

POLICY ON PREVENTION OF SEXUAL HARASSMENT

POLICY ON PREVENTION OF SEXUAL HARASSMENT

POLICY STATEMENT AND OBJECTIVE

This Policy applies to Rent Alpha Private Limited and all its subsidiary and associate company/ies and any other subsidiaries that may be acquired or formed in the future (together called 'Company').

As a Company, we believe in dedicating and, conducting and governing ourselves with ethics, transparency and accountability in order to provide with a healthy working environment for all its employees, without the fear of prejudice or gender bias irrespective to the caste, colour, gender, religion, sexual orientation, age, ethnic origin, marital status or disability. To facilitate this, we have developed governance structures, policies, practices and procedures that ensure ethical conduct at all levels is promoted across our value chain.

The Company also believes that every Associate of the Company is treated with dignity. It is thus in acknowledgement of and consonance with these values, that we are dedicated to ensuring that the work environment at all our locations is conducive to fair, safe and harmonious relations, based on mutual trust and respect, between all the Associates of the Company. We also strive to guarantee a safe and welcoming environment to all those who visit any of our locations in any capacity, such as customers, vendors etc. Discrimination and harassment of any type is strictly prohibited. We wish to promote and maintain this culture to ensure that Associates of the Company do not engage in practices that are abusive in any form or manner whatsoever.

The Company aims to provide a safe working environment and prohibits any form of sexual harassment. Hence any act of sexual harassment or related retaliation against or by any Associate is unacceptable. This Policy therefore, intends to prohibit such occurrences and also details procedures to follow when an Associates believes that a violation of the Policy has occurred within the ambit of all applicable regulations regarding sexual harassment.

All managers to ensure that they themselves as well as their team, including new joinees, are aware of the Policy on Prevention of Sexual Harassment (the "**Policy**") in place and strictly adhere to it.

Company will promptly investigate all complaints and take appropriate action, up to and including termination of employment.

The objective of this Policy is to provide protection against sexual harassment at workplace and for the prevention and redressal of complaints of sexual harassment and formatters connected therewith. All individuals concerned should take cognizance of the fact that Company strongly opposes sexual harassment, and that such behavior against Associate is prohibited by the law as set down in The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and Rules framed thereunder being the Sexual Harassment of Women at Workplace (hereinafter referred to as "**Act**") as well as the terms of employment.

Commission of any act of sexual harassment as defined in the Act and in this Policy shall result in strict [disciplinary/ civil/criminal action].

As a Company, we have zero-tolerance for sexual harassment. We will take very serious disciplinary actions against any victimization of the Aggrieved Associate or the alleged harasser that may result from a complaint. We value each and every Associate working with us and wish to protect their dignity and self-respect. In doing so, we are determined to promote a working environment in which persons of both genders complement each other as equals in an environment that encourages maximum productivity and to keep the personal dignity.

On issues encountered by the Associate, particularly concerning the Policy, we are committed to and will ensure giving each and every Associate a just and fair hearing. Making a false complaint of sexual harassment or providing false information regarding a complaint will also be treated as a violation of Policy.

DEFINITIONS

“Aggrieved Associate” means in relation to a Workplace, any individual, of any age whether employed in the Company or not, who alleges to have been subjected to any act of Sexual Harassment by another associate of the Company.

“Associate” means a person employed at a Workplace for any work on regular, temporary, adhoc or daily wages basis, either directly or through an agent, including a contractor, with or, without the knowledge of the principal employer, 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; in any workplace, any person responsible for the management, supervision and control of the workplace.

“Company” means Rent Alpha Private Limited or any of its Subsidiary or subsidiaries or associate/group companies.

“Complaint” means information, either oral or written, made by the Aggrieved person/ Complainant. However, complaint made orally must be recorded in writing with the assistance of the Internal Complaint Committee members.

