required to comply with such changes, or clarifications. Any such changes approved by the Managing Director shall be placed before the Board, in its immediately succeeding meeting, for ratification by the Board.

19.3 Notwithstanding anything contained in this Policy, in case of any contradiction of the provision of this Policy with any existing legislations, rules, regulations, laws or modification thereof or enactment of a new applicable law, the provisions under such law, legislation, rules, regulation or enactment shall prevail over this Policy.

**20. IMPLEMENTATION**

This Section outlines the responsibilities of various Board / management committees in relation to the implementation of this Policy:

<b>Managing Director</b>	Approve any amendments to this Policy on account of changes in any existing law, regulation or Policy, as outlined in <u>Section 19</u> .
<b>Internal Committee</b>	(a) Review all Complaints and make the final decision on disciplinary or remedial action.

	<ul style="list-style-type: none"> <li>(b) Undertake preliminary reviews, undertake conciliations and conduct investigations in accordance with Section 6, Section 7 and Section 8 of the Policy and the Act.</li> <li>(c) Ensure fair adjudication and uphold the principles of natural justice in each case.</li> <li>(d) Coordinate with other Departments (Legal, HR, etc) to ensure thorough and impartial investigations.</li> <li>(e) Prepare and review annual reports of cases reported under the Policy.</li> <li>(f) Provide quarterly reports to the Board of Directors on all Complaints received and disposed off during the quarter.</li> <li>(g) Provide strategic oversight and ensure the integrity of the process followed in handling Complaints.</li> </ul>
<b>Human Resources Department</b>	<ul style="list-style-type: none"> <li>(a) Support the Internal Committee in conducting impartial investigations and implementing appropriate action where necessary.</li> <li>(b) Provide protection to the Complainants facing harassment or threats, including through temporary measures such as leave or relocation.</li> <li>(c) Maintain confidentiality and prevent retaliation throughout the investigation process.</li> <li>(d) Ensure that all employees are trained and made aware of their rights and obligations under this Policy.</li> <li>(e) Conduct periodic training sessions and awareness campaigns across employee levels.</li> </ul>
<b>Legal Department</b>	<ul style="list-style-type: none"> <li>(a) Advise the Internal Committee on legal aspects of reported cases and ensure compliance with applicable laws.</li> <li>(b) Assist in conducting legally sound investigations and guide on potential regulatory consequences of reported violations.</li> <li>(c) Ensure confidentiality of all disclosures and provide legal support in cases requiring external reporting or prosecution.</li> </ul>
<b>Employees</b>	<ul style="list-style-type: none"> <li>(a) Read and understand the Policy;</li> <li>(b) Take reasonable care not to offend co-workers and associates through one's actions or behavior;</li> <li>(c) Take responsibility to discourage unwelcome conduct that is offensive, degrading or humiliating;</li> <li>(d) Know who is on the Internal Committee;</li> <li>(e) Cooperate in the inquiry of Complaints when called to do so;</li> </ul>

	<p>(f) Maintain confidentiality at all times in the event that the Employee is involved in or have access to information related to any Complaint that is raised.</p> <p>(g) Cooperate fully during investigations and maintain confidentiality.</p> <p>(h) Refrain from any form of retaliation against the Complainant.</p> <p>(i) Participate in training sessions and stay informed about their rights and obligations under this Policy.</p>
<b>Complainant</b>	<p>(a) Submit detailed and specific Complaints regarding any alleged Sexual Harassment.</p> <p>(b) Refrain from false or malicious reporting.</p> <p>(c) Cooperate during inquiries as required.</p> <p>(d) Maintain confidentiality and respect the investigation process without influencing outcomes.</p>

21. **DISCLOSURES AND ACKNOWLEDGMENT**

- 21.1 The Policy shall be disclosed on the website of the Company, and shall at all times be displayed at all offices of the Company at a prominent place inside the Company’s premises.
- 21.2 A copy of this Policy shall be put up on the notice board of the Company and shall also be available on the intranet of the Company along with other HR Policies and Guidelines. For any clarification on this Policy, an Employee can approach the HR Department of the Company.
- 21.3 Further, the Employees shall share a signed copy of the Acknowledgment to the Policy in the format as given under **Annexure III** of this Policy.

