| SAMUNNATI FINANCE PRIVATE LIMITED | |
|---|---|
| **POLICY** | Policy on Prevention of Sexual Harassment at Workplace |
| **Reviewing Authority** | Nomination and Remuneration Committee |
| **Approving Authority** | Board of Directors |
| **Original Issue Date** | December 20, 2024 |
| **Version No.** | 1 |
| **Date of approval by Policy Approval Committee** | December 20, 2024 |
| **Date of last review** | May 19, 2026 |
| **Effective Date** | December 20, 2024 |
| **Review Cycle** | Annually as recommended by the Board of Directors |

**Purpose:**

The purpose of the Policy on Prevention of Sexual Harassment at Workplace ("Policy") is to lay down the guidelines for preventing Sexual Harassment at Workplace and also to provide guidelines for resolution / redressal of complaints on Sexual Harassment in line with **"The Sexual Harassment of Women at Workplace (Prevention, Prohibition & Redressal) Act, 2013" ("the Act").**

**Scope:**

The Policy is applicable to all Employees, Interns, Trainees, Contractors, Consultants, temporary/ part-time personnel engaged with all the group companies of Samunnati Finance Private Limited (the Company or Samunnati). This Policy is deemed to be included and incorporated in the service condition of each employee and applicable from the time they commence employment with the company. This Policy shall be applicable across all Workplace(s) of the Company. Workplace includes –

- Within or outside office premises, any work location (including Field Visits), where Company's business is conducted or any place visited by the stakeholders as stated above arising out of or during the course of employment including transportation provided by Samunnati for undertaking such journey/ visit,
- Any social/ business related gathering such as Conferences, Training Sessions, etc.,
- All company-related activities performed at any other site away from the Company's premises.

Where an event of Sexual Harassment occurs between third parties on Samunnati's Workplace, Samunnati will take measures in accordance with the Policy for resolution of the complaint and will take reasonable steps to assist the affected party.

**Policy: It is Samunnati's policy to create and promote a healthy working environment that enables employees to work peacefully without any fear of harassment. Consistent with its guiding principles and core values, Samunnati fosters an environment that promotes mutual respect and dignity of all its employees and stakeholders. Samunnati considers any act of harassment as a serious offence and punishable in accordance with its policies and as per Indian Law, as applicable. Samunnati will not tolerate any form of sexual harassment and is committed to take all necessary steps to ensure that its stakeholders are not subjected to any form of harassment.**

***Samunnati's policy abides by the Act and Vishaka Guidelines.***

**Samunnati's policy has been formed to prohibit, prevent or deter the commission of acts of sexual harassment at workplace and to provide the procedure for the redressal of complaints pertaining to sexual harassment.**

**Responsibilities regarding sexual harassment:**

- All employees / representatives of the Company have a personal responsibility to ensure that their behaviour is not contrary to this Policy. All employees are encouraged to reinforce the maintenance of a work environment free from sexual harassment and refrain from committing any act which amounts to sexual harassment at workplace.
- All functional heads/ line managers are responsible to ensure that there is no hostile work environment in the workplace and take prompt action on any complaint/ grievance raised by notifying it immediately to the committee concerned as per the policy.
- All representatives of Human Resources & Training function to ensure that all employees are updated on the Policy and trained, if applicable and also to communicate, explain and share the Policy with new joinees during their onboarding process as part of Induction.

**Internal Committee (IC):**

In accordance with the Act, Samunnati has constituted an Internal Committee (IC) for managing the complaints received under this Policy. The Committee is responsible for –

- Ascertaining the facts of complaint to determine if it is a case of Sexual Harassment
- Conduct enquiry, summon witnesses, evaluate documents/ proofs
- Recommend penalties/ action, transfer/ suspension/ termination to Human Resources
- Monitor the action taken by Human Resources
- Looking into allegations of victimisation of the aggrieved person or any other person supporting the aggrieved
- Handle false complaints and prevent misuse of the Policy

**IC Constitution:**

Samunnati has established an IC in accordance with the Act and consists of six core members –

- Presiding Officer – Sr. Women Employee
- Two Member(s) – as finalised by Human Resources
- Two Member(s) – Female Members as chosen by the Presiding Officer
- One External Member who is committed to the cause of women or is familiar with issues relating to sexual harassment

In addition to the core members, one regional IC representative may be identified for larger regions by Human Resources and invited for IC interactions. Samunnati shall ensure that at least half of the total members in the IC shall be women. Members in IC shall hold office for three years from the date of appointment and Samunnati shall reconstitute IC once every three years or more frequently as may be required. List of IC members shall be finalised by Human Resources in consultation with CEO.

