



**PNB HOUSING FINANCE LIMITED**

**POLICY ON  
PREVENTION OF SEXUAL HARASSMENT**

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### **Summary of Version History**

|                                           |                          |
|-------------------------------------------|--------------------------|
| <b>Policy approved by</b>                 | Board of Directors       |
| <b>Policy drafted by</b>                  | Human Resources          |
| <b>Last Date of<br/>Renewal of Policy</b> | March 04, 2024/ V6.0     |
| <b>Current Revision Date/No</b>           | September 05, 2025/ V7.0 |

## **POLICY ON PREVENTION OF SEXUAL HARASSMENT**

### **1.1. Background**

PNB Housing Finance Limited (PNBHFL) is committed in promoting a work environment that encourages harmony, productivity and individual growth and strives to ensure that no woman is subjected to sexual harassment at the workplace. The organization is committed in preventing, prohibiting and taking necessary corrective actions through appropriate redressal mechanisms against any form of sexual harassment at the workplace which is defined in this Policy.

This policy has been framed in accordance with the provisions of “The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013” and rules framed thereunder (hereinafter “the Act”). Accordingly, while the policy covers all the key aspects of the Act, for any further clarification reference shall always be made to the Act and the provisions of the Act shall prevail.

Sexual harassment at the workplace, if involving any aggrieved employee is a grave offence and is punishable.

### **1.2. Applicability**

This policy applies to all employees of PNBHFL including management trainees, apprentices, retainers, interns, temporary employees, any person deployed by subsidiary company, third party employee, visitors, vendors, suppliers or called by any other such name, but are subjected to sexual harassment at the workplace (defined hereinafter) of the Company.

### **1.3. Definitions**

- a) “Sexual Harassment” maybe one or a series of incidents that occur at a workplace or while working from home and involving unsolicited and unwelcome sexual advances, requests for sexual favours, or any other verbal or physical conduct of sexual nature.

Acts of Sexual Harassment against an aggrieved woman include (but are not limited to) unwelcome sexually determined acts or behaviour (whether directly or by implication) listed below:

- i. Unwelcome physical contact on any part of the body, or advances which affronts the dignity of the Complainant or Aggrieved Woman
  - ii. A demand or request for sexual favours
  - iii. Making sexually coloured remarks
  - iv. Showing pornography
  - v. Any other unwelcome, physical, verbal or non-verbal conduct of sexual nature
  - vi. Interference with her work or creating an intimidating or offensive or hostile work environment in relation to or connected with any act or behaviour of Sexual Harassment.
- b) “Workplace” shall mean and include all Company premises and places where interaction is arising out of or during the course of employment and shall include transportation provided by the company, offsites, office and team parties, get-together, internet (WhatsApp, Instagram, Facebook, LinkedIn or any other social media platform) any interaction outside the office which is primarily arising out of official relationship between the parties.
- c) “Internal Committee or IC” means the committee constituted by the organisation to address the complaints of sexual harassment.

- d) "Presiding officer" means the Presiding officer of the IC nominated by the company in accordance with the Act.
- e) "Aggrieved woman" shall mean any Women Personnel, who in relation to a workplace and may be a victim of Sexual Harassment.
- f) "Respondent" is a person against whom the aggrieved woman has made a complaint.

#### **1.4. Internal Committee for Sexual Harassment**

A Committee has been constituted to consider and address complaints of sexual harassment. The members of the committee will be appointed by Managing Director & CEO as recommended by the Chief People Officer of the Company. The sexual harassment policy derives its governance and action from the prescribed Act.

##### **1.4.1. The Internal Committee (IC) comprises of:**

- Presiding Officer: A woman employed at a senior level at the workplace amongst the employees and designated by the organisation to be a Presiding Officer.
- At least 2 members from amongst employees, preferably committed to the cause of women and or having legal knowledge.
- One external member, familiar with the issues related to sexual harassment.
- At least one half of the total members are women.

