

POLICY FOR PROHIBITION, PREVENTION, AND REDRESSAL OF SEXUAL HARASSMENT AT WORKPLACE

1. Introduction

Apollo Finvest (India) Ltd. ("Apollo" or "the Company") is committed to creating and maintaining a work environment where the dignity of employees and privacy is of utmost importance. It aims to provide a workplace where women employees are treated with respect, dignity, equality, and an environment that enables employees to work without fear of prejudice, gender bias, and sexual harassment. To achieve this, all employees should conduct themselves in a professional manner and refrain from committing any act of sexual harassment.

The Policy has been formulated in accordance with the provisions of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 ("the Act") and rules made thereunder. This Policy is gender-neutral and intends to promote a safe working environment for all where there is zero tolerance for any form of sexual harassment.

2. Applicability

This policy is applicable to all the Company's offices, premises and any other offices, by whatever name called, where there are more than 10 or more employees.

3. Definitions

"Aggrieved woman" means a woman of any age whether employed or not, who alleges to have been subjected to any act of sexual harassment by the respondent.

"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 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.

"Employer" means any person responsible for the management, supervision and control of the workplace. Management includes the person or board or committee responsible for formulation, implementation and administration of policies.

"Internal Complaints Committee ("ICC")" means a Committee constituted by the Company as per this Policy

"Presiding Officer" means the Presiding Officer of the Internal Committee who shall be a woman employed at a senior level at Workplace from amongst the employees.

"Respondent" means a person against whom the complaint has been filed.

"Sexual Harassment" includes any one or more of the following unwelcome acts or behaviour (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, 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:

- (i) implied or explicit promise of preferential treatment in employment; or
- (ii) implied or explicit threat of detrimental treatment in employment; or
- (iii) implied or explicit threat about present or future employment status; or
- (iv) interference with work or creating an intimidating or offensive or hostile work environment; or
- (v) humiliating treatment likely to affect health or safety.

“Workplace” means all offices, plants or other premises including safety parks where the business of the Company is conducted and includes the places hired for any special events / functions organized by the Company and any place visited by the employee arising out of or during the course of employment including transportation provided by the Employer for undertaking such journey.

Note: Any other term not defined herein shall have the same meaning as defined in the Act or any other applicable law.

4. Prevention of Sexual Harassment

The Company to take all the appropriate steps to prevent sexual harassment which shall include:

- display at any conspicuous place in the workplace, the penal consequences of sexual harassment;
- organize workshops and awareness programs at regular intervals for sensitizing the employees with the provisions of the Act
- provide assistance to the woman if she so chooses to file a complaint in relation to the offense under the Indian Penal Code (45 of 1860) or any other law for the time being in force
- dissemination of this Policy.
- Internal Complaints Committee (“ICC”)

Apollo has constituted Internal Complaints Committee. The Committee will comprise of the following members:

- I. Presiding Officer – who shall be a woman employed at a senior level from amongst the employees.
- II. Minimum two members – from employees preferably committed to the cause of women or who have had experience in social work or have legal knowledge.
- III. One external member – from non-governmental organizations or associations committed to the cause of women or a person familiar with the issues relating to sexual harassment.

Further, at least one-half of the total members so nominated shall be women.

All members shall hold office for a period of three years from the date of their nomination and any member may be removed prior to his / her term in accordance with the provisions of the Act.

5. Complaint

A Complainant may file a complaint, in writing, at diksha@apolloinvest.com or deliver by hand six copies of the complaint to any member of the ICC, if he or she believes to be subjected to sexual harassment. Such complaint shall be filed within a period of 3 months from the date of incident and in case of a series of incidents, within a period of 3 months from the date of last incident.

If a complaint is not in writing, all reasonable assistance shall be provided by the ICC members to the Complainant for making the complaint in writing.

If the Complainant is unable to make a complaint on account of physical incapacity, a complaint may be filed by –

- (i) legal heir; or
- (ii) relative or friend; or
- (iii) co-worker; or
- (iv) an officer of the National Commission for Women or State Women's Commission; or
- (v) any person who has knowledge of the incident, with the written consent of the aggrieved person.