**Refer Annexure – I for details of members of IC**

**Definitions/ Explanation – Sexual Harassment:**

Sexual harassment includes any one or more of the following unwelcome acts or behaviour (whether directly or by implication) namely -

- physical contact and advances;
- a demand or request for sexual favours, or
- making sexually coloured remarks,
- showing pornography, or
- any other unwelcome physical, verbal or non-verbal conduct of sexual nature.

The following circumstances if it occurs or is present in relation to or connected with any act or behaviour of Sexual Harassment may amount to Sexual Harassment –

- Implied/ explicit promise of preferential treatment or threat of detrimental treatment in employment / threat of present or future employment opportunities
- Interference with work/ creating an intimidating or offensive/ hostile work environment or

- Humiliating treatment

Determining what constitutes sexual harassment also depends upon the specific facts and the context in which the conduct occurs. Sexual harassment may take many forms – subtle and indirect, or blatant and overt.

- It may be towards an individual of the opposite sex or the same sex
- It may occur between peers or between individuals in a hierarchical relationship
- It may be aimed at coercing an individual to participate in an unwanted sexual relationship
- It may have the effect of causing an individual to change behaviour or work performance
- It may consist of repeated actions or may even arise from a single incident
- It may be Verbal, Physical or Visual/ Non-verbal forms, including emails, Whatsapp or text messages, letters etc.

Examples of the above include but are not limited to teasing, jokes, comments on another's body or appearance, offensive sexual flirtations, sexual advances or propositions, gender based comments, inquiries into one's sexual appearances, discussion of sexual activities, threats, insults, demeaning gestures, physical assault, brushing against another, impeding or blocking movement, unwanted physical contact, derogatory posters, sexually oriented pictures/ drawings/ cartoons, display of sexually suggestive objects, pictures, emails, lurid stares, stalking etc.,

**Aggrieved Person**: refers to a person in relation to Workplace whether employed or not, who alleges to have been subject to any act of sexual harassment by the Respondent.

**Respondent:** refers to a person against whom the aggrieved person has made a complaint.

**Procedure for Filing Complaints**

Any employee or representative of Samunnati who feels and is being harassed sexually directly or indirectly may submit a complaint of the alleged incident to any member of the IC in writing within **90 days** of such occurrence and in case of a series of incidents, within 90 days from the date of last incident.

IC may also permit an extension of another 90 days if the complaints and situation warrant such an extension. Where a complaint cannot be submitted in writing, the Aggrieved Person shall contact IC any member of the IC and it shall be the responsibility of the Member to record the complaint in writing and also reasons as to why the complaint is not being submitted in writing by the Aggrieved Person. If the Aggrieved Person is unable to record a complaint due to their physical
/ mental incapacity - a relative, friend or a colleague of the Aggrieved Person who has knowledge of such incident may approach IC to record a complaint.

Any complaint so recorded shall include the date & time of such incident, details of the incident, witnesses (if any), evidence available (if any) along with details of the person(s) involved in harassment. Aggrieved Person may also choose to attach any additional material which may assist IC in the investigation process.

**Investigation/ Enquiry by IC:**

IC shall decide the place and time for hearing the complaint and shall intimate the date, time and place of hearing to the Complainant and Respondent. The IC shall follow the principle of Natural Justice while handling such complaints. IC may, if required, ask the Aggrieved Person to furnish additional information about the alleged harassment.