##### **1.4.2. The Internal Committee is responsible for:**

- Receiving complaints of sexual harassment at the workplace
- Initiating and conducting inquiry as per the established procedure
- Submitting findings and recommendations of inquiries
- Maintaining strict confidentiality throughout the process as per established guidelines
- Submitting annual reports in the prescribed format

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

#### **1.5. Procedure to Raise a Complaint**

- a) An employee who has been subjected to sexual harassment should report the incident immediately to any of the following –
  - i. Human Resource
  - ii. Chairperson of Internal Committee
  - iii. any member of the Internal Committee
  - iv. or write an email at POSH@pnbhousing.com
- b) The complaint must be lodged within 3 months from the date of incident/ last incident. The Internal Committee can extend the timeline by another 3 months for reasons recorded in writing, if satisfied that these reasons prevented in lodging of the complaint.
- c) If the aggrieved woman is unable to lodge the complaint in account of her incapacity, the following may do so on her behalf, with her written consent.
- d) Legal heir, relative or friend
- e) Co-worker/ Reporting manager
- f) Any person having the knowledge of the incident.
- g) Complaints received from any other source or anonyms complaints will not be entertained by the IC. Complaints received from any other source shall be taken up for investigation by

IC only and only written confirmation of the aggrieved female that she wants the matter to be taken up by the IC.

- h) If the aggrieved female does not want the matter to be taken up with IC post submission of a written complaint a written confirmation from her of the same must be taken.

## **1.6. Investigation**

### **1.6.1. Resolution procedure through conciliation:**

Once the complaint is received, before initiating the inquiry the IC may take steps to conciliate the complaint between the respondent and complainant (only if the complainant is the aggrieved woman). It is made clear to all parties that conciliation in itself doesn't necessarily mean acceptance of complaint by the respondent. It is a practical mechanism through which issues are resolved or misunderstandings cleared. In case a settlement has been arrived at between the aggrieved party and the respondent, then IC shall record the settlement so arrived in writing along with the recommendations of the Inquiry committee and forward the same to the Managing Director & CEO along with Chief People Officer for taking appropriate action.

The Inquiry committee shall provide a copy of the terms of settlement as recorded to the aggrieved party and respondent. Consequent thereto, the Inquiry committee shall close the proceedings and shall not carry out any inquiry on the said complaint.

### **1.6.2. Resolution procedure through formal inquiry**

Conducting Inquiry

The IC initiates inquiry in the following cases:

- No conciliation is requested by aggrieved woman.
- Conciliation has not resulted in any settlement.
- Complainant informs the committee that any terms and conditions of the settlement arrived through conciliation, has not been complied with by respondent.
- The Committee proceeds to make an inquiry into the complaint after the receipt of the original complaint/closure of conciliation/repeat complaint.

### **1.6.3. Manner of inquiry into complaint:**

- The IC would carry out an inquiry into the complaint received. For the purpose of this inquiry, IC shall nominate three (3) or five (5) persons from amongst its members as the inquiry team.
- Complainant should submit the complaint along with supporting documents and the names of the witnesses.
- The IC within stipulated timelines after receiving the complaint shall forward one copy thereof to the Respondent for obtaining a response.
- Respondent replies with all supporting documents within stipulated timelines after receiving the copy of the complaint.
- The IC shall hear both the Complainant and the Respondent on date(s) intimated to them in advance and the principles of natural justice will be followed accordingly.
- The IC has powers to:
  - Summon and enforce the attendance of any person and examine him on oath.
  - Require the discovery and production of documents.
- The IC shall have the right to terminate the inquiry proceedings or to give an ex-parte decision on the complaint, if the Complainant or Respondent fails, without sufficient cause, to present themselves, for three consecutive hearings convened by the Chairperson or

Presiding Officer. 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 Complainant and the Respondent 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. However, they may be accompanied by a colleague for psychological or emotional support. Such colleague will not be permitted to speak at or otherwise interfere with the proceedings of the IC.
- All efforts should be taken to expedite the process and complete the inquiry as early as possible. The inquiry should be completed within a maximum of 90 days.

### **1.7. Interim actions that can be taken while inquiry is in progress:**

During pendency of the inquiry, on a written request made by the complainant, the committee may recommend that PNBHFL –

- Transfer the complainant or the respondent to any other workplace.
- Grant leave to the aggrieved woman of maximum 3 months, in addition to the leave she would be otherwise entitled.
- Prevent the respondent from assessing complainant's work performance, day to day reporting and any activity arising out of work relationship.
- Grant such other relief as may be appropriate. Once the recommendations of interim relief are implemented, the management will inform the committee regarding the same.

