

POLICY FOR PREVENTION OF SEXUAL HARASSMENT (POSH)

PURPOSE

To create and maintain safe work environment, free from sexual harassment & discrimination for all its employees. As per the guidelines of "The Sexual harassment of women at workplace (prevention, prohibition & redressal) Act, 2013".

Our success is based on our people. We treat each other with respect and dignity and expect everyone to promote a sense of personal responsibility. We recruit competent and motivated people who respect our values, provide equal opportunities for their development and advancement; protect their privacy and do not tolerate any form of harassment or discrimination.

The 'Policy on Prevention of Sexual Harassment of women at workplace: Guidelines for ADANI CAPITAL PVT LTD AND ADANI HOUSING FINANCE PVT LTD intends to provide protection against sexual harassment of women at workplace and the prevention and redressal of complaints of sexual harassment and matters related to it.

SCOPE

ADANI CAPITAL PVT LTD AND ADANI HOUSING FINANCE PVT LTD aims to adopt zero tolerance attitudes against any kind of Sexual Harassment or discrimination caused by any employee during their tenure in ADANI CAPITAL PVT LTD AND ADANI HOUSING FINANCE PVT LTD towards any other person being an employee of ADANI CAPITAL PVT LTD AND ADANI HOUSING FINANCE PVT LTD, Client, Vendor and Contractor in Company premises or elsewhere in India or abroad.

APPLICABILITY

All employees of ADANI CAPITAL PVT LTD AND ADANI HOUSING FINANCE PVT LTD at all locations.

DEFINITION

1. Employee of ADANI CAPITAL PVT LTD AND ADANI HOUSING FINANCE PVT LTD – Includes person carrying out any work on behalf of ADANI CAPITAL PVT LTD AND ADANI HOUSING FINANCE PVT LTD and may have been hired as Permanent, Temporary, Contracted or on Retainership Basis, part-time basis etc either directly or indirectly or through vendor organization.
2. Sexual Harassment – Harassment of a Female/Male employee consisting of any unwelcome sexually determined behavior, whether directly, indirectly, by any male/female in charge of the management or a male/female co-employee either individually or in association with other persons to exploit the sexuality of co-employee to harass him/her in manner which prevents or impairs his/her full

utilization of full benefits, facilities or opportunities or any other behavior which is generally considered to be derogatory .

3. Aggrieved Women - In relation to workplace, a woman of any age whether employed or not, who alleges to have been subjected to any act of sexual harassment by the Respondent.
4. Respondent - Employees against whom the complaint has been filed.

POLICY GUIDELINES

Sexual Harassment shall include but not limit to:-

1. Physical Contact & Sexual advances
2. Demand or request for sexual favours;
3. Sexually- coloured remarks;
4. Showing pornography;
5. Any other unwelcome physical, verbal or non-verbal or written conduct of a sexual nature.

GRIEVANCE MECHANISM: PROCEDURE TO REGISTER COMPLAINTS

A complaint shall be submitted in writing to shacplcomplaint@adani.com or to any member of the Internal Committee mentioned herein within 3 months of occurrence of an act of Sexual Harassment. If the respondent is direct supervisor of the complainant, or person influencing the career growth of the complainant, the reporting structure will be changed till the time the enquiry is completed.

INTERNAL COMPLAINTS COMMITTEE

Each complaint of Sexual Harassment shall be dealt with utmost confidentiality and urgency by an Internal complaints committee consisting of:

- Presiding Officer: A woman employed at a senior level in the organization or workplace
- At least 2 members from amongst employees, committed to the cause of women and or having legal knowledge
- One external member, familiar with the issues relating to sexual harassment
- At least one half of the total members is women

The committee is responsible for:

- I. Receiving complaints of sexual harassment at the workplace
- II. Initiating and conducting inquiry as per the established procedure
- III. Submitting findings and recommendations of inquiries
- IV. Coordinating with the employer in implementing appropriate action
- V. Maintaining strict confidentiality throughout the process as per established guidelines
- VI. Submitting annual reports in the prescribed format

Current nominated members of the committees are given in Annexure A.

