

EMBASSY DEVELOPMENTS LIMITED

(formerly Equinox India Developments Limited, and earlier Indiabulls Real Estate Limited)

(CIN: L45101HR2006PLC095409)

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POLICY ON PREVENTION OF SEXUAL HARASSMENT AT WORKPLACE

(Policy last reviewed and amended on August 14, 2024)

1. COMPANY POLICY:

Embassy Developments Limited (hereinafter referred to as “EMBDL” or “the Company”) as an employer is committed to creating a healthy and safe work environment that enables employees to work free from unwelcome, offensive and discriminatory behavior. The aim is to enable them to deliver their best at work without fear of prejudice, gender bias and sexual harassment. The Company recognizes consequences of sexual harassment, and that sexual harassment can subject individuals to fear, stress and anxiety. It acknowledges the strains that such harassment may have on the work and family life of an individual.

Sexual harassment at the workplace is a form of discrimination and is prohibited by law. Protection against sexual harassment and right to work with dignity are universally recognized human rights by international conventions and instruments. Therefore, in order to deal with sexual harassment at workplace the Company has set out a policy for Prevention and Redressal of Sexual Harassment incidents.

The Policy aims to prevent, prohibit, and offer redressal for any incident of sexual harassment and to enforce strong disciplinary action in face of any such occurrence. It defines sexual harassment and provides a framework to deal with complaints of sexual harassment at the workplace or related to the workplace.

Any form of sexual harassment whether overt or covert is unacceptable and regarded as misconduct as per this Policy. It explicitly prohibits sexual harassment at workplace or off site, either during or in connection with activities related to work.

The Company is committed to ensure that sexual harassment instances and incidents can be reported without fear of reprisal or retaliation. The Company will investigate instances / and or complaints of sexual harassment promptly and discreetly. The Company will initiate disciplinary action as per the details provided in this Policy.

It is the responsibility of all those connected with the Company, in any manner whatsoever, to comply with this Policy.

2. OBJECTIVES:

- a) To provide work environment free from fear, reprisal, coercion, discrimination and harassment of sexual nature
- b) To have zero tolerance to any sexual harassment at workplace through Prevention, Resolution and Deterrence of acts of sexual harassment
- c) To enable all those working, associated and visiting the Company to raise their concerns and make complaints without any fear

- d) To define sexual harassment and provide a clearly stated codified redressal mechanism for any sexual harassment occurring at workplace
- e) To provide a procedure for resolution, settlement or prosecution in case of complaints of sexual harassment
- f) To conduct fair investigation and reach a reasonable decision in a timely manner.

3. SCOPE:

The Policy applies to all those employed and associated with the Company. They can be regular, temporary, ad hoc or daily wage basis employees. They include contract workers, consultants, retainers, probationers, trainees, and apprentices or called by any other such name and engaged by the Company. They could be appointed either directly or through an agent including a contractor, with or without knowledge of the Company. The terms of employment could be expressed or implied. This Policy also applies to all vendors, contractors, customers, agents and suppliers who do business with the Company and/ or visit the employees of the Company.

This Policy will be incorporated in the service conditions of all employees explicitly or by inferences and will come into effect immediately. All parties connected with the Company are mandated to follow this Policy and to work collaboratively to prevent sexual harassment.

4. DEFINITIONS:

“Aggrieved Person” means a person in relation to workplace whether employed or not, who alleges to have been subjected to any act of sexual harassment by the Respondent;

“Company” means Embassy Developments Limited;

“employee” means a person employed at a workplace for any work on regular, temporary, *ad hoc* 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.

This broad definition of ‘employee’ is only for the purpose of this policy and the law on prevention of sexual harassment at workplace and cannot be used to claim rights of an employee under any other law of the land;

“Internal Complaints Committee” means a committee constituted by the Company as per this Policy.

“Respondent” means a person against whom the aggrieved person has made a complaint.