### **1.8. Inquiry Report and Recommendations:**

Summary of the findings will be made available to both the parties (complainant and respondent).

Post sharing the findings, the Inquiry committee shall submit the final report along with its recommendations to the Company within a period of 10 days from the date of completion of the inquiry to CPO along with MD & CEO.

If the conclusion is that:

- a) The allegation has not been proved; the IC shall recommend to the Company that no action is required to be taken in the matter.
- b) If the allegation against the respondent has been proved, the IC shall recommend to the Company to take action for sexual harassment as a misconduct in accordance with the applicable policy.

The Company has to act upon the recommendation within 60 days of receipt of the same.

### **1.9. False or Malicious Complaint**

In case the IC arrives at a conclusion that the allegation against the Respondent is malicious, or the Complainant has made the complaint knowing it to be false or has produced any forged or misleading document, and the malicious intent of the complainant is proved, then based on the findings of the inquiry committee may recommend to the Company to take appropriate action against the complainant in accordance with the applicable policy.

A similar recommendation for taking action would be recommended against any witness whom the IC concludes has given false evidence or produced forged or misleading documents.

### **1.10. Appeal**

Any person aggrieved from the recommendations made by the IC or non-implementation of such recommendations may prefer an appeal to the court or tribunal in accordance with the Act and rules.

The appeal shall be preferred within 90 days of the recommendations being communicated.

### **1.11. Prohibition of Retaliation:**

Retaliation of any kind against anyone who is involved in the investigation of or in making an allegation of sexual harassment is prohibited and will result in disciplinary action against the retaliator, including termination of employment.

### **1.12. 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.

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### **1.13. Annual Reporting**

The IC shall prepare an Annual Report and submit the details to MD & CEO or to the designated authority as in when required.

### **1.14. Exceptions and Signing Authority**

The above sexual harassment policy is subject to exceptions that can be approved by the Board of Directors of PNBHFL or the NRC.

Annexure: List of Internal Committee Members

**CSO & North Zone**

| Name                      | Role            | Contact No | Location    | Tenure                         | Email id                                                                               |
|---------------------------|-----------------|------------|-------------|--------------------------------|----------------------------------------------------------------------------------------|
| Ms. Veena Kamath          | Chairperson     | 9845028520 | CSO_Gurgaon | 20/02/2024<br>to<br>19/02/2027 | <a href="mailto:veena.kamath@pnbhousing.com">veena.kamath@pnbhousing.com</a>           |
| Ms. Apoorva Bhateja       | Internal Member | 7290061317 | CSO_Gurgaon | 31/03/2024<br>to<br>30/03/2027 | <a href="mailto:apoorva.bhateja@pnbhousing.com">apoorva.bhateja@pnbhousing.com</a>     |
| Ms. Ruchika Chawla        | Internal Member | 9971344800 | CSO_Delhi   | 10/02/2025<br>to<br>08/02/2028 | <a href="mailto:ruchika.chawla@pnbhousing.com">ruchika.chawla@pnbhousing.com</a>       |
| Ms. Rachna Joshi          | Internal Member | 9910998048 | CSO_Gurgaon | 21/08/2024<br>to<br>20/08/2027 | <a href="mailto:rachna.joshi@pnbhousing.com">rachna.joshi@pnbhousing.com</a>           |
| Mr Girijesh Mani Tripathy | Internal Member | 8368490603 | North       | 05/11/2025<br>to<br>04/11/2028 | <a href="mailto:girijesh.tripathy@pnbhousing.com">girijesh.tripathy@pnbhousing.com</a> |
| Mr Vikas Bhutani          | Internal Member | 7042594448 | CSO_Gurgaon | 03/10/2023<br>to<br>02/10/2026 | <a href="mailto:vikas.bhutani@pnbhousing.com">vikas.bhutani@pnbhousing.com</a>         |
| Dr. Anagha Sarpotdar      | External Member | 7506907837 | NA          | 01/10/2023<br>to<br>30/09/2026 | <a href="mailto:anagha75.sarpotdar@gmail.com">anagha75.sarpotdar@gmail.com</a>         |