- IC shall provide a copy of the complaint along with supporting documents of such complaints to the Respondent within **7 working days**
- Respondent shall file a **reply within 10 working days** of receipt of the complaint along with list of documents, names and addresses of witnesses
- IC shall have the right to call the person against whom the complaint is made or any other witnesses as may be necessary
- If the Respondent does not respond or is absent for 3 consecutive enquiries, then IC shall have the right to terminate the enquiry/ give a decision in favour of the Aggrieved Person.

**IC shall ensure that the enquiry is completed within 30 days of receipt of complaint. For any hearing/ enquiry a quorum of 3 members of IC including the Presiding Officer must be present. IC may extend the enquiry for another 30 days if need be and decision shall be taken by all members of IC jointly.**

At no point of time during the enquiry, Aggrieved Person or the Respondent shall bring any legal practitioner to represent them before IC. Enquiry shall be conducted in a language that the parties are comfortable with and IC shall ensure that the proceedings of the enquiry are documented. Venue of the enquiry may be finalised by IC after discussion with the Aggrieved Person.

**Third party harassment:** Where sexual harassment complaint is on a third party/ outsider, IC shall decide on a suitable course of action and take necessary steps to ensure that the complaint is handled fairly and shall assist the aggrieved person in enquiry proceedings. If a Third party raises complaint against an employee, IC shall handle the complaint as per the provisions of this Policy.

**Settlement of the complaint through conciliation:** No settlement is permitted once the complaint has been recorded with IC. IC shall however resolve the complaint through conciliation without a formal enquiry if the Aggrieved Person and Respondent agree. In such cases, IC shall ensure documentation of reasons for doing so and also keep Human Resources informed on the action to be taken.

**Confidentiality of Complaints:**
It shall be the duty of IC to ensure confidentiality of such complaints and the name of the aggrieved person shall not be discussed outside the enquiry and ensure that those who are part of the enquiry proceedings are briefed as well. To protect the interests of both the parties concerned, IC shall maintain confidentiality throughout the investigation process and subsequently, to the extent practically possible and appropriate under the circumstances.

**Protection/ Welfare of the Aggrieved Person:** IC may recommend to the management and Human Resources for the Aggrieved Person to be transferred or go on leave, if required. Prima facie, if IC is satisfied that the complaint seems genuine, then it may recommend that the Respondent be transferred / suspended, in the interim, till such time the enquiry is closed.

**Documentation of enquiry proceedings:** IC shall ensure that the proceedings of enquiry are documented and forwarded to Human Resources along with all relevant documents including the complaint, material evidence etc., for maintenance of records in a confidential manner. Minutes of each such enquiry proceeding shall be documented by a member of IC and duly signed by all the members who were present. Documentation process shall be complete **within 3 working days** from the date of each proceeding. Human Resources shall keep the IC informed in writing of all action taken updates on previous enquiry/proceedings and the IC shall take note of the same.

Details of sexual harassment instances if any, along with proceedings and the action taken update shall be tabled to the Board of the Company for information.

**False Complaints:**
If IC arrives at the conclusion that allegation made against the Respondent is malicious and/or made with a false intent and/or the Aggrieved Person has provided false/ misleading documents, IC may recommend to Human Resources to take necessary action against the Aggrieved Person. Possible actions shall include suspension without pay, fine, stoppage of increment/ incentives, demotion, termination or dismissal from the services of Samunnati or any other action as found appropriate.

**Implementation of decision(s) recommended by IC:**
Human Resources shall be responsible for ensuring that action recommended by IC are considered and implemented. In case the recommendations of the IC are not implemented, Human Resources shall inform the IC on reasons for the same

and duly obtain consent from all members of IC. In case, IC recommends legal action as per Indian Law, then Human Resources shall notify it to the management and initiate appropriate action.

Human Resources shall also be responsible for offering necessary psychological, emotional and physical support to the Aggrieved Person, if required.

**Exceptional circumstances:**
Under exceptional circumstances, if the complaint is against any member of IC, then the other members of IC shall reconstitute the Committee in consultation with CEO and proceed with the enquiry as per the provisions of this policy. If the complaint is recorded against the CEO, then IC shall recommend necessary action to Human Resources and it shall be the responsibility of Human Resources to bring it to the notice of Board and implement the decision taken by the Board.