“Internal Complaints Committee” means a committee constituted for redressal of complaints by the Aggrieved person and make recommendations for resolution as per this Policy.

“Sexual harassment” includes any unwelcome sexually determined behavior (direct or implied) such as physical contact and advances, unwelcome communications or invitations, demand or request for sexual favors, sexually cultured remarks, showing pornography, creating a hostile work environment and any other unwelcome “sexually determined behavior” (physical, verbal or non-verbal conduct) of a sexual nature.

Additionally, any of the following, in relation to or connected with the above, will constitute sexual harassment: (i) implied or explicit promise of preferential treatment in employment; or (ii) implied or explicit threat of detrimental treatment in employment; or implied or explicit threat about present or future employment status; or interference with their work or creating an intimidating or offensive or hostile work Environment; or (iii) Humiliating treatment likely to affect their health or safety

“Workplace” includes any department, organization, undertaking, establishment, enterprise institution, office or branch unit of the Company. Any place visited by the Associates arising out of or during the course of employment [including transportation provided by the employer for undertaking such journey]

PREVENTION ACTION

The Company will take reasonable steps to ensure prevention of sexual harassment at work which may include circulating applicable policies, pamphlets and other relevant information to all Associates, including to all new joiners. The Company will also conduct seminars which will help Associates understand the importance of this Policy.

INTERNAL COMPLAINTS COMMITTEE

The Company shall have a Internal Complaints Committee (**“ICC”**), to specifically address any complaints of sexual harassment. The Committee will be constituted by the Company and would be headed by a Presiding Officer, who shall be a woman Associate employed at a senior level at workplace from amongst the Associates.

The Committee shall comprise of the following members:

- | | | |
|-------|---------------------------------|-------------------|
| (i) | Ms. Saira Lobo | Presiding Officer |
| (ii) | Ms. Smitha Joseph | Member |
| (iii) | Mr. Dhriti Barman | Member |
| (iv) | Ms. Sonalee Shyamsunder Karekar | NGO Member |

(hereinafter referred to as **“Committee Members”**)

Not less than half of the Committee Members shall be women. The term of the Committee Members shall not exceed 3 years. A minimum of 3 Members of the ICC including the Presiding Officer are to be present for conducting the inquiry.

In addition to the Internal Complaint Committee, the Company also has Disciplinary Committee to ensure the gender equality in the Company. The disciplinary Committee shall consist of the following members:

- | | | |
|------|------------------|-------------------|
| i. | Ganapathy N | Presiding Officer |
| ii. | Abhishek Nair | Member |
| iii. | Salil Srivastava | Member |
| iv. | Karishma Jajoo | Member |

In addition to addressing complaints in relation to sexual harassment, the ICC will also provide forums to co-ordinate sexual harassment free environment at the Workplace, such as:

- a) Sending articles on the importance of a harassment free work environment, from time to time;
- b) display at any conspicuous place in the workplace, the penal consequences of sexual harassments;
- c) organize workshops and awareness seminars at regular intervals for sensitizing the Associates with the provisions of the Act and orientation seminars for the Committee Members in a manner as may be prescribed.

Inclusion or removal of Committee Members shall be on the following ground:

- (i) contravention of the Policy; or
- (ii) contravention of the legal provisions of the act; or
- (iii) has been convicted for an offence or an inquiry into an offence under any law for the time being in force in pending against him; or
- (iv) has been found guilty in any disciplinary proceedings or a disciplinary proceeding is pending against him/her; or
- (v) has so abused his/her position to render his continuance in office prejudicial to the public interest;

Provided that the same shall be approved by Board of the Directors of the Company.

PROCEDURE FOR DEALING WITH COMPLAINTS

1) Filing of a Complaint:

If any Associate believes that she/he has been subjected to sexual harassment, such Aggrieved Associate may file a written complaint with any member of the ICC or Disciplinary Committee or send an email to saira.lopez@rentalpha.com with copy to dhriti.barman@capsavefinance.com, or email to n.ganapathy@rentalpha.com within three (3) months from the date of the incident or in case of series of incident or in case of series of incidents then within a period of three (3) months from the date of last incident (“time period”).