If the Complainant is unable to make a complaint on account of mental incapacity, a complaint may be filed by –

- (i) legal heir; or
- (ii) relative or friend; or
- (iii) a special educator; or
- (iv) a qualified psychiatrist or psychologist; or
- (v) the guardian or authority under whose care he or she is receiving treatment or care;
- (vi) any person who has knowledge of the incident jointly with his or her relative or friend or a special educator or qualified psychiatrist or psychologist or guardian or authority under whose care he or she is receiving treatment or care.

If 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 his or her written consent.

If the aggrieved person is dead, a complaint may be filed by any person who has knowledge of the incident, with the written consent of his or her legal heir.

On receipt of the complaint, the ICC shall share a copy of the Complaint with the Respondent within 7 working days.

The Respondent shall file his or her reply, along with the list of documents and names and addresses of witnesses, within 10 working days from the date of receipt of documents.

6. Conciliation

Before initiating an inquiry and at the request of the Complainant, the ICC may take steps to settle the matter through conciliation. However, no monetary settlement shall be made as a basis of conciliation. Where a settlement is arrived at, the ICC shall record it and take the

action as per the settlement and no further inquiry shall be conducted. Further, the copies of such settlement shall be provided to the Complainant and Respondent.

If the Complainant informs the ICC that any term or condition of the settlement has not been complied with by the Respondent, the ICC shall proceed to conduct an inquiry or forward the same to the police.

7. Inquiry

Both the Complainant and Respondent shall be given an opportunity of being heard and a copy of the findings shall be made available to both the parties enabling them to make representation against the findings before the ICC.

In conducting the inquiry, all the members including the Presiding Officer shall be present. The parties are not allowed to bring any Legal practitioner during the Inquiry process.

The ICC shall have the right to terminate the inquiry proceedings or give an *ex-parte* decision, if the Complainant or Respondent fails, without sufficient cause, to present themselves for 3 consecutive hearings convened by the Presiding Officer. However, such termination or *ex-parte* order may not be passed without giving a notice, in writing, 15 days in advance to the party concerned.

During the pendency of an inquiry and on a written request by the Complainant, the ICC may provide such relief as it may deem appropriate and in line with other applicable statutory laws.

The inquiry shall be completed within a period of 90 days. On completion of an inquiry, the ICC shall provide a report of its findings to the Employer/Company within a period of 10 days from the date of the completion of the inquiry and such report be made available to the concerned parties.

The ICC on the basis of the inquiry shall suggest the Employer/ Company to take necessary action/ steps. The Employer/Company shall act upon the recommendation within 60 days of the receipt of the recommendation.

8. Malicious/ False Complaint

If the ICC arrives at a 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 the Committee may take necessary action against the Complainant

9. Confidentiality

The contents of the complaint, the identity, and addresses of the Complainant, Respondent, and witnesses, any information relating to conciliation and inquiry proceedings, recommendations of the ICC, and the action taken by the Employer / Company shall not be published, communicated, or made known to the public, press, and media in any manner.

However, disclosures as per applicable laws may be made by the Company and/or as required by any authority of law or under any legal or judicial proceedings. Any person, who contravenes this provision, shall be liable for a penalty as may be prescribed under the rules.

10. Protection

Apollo shall ensure that the parties to the complaint and their respective witnesses are not victimized and are protected against any form of retaliation. In case of any victimization, suitable disciplinary action shall be taken against the perpetrator.

11. Appeal

Any person aggrieved from the recommendations made may prefer an appeal to the Court or Tribunal. This appeal shall be preferred within a period of 90 days from the date of the recommendations.

12. Review and Amendments

This Policy may be reviewed by the Board of Directors as and when required. In the event of any conflict between the provisions of this Policy and the Act or rules, the Act or rules shall prevail over this Policy.

Any subsequent amendment/ modification in the Act or any other rules shall automatically apply to this Policy.