“Sexual Harassment” includes any one or more of the following unwelcome acts or behavior (whether directly or by implication) such as:

- i. Physical contact and advances; or
- ii. A demand or request for sexual favors; or
- iii. Making Sexually colored remarks; or
- iv. Showing pornography or other offensive or derogatory pictures, cartoons, representations, graphics, pamphlets or sayings; or
- v. Any other unwelcome physical, verbal or non - verbal conduct of sexual nature;

Following circumstances amongst other circumstances mentioned above may constitute sexual harassment if it occurs or is present in relation or connected with any act or behavior of sexual harassment:

- i. implied or explicit promise of preferential treatment in their employment;
- ii. implied or explicit threat of detrimental treatment in their employment;
- iii. implied or explicit threat about their present or future employment status;
- iv. interfering with their work or creating an intimidating or offensive or hostile work environment; humiliation treatment likely to affect their health or safety.
- v. humiliating treatment likely to affect the health and safety of the aggrieved person.

“Workplace” includes any department, organization, undertaking, establishment, enterprise, institution, office or branch unit. It also includes 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.

5. INTERNAL COMPLAINTS COMMITTEE (ICC):

Internal Complaints Committee shall be constituted with the following members as may be nominated by the Company from time to time:

- a) A woman employee employed at a senior level amongst the employees shall act as Presiding officer of the committee.
- b) Not less than 2 members from amongst employees preferably committed to the cause of women OR who have had experience in social work OR have legal knowledge.
- c) One member shall be from amongst Non-governmental organizations OR associations committed to the cause of women OR a person familiar with the issues relating to sexual harassment.

At least half the total members of the Committee shall be women. The Presiding Officer and every other member shall hold office for a period not exceeding three years.

The names of the members of the ICC shall be declared by the HR Department / MD Office of the Company. Any change(s) in the constitution of the ICC shall be communicated by the Company.

The details about the current members of the Internal Complaints Committee are enclosed as **Annexure-A**.

The ICC shall carry out an inquiry into the Complaint(s) of sexual harassment received from the employees in a just and fair manner and shall maintain confidentiality about the matter and the people involved therein.

6. COMPLAINT OF SEXUAL HARASSMENT

Any aggrieved person may make, in writing, a complaint of sexual harassment at workplace to the Internal Complaints Committee giving details of the sexual harassment meted out to her/him 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.

The Presiding Officer or any Member of the ICC can render reasonable assistance to the person for making complaint in writing, in case they are unable to do so.

Where the aggrieved person is unable to make a complaint on account of their physical incapacity, a complaint may be filed by:-

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

Where the aggrieved person is unable to make a complaint on account of their mental incapacity, a complaint may be filed by:-

- i. a relative or friend; or
- ii. a special educator' or
- iii. a qualified psychiatrist or psychologist; or
- iv. the guardian or authority under whose care they are receiving treatment or care; or
- v. any person who has knowledge of the incident jointly with any of the above.

Where the aggrieved person 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 their written consent.

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

The ICC on receipt of such written complaint may, if required, ask the aggrieved person to furnish additional information about the alleged harassment.

7. MANNER OF INQUIRY INTO COMPLAINT

Six copies of the complaint along with supporting documents and names and address of witness shall be sent to the ICC along with an email communication at icc@embassyindia.com.

On receipt of such complaint, duly admissible and complete in all respects, the ICC shall provide a copy along with supporting documents of such complaint to the Respondent within 7 working days.

The Respondent shall file reply within 10 working days of receipt of the complaint along with list of documents, names and addresses of witnesses

The ICC shall conduct a detailed inquiry into the matter of the complaint. The ICC shall have the right to call the person against whom the complaint is made or any other witnesses as and when necessary. The ICC is also empowered to direct discovery and/or production of any document, if any.

The ICC shall have the right to terminate the inquiry or give ex-parte decision on the complaint, if the Respondent or complainant remains absent for 3 consecutive hearings, without sufficient cause.

The ICC must complete its inquiry within the prescribed timeline i.e. 90 days from receipt of complaint.

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

For conducting the enquiry the quorum of the ICC shall be of 3 members including the presiding officer and the external member.

8. CONCILIATION

The ICC may, if it deems fit, before initiating an inquiry, attempt to settle the matter through conciliation. However, the ICC shall ensure that no monetary settlement will be made as a basis of conciliation.

Where a settlement has been arrived through conciliation process, the settlement terms shall be signed by both the parties.