The ICC or Disciplinary Committee may, for the reasons to be recorded in writing, extend the time limit not exceeding (3) months, if it is satisfied that the circumstances were such which prevented the Aggrieved Associate from filing a complaint within the said time period.

In case the complaint cannot be made in writing the Presiding Officer or any member of the ICC or Disciplinary Committee, as the case may be, shall render all reasonable assistance to the Aggrieved Associate for making the complaint in writing.

Where the Aggrieved Associate is unable to make a complaint on account of her physical or mental incapacity or death or otherwise, their legal heir, friends, relatives, co-workers, psychologist, psychiatrists, etc. to file the complaint.

The ICC or Disciplinary Committee may, before initiating an inquiry and at the request of the Aggrieved Associate take steps to settle the matter between the Aggrieved Associate and the respondent through conciliation, provided that no monetary settlement shall be made as a basis of conciliation.

Where a settlement is arrived, no further inquiry shall be conducted by the said Committee, as case may be the Committee shall provide the copies of the settlement as recorded to the Aggrieved Associate, respondent and the Company, for records.

In case the conciliation fails to arrive at a settlement or if the Aggrieved Associate informs the Committee that the terms and conditions of the settlement have not been complied with by the respondent, the concerned Committee shall proceed to make an inquiry into the complaint filed before the Committee.

Complaints brought after that time period will not be pursued absent extraordinary circumstances. The determination of whether the complaint was timely or whether extraordinary circumstances exist to extend the complaint period must be made by the Committee in conjunction with the Legal team of the Company.

Every attempt shall be made to get the Aggrieved Associate to provide the complaint in writing. The complaint shall include the circumstances giving rise to the complaint, the dates of the alleged occurrences, and names of witnesses, if any. The complaint shall be signed by the Aggrieved Associate.

Complaints made anonymously or by a third party must also be investigated to the extent possible.

If the complaint does not rise to the level of sexual harassment, the concerned Committee may determine to dismiss the complaint without further investigation after consultation with legal team.

2) Process of Enquiry

The ICC or Disciplinary Committee will ask the Aggrieved Associate to prepare a detailed statement of incidents/allegations. The Aggrieved Associate maybe required to submit three (3) copies of the complaint along with supporting documents and the names and addresses of the witnesses.

The statement of allegations will be shared with the respondent within seven (7) working days. The respondent will be asked to prepare a response to the statement of allegations, along with the list of documents and names and addresses of the witnesses and submit to the Committee within a period not exceeding ten (10) working days.

The statements and other evidence obtained in the inquiry process will be considered confidential. The Committee will organize verbal hearings with the Aggrieved Associate and the respondent, in accordance with the principle of natural justice.

During the inquiry, the ICC or Disciplinary Committee, as the case may shall make a copy of the findings available to both the Parties enabling them to make representations against the findings before the concerned Committee.

The concerned committee will take testimonies of other relevant persons and review the evidence wherever necessary. The committee should ensure that sufficient care is taken to avoid any retaliation against the witnesses.

During the inquiry process, the complainant and the respondent shall refrain from any form of threat, intimidation or influencing of witnesses. The committee will conduct inquiry in accordance with the practices of natural justice, i.e. both parties will be allowed to cross-examine and vice versa.

The committee will arrive at a decision after carefully and fairly reviewing the circumstances, evidence and relevant statements.

The committee will ensure confidentiality during the inquiry process and will ensure that in the course of investigating a complaint:

- a) Both parties will be given reasonable opportunity to be heard along with witnesses and to produce any other relevant documents;
- b) Upon completion of the investigation, both parties will be informed of the results of the investigation.