Within 3 working days, the Internal complaints committee shall commence Official Internal Enquiry by:

- I. By informing the said complaint to the respondent.
- II. By instructing to stop the alleged act of Sexual Harassment immediately
- III. By informing not to reach out to the complainant directly or indirectly
- IV. By asking an immediate explanation from him/her to the same

Within 5 working days from the receipt of original complaint, the designated person shall respond in writing to the complainant informing him/her about the initial steps taken by ADANI CAPITAL PVT LTD AND ADANI HOUSING FINANCE PVT LTD in order to stop the alleged act(s)

Within 15 days from receipt of the original complaint, the Internal committee shall record and accordingly communicate in writing to the complainant and the Respondent, its prima facie findings, upon giving the concerned parties a fair and due opportunity to represent themselves and upon conducting fact finding, truth verification and counselling sessions with persons involved in alleged act(s)

A complaint will be closed no later than one month from receipt of original complaint by recording the decisions of the internal committee, accordingly informing to the complainant and the Respondent of the same.

Employees are duty bound to assist in investigative steps, employees' wholehearted participation shall be mandatory in this regard. Whistle-blowers shall be protected from exposure, retaliation or hostility.

Within 2 working days from receipt of prima facie findings or the charges, if the complainant or the Respondent is dissatisfied with the decision of internal committee, she or he may appeal specifying the reasons in writing to Managing Director. Within 5 working days from the receipt, the appeal shall be finally disposed of by written communication to the said party. The decision of Managing Director shall be final and cannot be appealed.

REDRESSAL

- I. An amicable resolution of the complaint is possible only with the written consent of the complainant.
- II. Within 24 hours of closing the case file, the internal committee shall present the same to and inform its decision to the Managing Director.
- III. In case of decision establishing the offence of Sexual Harassment of the complainant, within 3 working days, the internal committee shall recommend Disciplinary action against the offender considering the nature and extent of injury caused to the complainant, prior complaints or repetition of offence etc and the impact of the offence on the company profile as a whole.
- IV. The position of the offender and the criticality of the position occupied by the offender shall not be any hindrance to the disciplinary action taken against the offender.
- V. The disciplinary action that shall be commensurate with the nature of the gravity of the offence, shall include but not limited to,
 - a. Warning - Written apology from offender,

- b. Bond of good behavior
 - c. Transfer
 - d. Debarring from supervisory duties
 - e. Denial of employee benefits like increments/promotion/salary correction etc.
 - f. Cancellation of specific work Assignment
 - g. Suspension
 - h. Dismissal
- VI. Annual report summarizing complaints and Redressal of Sexual harassment shall be prepared by designated person. The said report as well as all documents regarding Sexual Harassment complaints shall be in the custody of designated person and will be termed as 'Strictly Confidential'.

MALICIOUS ALLEGATIONS

Where the committee arrives at the conclusion that the allegation against the respondent is malicious or the aggrieved woman or any other person making the complaint has made the complaint knowing it to be false or the aggrieved woman or any other person making the complaint has produced any forged or misleading document, it may recommend to the employer to take action against the woman or the person making the complaint.

The action recommended should be similar to the ones proposed for the respondent in case of substantiated complaints.

While deciding malicious intent, the committee should consider that mere inability to substantiate a complaint need not mean malicious intent. Malicious intent must be clearly established through a separate inquiry.

CONFIDENTIALITY

The identity of the complainant, respondent, witnesses, statements and other evidence obtained in the course of inquiry process, recommendations of the committees, action taken by the employer is considered as confidential materials, and not published or made known to public or media.

Any person contravening the confidentiality clauses is subject to disciplinary action as prescribed in the act.

APPEAL

Any party not satisfied or further aggrieved by the implementation or non-implementation of recommendations made, may appeal to the appellate authority in accordance with the Act and rules, within 90 days of the recommendations being communicated.

Annexure A

Internal Complaints Committee at Head Office Adani Capital Pvt Ltd	
Presiding Officer	Gaurav Terdal (Temporary as it has to be a Sr. Female Employee)
Member	Piya Iyer
Member	Priyanka Prakash
Member	Suyog Pradhan
Member (External)	VKS Sharanya (Veena Prakash Singh)

Each location/unit of ADANI CAPITAL PVT LTD AND ADANI HOUSING FINANCE PVT LTD has a duly constituted Internal Complaints Committee (ICC), details of which can be obtained by any person by writing to any of the above mentioned ICC member.