Where, a settlement is arrived as mentioned hereinabove, no further inquiry shall be conducted by the ICC.

However, if it is reported to ICC that settlement has been breached then ICC shall proceed to conduct inquiry.

9. INQUIRY REPORT

The ICC shall, on completion of the inquiry, provide a report of its findings within 10 days from the date of completion of the enquiry and such report shall be made available to the concerned parties.

If the allegation against the respondent has not been proved, the ICC may recommend that no action needs to be taken in the matter.

If the ICC arrives at the conclusion that the allegation against the respondent has been proved, it shall recommend to:

- i. Take action for sexual harassment as a misconduct.
- ii. To direct respondent to tender written apology to the complainant, issue warning, withholding of promotions / increments of the Respondent, terminating the Respondent.
- iii. To deduct from salary / wages of the respondent or issue direction for payment; such sum as it may consider appropriate to be paid to the aggrieved person or to their legal heirs, as it may determine.
- iv. Any other punishment or action as may be deemed fit in the case in accordance with Law.

Such action will be taken by the employer within 60 days of the receipt of report.

10. DETERMINATION OF COMPENSATION

For the purpose of determining the sums to be paid to the aggrieved person, the ICC shall have regard to various factors including but not limited to the following:

- i. The mental trauma, pain, suffering and emotional distress caused
- ii. The loss in the career opportunity due to the incident of sexual harassment
- iii. The Medical expenses incurred by the victim for the physical, psychiatric or other relevant treatment

- iv. The income and financial status of the respondent.
- v. The feasibility of such payment in lump sum or in installments.

11. CONFIDENTIALITY

All information received in cases of Sexual Harassment including the name of the parties and / or witnesses, contents of the complaint, proceedings, outcome of the inquiry, etc shall be kept confidential. Any person (including witnesses) who breaches confidentiality shall be subject to strict disciplinary action and / or penalties prescribed in the matter.

12. COMPLAINTS MADE WITH A MALICIOUS INTENT / FALSE ACCUSATIONS

This policy has been evolved as a tool to ensure that in the interest of justice and fair play, our employees have a forum to approach in the event of instances of sexual harassment.

It should not be used for maligning the concerned individual/tarnishing his/her image in the company and to settle personal/professional scores, or intentionally falsely implicate an individual for any reasons whatsoever.

If the ICC comes to a conclusion that the allegation was made with malicious intent or the aggrieved person or any other person making the complaint on behalf of the aggrieved person produced false and/or forged and/or misleading documents to prove his/her case, the ICC may recommend action to be taken against the person who has made the said malicious / false complaint.

A similar recommendation for taking action would be recommended against any witness whom the ICC concludes, that he/she has given false evidence and/or produced forged and/or misleading documents and/or was acting in concert with complainant who had filed false or malicious complaint.

13. MISCELLANEOUS

All the employees shall have access to this Policy at any given point of time and clarification related to this Policy shall be addressed by the HR team.

A brief shall be given to all existing employees regarding the features of this Policy immediately on formulation of the Policy and to new employees in the Company during their initial Induction.

The Company shall make its best efforts to ensure that all employees are provided with the safe working environment at the workplace.

The Company shall display the notice showing the names and contact details of the Internal Complaints Committee members at its every establishment at a conspicuous place.

Company may make any alteration or amendment or rescind any of the clauses of this Policy as and when it finds it necessary to do so as long as it complies with the applicable laws in force. Any such alterations or amendment or rescinding will be intimated to the employees.

ANNEXURE - A

EMBASSY DEVELOPMENTS LIMITED

Composition of Internal Complaints Committee w.e.f. August 10, 2026

Name of the Member	Position	Email ID	Contact Number
Ms. Gowri T R	Presiding Officer	gowri.t@embassyindia.com	8494926834
Mr. Jacob P Abraham	Member	jacob.a@embassyindia.com	8951476194
Ms. Reeza Sebastian Karimpanal	Member	reeza.s@embassyindia.com	9164751874
Mr. Rajesh Kaimal	Member	rajesh.k@embassyindia.com	9071380228
Ms. Sonu Arora	External Member	Sonu.276@gmail.com	9845079320