**West Zone**

| Name                      | Role            | Contact No | Location       | Tenure                      | Email id                                                                       |
|---------------------------|-----------------|------------|----------------|-----------------------------|--------------------------------------------------------------------------------|
| Ms. Veena Kamath          | Chairperson     | 9845028520 | CSO_Gurgaon    | 20/02/2024 to<br>19/02/2027 | <a href="mailto:veena.kamath@pnbhousing.com">veena.kamath@pnbhousing.com</a>   |
| Ms. Rachna Joshi          | Internal Member | 9910998048 | CSO_Gurgaon    | 21/08/2024 to<br>20/08/2027 | <a href="mailto:rachna.joshi@pnbhousing.com">rachna.joshi@pnbhousing.com</a>   |
| Ms. Nikita Nahar          | Internal Member | 9920287484 | BO_Mumbai-Fort | 02/03/2024 to<br>01/03/2027 | <a href="mailto:nikita.nahar@pnbhousing.com">nikita.nahar@pnbhousing.com</a>   |
| Mr. Kaushal Vyas          | Internal Member | 9987956168 | ZO_Mumbai      | 16/05/2025 to<br>14/05/2028 | <a href="mailto:kaushal.vyas@pnbhousing.com">kaushal.vyas@pnbhousing.com</a>   |
| Mr. Deepak Bhagwan Kamble | Internal Member | 9892994745 | ZO_Mumbai      | 03/10/2023 to<br>02/10/2026 | <a href="mailto:Deepak.kamble@pnbhousing.com">Deepak.kamble@pnbhousing.com</a> |
| Dr Anagha Sarpotdar       | External Member | 7506907837 | NGO            | 01/10/2023 to<br>30/09/2026 | <a href="mailto:anagha75.sarpotdar@gmail.com">anagha75.sarpotdar@gmail.com</a> |

**South Zone**

| Name                | Role               | Contact No | Location      | Tenure                         | Email id                                                                         |
|---------------------|--------------------|------------|---------------|--------------------------------|----------------------------------------------------------------------------------|
| Ms. Veena Kamath    | Chairperson        | 9845028520 | CSO_Gurgaon   | 20/02/2024<br>to<br>19/02/2027 | <a href="mailto:veena.kamath@pnbhousing.com">veena.kamath@pnbhousing.com</a>     |
| Ms. Rekha R Mallya  | Internal<br>Member | 9845335084 | CSO_Gurgaon   | 03/10/2023<br>to<br>02/10/2026 | <a href="mailto:rekha.mallya@pnbhousing.com">rekha.mallya@pnbhousing.com</a>     |
| Ms. Rachna Joshi    | Internal<br>Member | 9910998048 | CSO_Gurgaon   | 21/08/2024<br>to<br>20/08/2027 | <a href="mailto:rachna.joshi@pnbhousing.com">rachna.joshi@pnbhousing.com</a>     |
| Ms. Prachi Dikshit  | Internal<br>Member | 7259586186 | ZO_Bangalore  | 16/05/2025<br>to<br>14/05/2028 | <a href="mailto:prachi.dikshit@pnbhousing.com">prachi.dikshit@pnbhousing.com</a> |
| Mr. Balaji TK       | Internal<br>Member | 9629415151 | RH_Coimbatore | 16/05/2025<br>to<br>14/05/2028 | <a href="mailto:balaji.tk@pnbhousing.com">balaji.tk@pnbhousing.com</a>           |
| Mr. Madhavan R      | Internal<br>Member | 9611542886 | RH_Cochin     | 16/05/2025<br>to<br>14/05/2028 | <a href="mailto:madhavan.r1@pnbhousing.com">madhavan.r1@pnbhousing.com</a>       |
| Dr Anagha Sarpotdar | External<br>Member | 7506907837 | NGO           | 01/10/2023<br>to<br>30/09/2026 | <a href="mailto:anagha75.sarpotdar@gmail.com">anagha75.sarpotdar@gmail.com</a>   |