



Nestavia Home Finance Private Limited



Prevention of Sexual Harassment Policy

Name of the Policy: PREVENTION OF SEXUAL HARRASSMENT (POSH) POLICY

Policy Number: POSH-04/2026

PREAMBLE

Nestavia Home Finance Private Limited (hereinafter referred to as "Nestavia" or "the Company") recognizes that the success of the organization is built on a foundation of trust, integrity, and ethical behaviour.

The Company recognizes its responsibility to promote good and fair practices by setting minimum standards in dealing with employees and thus has implemented this POSH policy to establish clear guidelines and processes to deal with any complaints of sexual harassment.

This Policy is framed in compliance with the **Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013** (POSH Act) and applicable local and national laws.

Prepared and Proposed By	Head-HR
Reviewed and Recommended By	Managing Director & CEO
Approved By	Board of Directors
Date of Approval	30-Apr-2026

RESPONSIBILITY ASSIGNMENT MATRIX

Responsibility for Implementation	Human Resources Department
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VERSION CONTROL

Version No.	Date of Approval by Board of Directors	Key Highlights/Changes
1.0	24-Nov-2024	Roll-out of policy
2.0	23-Apr-2025	Updated upon Annual review
3.0	23-Jul-2025	Amendment to POSH Committee
4.0	30-Apr-2026	Reviewed upon Annual Review

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1. Objectives

The objectives of this POSH Policy are to:

- Prevent and prohibit sexual harassment in the workplace.
 - Create a work environment free from sexual harassment where all employees, regardless of gender, feel safe and respected.
 - Provide an accessible, transparent, and effective mechanism for addressing complaints of sexual harassment.
 - Ensure that complaints of sexual harassment are addressed swiftly, impartially, and confidentially, without any form of retaliation.
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2. Scope and applicability

This POSH policy applies to:

- All employees working at Nestavia Home Finance Private Limited, including permanent, contractual, temporary, interns, trainee or apprentice or called by any other such name as enumerated in clause (f) of Section 2 of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (hereinafter referred to as POSH Act).
 - Any individual visiting the premises of the Company, including customers, business partners, vendors, contractors etc.
 - The policy is applicable **within the workplace**, as well as during work-related events outside the workplace (e.g., business trips, off-site meetings, social gatherings hosted by the Company).
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3. Definition of Sexual Harassment

Sexual harassment includes, but is not limited to, the following:

1. **Physical Contact and Advances:**

Physical acts of a sexual nature, such as inappropriate behaviour, or any other form of sexual assault.

2. **Demand or Request for Sexual Favours:**

Any unwelcome request or demand for sexual favours in exchange for job benefits or otherwise.

3. **Verbal Harassment:**

Includes comments or jokes of a sexual nature, offensive remarks, sexually suggestive or vulgar language, and unwelcome sexual advances or invitations.

4. **Non-verbal Harassment:**

Displaying sexually explicit or suggestive visual materials, gestures, or unwelcome staring.

5. **Hostile Work Environment:**

Creating an intimidating, offensive, or hostile work environment that is based on sexual conduct, which unreasonably interferes with an employee's ability to perform their job.

6. **Any other conduct of a sexual nature** that creates a hostile, intimidating, or offensive work environment.

The above forms of sexual harassment can be directed at any individual, irrespective of their gender, and can involve same-gender harassment as well.

4. Responsibilities of the Company

The Company has the following responsibilities under the POSH Act:

- To prevent and prohibit sexual harassment at the workplace by implementing and enforcing this policy.
 - To organize regular awareness programs and workshops on sexual harassment for all employees.
 - To establish an Internal Complaints Committee (ICC) at Head Office and at Regional Offices to handle complaints of sexual harassment and ensure impartial, confidential, and timely investigation.
 - To provide necessary support to the victims of sexual harassment and ensure there is no retaliation against complainants.
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5. Responsibilities of the Employees

Every employee has the responsibility to:

1. Treat all colleagues with respect and dignity and not engage in any act of sexual harassment.
 2. Report any instances or incidents of sexual harassment to the Internal Complaints Committee (ICC).
 3. Cooperate with the ICC during investigations and maintain confidentiality.
 4. Not engage in retaliation or victimization of any individual who makes a complaint under this policy.
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6. Procedure for filing a complaint