The committee will be empowered to do all things necessary to ensure a fair hearing of the complaint including all things necessary to ensure that victims or witnesses are neither victimized nor discriminated against while dealing with a complaint of sexual harassment. In this regard, the committee will also have the discretion to make appropriate interim recommendations in relation to the respondent (pending the outcome of the complaint) including suspension, transfer, leave, change of work location etc.

The ICC Committee in consultation with disciplinary committee shall have the right to terminate the inquiry proceedings or to give ex-parte decision on the complaint, if the Aggrieved Associate or respondent fails, without sufficient cause, to present herself or himself for 3 (three) consecutive hearing convened by the Presiding Officer, provided 15 (fifteen) days advance notice is provided to the party concerned, provided that such termination or ex-parte order may not be passed without giving a notice in writing, fifteen days in advance, to the party concerned.

The investigation into a complaint will be conducted in such a way as to maintain confidentiality to the extent practicable under the circumstances. For the purpose of making an inquiry, the committee shall have the same powers as are vested in the civil court under Code of Civil Procedure, 1908.

The Committee will investigate and prepare an enquiry report with recommendations within ninety (90) days.

The parties to the complaint shall not be allowed to bring in any legal practitioner to represent them in their case at any stage of the proceedings before the Committee.

In conducting the inquiry, a minimum of three members of the Committee including the Presiding Offer, shall be present for the hearing or participate through audio calls.

3) Decision and Action

During the pendency of inquiry, on a written request made by the Aggrieved Associate, the Committee if it deems fit, may recommend to the Company to -

- a) transfer the Aggrieved Associate or the respondent to any other workplace; or
- b) grant leave to the Aggrieved Associate; or
- c) grant such other relief to the Aggrieved Associate as may be prescribed.

The leave granted to the Aggrieved Associate under this section shall be in addition to the leave he/she would be entitled to otherwise if the case is proved.

Once the investigation is completed, the ICC in consultation with Disciplinary Committee shall provide a report of its findings to the Company, within ten (10) days from the date of completion of the inquiry and such report shall be made available to the concerned parties. The Company shall act upon the recommendation of the committee with sixty (60) days of receipt of the report of the Committee.

The committee shall make a determination regarding the validity of the harassment allegations. If it is determined that the harassment has not occurred, it shall recommend to the company that no action is required to be taken in this matter.

If it is determined that harassment has occurred; prompt, remedial action will be taken.

The committee will share the investigation details and the findings thereof with the appropriate functional Head HR and agree on the applicable disciplinary action. This may include some or all of the following:

- a) Restore any lost terms, conditions or benefits of employment to the Aggrieved Associate.
- b) Discipline the respondent. This discipline can include deduction from the salary or wages the amount to be paid to the Aggrieved Associate, demotion, suspension, and termination.

The disciplinary action will be carried out by the concerned HR department. Such disciplinary action may even include transfer, demotion or termination. All related documents will be maintained in the associate's folder, ensuring confidentiality. This policy shall not, however, be used to raise malicious complaints. If a complaint has been made in bad faith, as demonstrated by clear and convincing evidence, disciplinary action which may include demotion, suspension or termination will be taken against the person raising the complaint.

As per the provisions of the Act the employer shall include in its report the number of cases filed, if any, and their disposal under this Act in the annual report of the Company or where no such report is required to be prepared, intimate such number of cases, if any, to the district officer.

4) Determination of Compensation

For the purpose of determining the sums to be paid to the Aggrieved Associate, the Committee shall have to regard the following:

- a) the mental trauma, pain, suffering and emotional distress caused to the Aggrieved Associate;
- b) the loss in the career opportunity due to the incident of sexual harassment;
- c) medical expenses incurred by the victim for physical or psychiatric treatment;
- d) the income and financial status of the respondent; and
- e) feasibility of such payment in lump sum or in installments.