**Annexure I****MEMBERS OF THE INTERNAL COMMITTEE**

<b>NAME</b>	<b>ROLE</b>	<b>EMAIL ADDRESS</b>
Manaswini Malladi	Presiding Officer	<a href="mailto:manaswini.malladi@navi.com">manaswini.malladi@navi.com</a>
Swathi Hebbar	Member	<a href="mailto:swathi.hebbar@navi.com">swathi.hebbar@navi.com</a>
Arshdeep Kaur	Member	<a href="mailto:arshdeep.kaur@navi.com">arshdeep.kaur@navi.com</a>
Tushar Chandel	Member	<a href="mailto:tushar.chandel@navi.com">tushar.chandel@navi.com</a>
Siri Prasad	External Member	<a href="mailto:siri@serein.in">siri@serein.in</a>

## Annexure II

### A. **DOs**

If the Employee has faced Sexual Harassment in the Workplace, the Company advises you to:

- (i) Keep a record of incidents (date, times, locations, possible Witnesses, what happened, your response, etc.). While the Internal Committee understands if you do not have a record of the same, a record of any details can strengthen your case and help you remember details over time.
- (ii) Report incidents of Sexual Harassment as soon as possible after the incident occurs, as it aids in better recall of the incident and helps the Internal Committee better ensure the employee's safety.

### B. **DON'Ts**

Our Company is committed to the safety and well-being of all those associated with us. To ensure that the workplace is safe we would like to list the behaviors we expect employees and associates to avoid:

- (i) Eve teasing;
- (ii) Unwelcome sexual advances or propositions, whether they involve physical touching or not;
- (iii) Comments on personal appearance and individual's body;
- (iv) Sexual comments, innuendoes, gestures, and suggestive or insulting comments;
- (v) Use of lewd, foul, off-color, sexually-oriented language or "dirty" jokes with sexual implications
- (vi) Sexual epithets, written or oral references to sexual conduct, gossip regarding one's sex and personal life;
- (vii) Comments about an individual's sexual activity, deficiencies, or prowess;
- (viii) Leering or staring at another's body and/or sexually suggestive gesturing;
- (ix) Whistling, touching, stroking someone's hair, brushing against another's body, pinching,
- (x) patting, rubbing, grabbing, groping, kissing or fondling another person;
- (xi) Displaying sexually suggestive or explicit objects, posters, pictures, photographs, calendars, cartoons, screen savers or one's own body parts;
- (xii) Sitting in an obscene manner;
- (xiii) Direct or implied inquiries into one's sexual experiences;
- (xiv) The transmission of a sexually offensive email, voicemail, or instant or text messages;
- (xv) Unwelcome repeated requests for dates or outings;
- (xvi) Gender-based insults or sexist remarks;
- (xvii) Unwelcome sexual overtone in any manner such as over telephone (obnoxious telephone calls) and the like such as prank calls, leaving lewd messages on answering machines, SMS, email, or by any other means;
- (xviii) Forcible physical touch or molestation and physical confinement against one's will;

- (xix) Other behavior or acts that make the Workplace intimidating.

**Annexure III**

**Employee Acknowledgment Form**

I, [Employee Full Name], hereby acknowledge that I have received, read, and understood the contents of the Prevention of Sexual Harassment at Workplace Policy ("Policy") of Navi Finserv Limited ("**Company**").

I understand that:

1. The Policy is applicable to all employees, regardless of their level, designation, or nature of employment.
2. The Company is committed to providing a work environment that is free from any form of sexual harassment.
3. I am responsible for complying with the provisions outlined in the Policy and for maintaining a respectful workplace.
4. I am aware of the procedures for reporting incidents and the protections available to complainants.
5. Any violation of this Policy may result in disciplinary action, including termination of employment.

I understand that it is my responsibility to seek clarification from HR or the Internal Committee (IC) if I have questions regarding any part of this Policy.

By signing below, I acknowledge and agree to abide by the Policy.

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Employee Name: \_\_\_\_\_

Employee ID: \_\_\_\_\_

Date: \_\_\_\_\_

Signature: \_\_\_\_\_