1. **Complaints should be filed within a period of three months** from the date of occurrence of the incident and in case of a series of incidents, within a period of three months from the date of last incident.
 2. **Complaint to ICC:** Any employee who feels they have been subjected to sexual harassment should promptly file a written complaint with the **Internal Complaints Committee (ICC)**. The complaint can be submitted to the designated email address or in person. The complaint should include:
 - The details of the incident(s).
 - The names of individuals involved.
 - Any supporting evidence or witnesses (if available).
 3. **Anonymous Complaints:** Anonymous complaints will be reviewed, but they may be difficult to investigate unless there is sufficient information to proceed.
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7. Internal Complaints Committee (ICC)

1. **Composition of ICC:**

The ICC shall be constituted as per the POSH Act, consisting of the following members:

- **Presiding Officer:** A senior female employee of the Company.
 - **Two members:** Employees of the Company from different departments.
 - **HR Representative:** One member from HR department.
 - **External member:** A person from a non-governmental organization or an association committed to the cause of women.
2. The ICC will have the following responsibilities:
 - To receive and investigate complaints of sexual harassment.
 - To offer mediation and counselling where appropriate.
 - To recommend appropriate actions, including disciplinary measures, against the accused.
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8. Procedure for enquiring into the complaint

1. **Confidentiality:**

The ICC will ensure that the investigation process is confidential, and the identities of the complainant and the respondent will be protected.

2. **Inquiry Process:**

- Upon receiving the complaint, the ICC will acknowledge it within **seven working days**.
- An investigation will be conducted as per the principles of natural justice and in a confidential manner, where both the complainant and respondent will be given an opportunity to present their side with full cooperation from HR department in facilitating the same.
- The ICC will aim to resolve the matter within **90 days** from the date of the complaint.

3. Mediation:

In cases where both parties agree, the ICC may attempt to resolve the issue through **mediation**. However, this will not apply in cases of severe harassment or assault.

9. Rights of the complainant and the respondent

1. Rights of the Complainant:

- The complainant has the right to approach the ICC without fear of retaliation.
- The complainant can request temporary relief (e.g., change in work location or shift) during the investigation.

2. Rights of the Respondent:

- The respondent has the right to a fair hearing.
 - The respondent is entitled to be informed of the complaint and participate in the investigation process.
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10. Confidentiality

The Company is committed to maintaining the confidentiality of all complaints, and the details of any investigation or findings will not be disclosed except as required by law or with the consent of the complainant or respondent.

11. Action against false or malicious complaints

Any individual found to have filed a **false or malicious complaint** will face appropriate disciplinary action as stipulated under Section 14 of the POSH Act, as such conduct undermines the trust and integrity of the Company's processes.

12. Disciplinary action

In case the complaint is upheld, the following actions may be taken:

- **Warning or reprimand.**
 - **Suspension** from duties.
 - **Termination** of employment.
 - **Other disciplinary actions** as per the severity of the harassment.
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13. Appeal by the aggrieved person

Any person aggrieved from the recommendations made by the ICC or non- implementation of such recommendations, may prefer an appeal to the court or tribunal in accordance with the provisions of the service rules applicable to the said person or where no such service rules exist then, without prejudice to provisions contained in any other law for the time being in force, the person aggrieved may prefer an appeal within 90 days. The appeal will lie before the Appellate Authority notified under clause (a) of Section 2 of the Industrial Employment (Standing Orders) Act, 1946.

14. Prevention, awareness and training programs

- The Company will conduct regular **training sessions** on the Prevention of Sexual Harassment to raise awareness among employees regarding their rights, obligations, and the complaint process.
 - The Company will organize **workshops and seminars** to sensitize employees about sexual harassment and its impact on individuals and the work environment.
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15. Policy review and amendments

This policy will be reviewed periodically by the HR department to ensure compliance with the law, reflect changes in business or regulatory requirements, and enhance its effectiveness. Any amendments will be communicated to employees.

16. Contact details

For any queries or complaints, employees may contact the following:

- **Presiding Officer, ICC:**

Ms. Lakshmi Priya K, Vice President & Head – Finance is designated as Presiding Officer

Email: ICC@nestavihomefin.com email ID will be provided to all the employees

Phone: +914446065151 number will be provided to all the employees

- **HR Department:**

Email: HR@nestaviahomefin.com email id will be provided to all the employees
Phone: +914446065151 number will be provided to all the employees

This POSH Policy aims to create an atmosphere where everyone at **Nestavia Home Finance Private Limited** feels respected and valued. The Company expects all employees to abide by this policy and contribute to maintaining a safe and positive work environment.