5) Prohibition of Publication or making known of the content of Complaint or Inquiry

The contents of the complaint made under the Policy, identity and addresses of the Aggrieved Associate, respondent and witnesses, any information relating to conciliation and inquiry proceedings, recommendations of the committee and the action taken by the Company shall not be published, communicated or made known to the public, press and media in any manner:

Provided that information may be disseminated regarding the justice secured to any victim of sexual harassment without disclosing the name, address, identity or any other particulars calculated to lead to the identification of the Aggrieved Associate, respondent and witnesses.

6) Duties of the Employer

The Company shall:

- a) provide a safe working environment at the workplace which shall include safety from the persons coming into contact at the workplace;
- b) display at any conspicuous place in the workplace, the penal consequences of sexual harassments;
- c) organize workshops and awareness seminars at regular intervals for sensitizing the Associates with the provisions of the Act and orientation programmes for the Committee Members of in the manner as may be prescribed;
- d) provide necessary facilities to the Committee for dealing with the complaint and conducting an inquiry;
- e) assist in securing the attendance of respondent and witnesses before the Committee;
- f) make available such information to the Committee as it may require having regard to the complaint made;
- g) provide assistance to the Aggrieved Associate if he/she so chooses to file a complaint against the respondent in relation to the offence under the Indian Penal Code or any other law for the time being in force;

- h) cause to initiate action, under the Indian Penal Code or any other law for the time being in force, against the perpetrator, or if the Aggrieved Associate so desires, where the perpetrator is not an Associate, in the workplace at which the incident of sexual harassment took place;
- i) monitor the timely submission of reports by the committee.

ANNEXURE-I

RESPONSIBILITY OF ASSOCIATES

The below is only an indicative list of basic Dos' and Don't and is in no way intended to be construed as an exhaustive list.

Do's

- Know the Company's Policy on Prevention of Sexual Harassment.
- Be aware of inappropriate behaviors and avoid the same.
- Say "**NO**" if asked to go to places, do things or participate in situations that make you uncomfortable.
- Trust your instincts. Walk away from uncomfortable situations.
- Say "**NO**" to offensive behavior as soon as it occurs.
- Refrain from taking discriminatory actions or decisions which are contrary to the spirit of this Policy.
- Maintain confidentiality regarding any aspect of an inquiry to which they may be party to.

Don'ts

- Verbal harassment:
 - Sexually suggestive comments or comments on physical attributes.
 - Offensive language that insults or demeans a colleague, using terms of endearment.
 - Singing or humming vulgar songs.
 - Requests for sexual favours, sexual advances, coerced acts of a sexual nature.
 - Requests for dates or repeated pressure for social contact.
 - Discussing sexual activities, sexual prowess or intruding on the privacy of an associates.
 - Sexually colored propositions, insults or threats.
 - Graffiti in the office premises.

- Nonverbal harassment
 - Offensive gestures, staring, leering or whistling with the intention to discomfort another.
 - Even if not directly done to a particular individual, uttering a word, making a gesture or exhibiting any object with the intention that such word, gesture, or object be heard or seen by associates.
 - Sounds, gestures, display of offensive books, pictures, cartoons, magazines, calendars or derogatory written materials at one's workplace.
 - Showing or mailing pornographic posters, Internet sites, cartoons, drawings.
 - Suggestive letters, phone calls, SMS, electronic instant messaging or e-mail messages.

- Physical harassment
 - Physical contact or advances.
 - Intentional touching of the body, e.g. Hugs, kisses, brushing, fondling, pinching etc. that make others uncomfortable.
 - Any displays of affection that make others uncomfortable or are inappropriate at the workplace.

ANNEXURE- II

Role of the committee:

- Review the complainant's complaint in a fair and objective manner.
- Help the complainant and the respondent find a way of solving the problem.
- Determine the facts of the case with the individuals concerned and the witnesses, if any, and prepare a report with the findings.
- Be bound in the principle of natural justice and be unbiased in their evaluation.