**References:**

a. Guidelines issued by the Supreme Court of India in Vishaka & Others Vs. State of Rajasthan & Others (Referred to as "Vishaka Guidelines")
b. The Sexual Harassment of Women at Workplace (Prevention, Prohibition & Redressal) Act, 2013 (Referred to as "the Act")

**A copy of this policy shall be shared with all employees and also be placed on a common folder easily accessible by all employees/stakeholders. Awareness sessions shall be conducted by Human Resources/ Training team periodically.**

**ANNEXURE - I**

**INTERNAL COMPLAINTS COMMITTEE (IC) - Samunnati Agri Value Chain Solutions Private Limited**

| MEMBER | ROLE | CONTACT PARTICULARS |
|---|---|---|
| **Ms. Poorna Pushkala C** | Presiding Officer | Mobile: +91 99496 67518<br>Email: poorna@samunnati.com |
| **Ms. Nandhini Thiruvenkatachari** | Member | Mobile: +91 9840330900<br>Email : nandhini.t@samunnati.com |
| **Ms. Aruna Subbaraman** | Member | Mobile: +91 97909 76934<br>Email: aruna@samunnati.com |
| **Mr. Phani Kumar Thota** | Member | Mobile: +91 9160017519<br>Email: phani.thota@samunnati.com |
| **Mr. Saiprasad Somayajula** | Member | **Mobile: +91 7358037245**<br>**Email:** saiprasad.somayajula@samunnati.com |
| **Ms. Neha Kedia** | External Member | Mobile: +91 98203 54076<br>Email: nehak05@gmail.com |

The CEO shall be authorised to replace the Committee members in consultation with CHRO and IC's presiding officer based on changes in employment terms of any of the members. External member may be replaced by CEO directly or basis recommendation from Presiding Officer of IC.

**INTERNAL COMPLAINTS COMMITTEE (IC) – SAMUNNATI FINANCE PRIVATE LIMITED**

| MEMBER | ROLE | CONTACT PARTICULARS |
|---|---|---|
| **Ms. Anjana Varghese** | Presiding Officer | Mobile: +91 9962250201 Email: anjana.varghese@samunnati.com |
| **Ms. Aswini S** | Member | Mobile: +91 9884065601<br>Email: aswini.s@samunnati.com |
| **Ms. Shobana Srinivasan** | Member | Mobile: +91 9840127857<br>Email: shobana.srinivasan@samunnati.com |
| **Mr. Ramakrishnan C S** | Member | Mobile: +91 95390 04560<br>Email: ramakrishnan.cs@samunnati.com |
| **Mr. Saiprasad Somayajula** | Member | Mobile: **+91 7358037245**<br>Email: saiprasad.somayajula@samunnati.com |
| **Mr. Kiran M Vedula** | Member | Mobile: +91 9930612303<br>Email: kiran.vedula@samunnati.com |
| **Ms. Neha Kedia** | External Member | Mobile: +91 98203 54076<br>Email: nehak05@gmail.com |

The CEO is authorised to replace the Committee members in consultation with CHRO and IC's presiding officer based on changes in employment terms of any of the members. External member may be replaced by CEO directly or basis recommendation from Presiding Officer of IC.

**Note: Samunnati Finance Private Limited has adopted the policy of Samunnati Agri Value Chain Solutions Private Limited**

**INTERNAL COMPLAINTS COMMITTEE (IC) – Samunnati Agri Innovations Lab Private Limited**

| MEMBER | ROLE | CONTACT PARTICULARS |
|---|---|---|
| **Ms. Prerana Desai** | Presiding Officer | Mobile: +91 77188 08689<br>Email: prerana.desai@samunnati.com |
| **Ms. Balambika Muthusamy** | Member | Mobile: +91 7338881257<br>Email: balambika.m@samunnati.com |
| **Ms. Anjana Varghese** | Member | Mobile: +91 9962250201<br>Email: anjana.varghese@samunnati.com |
| **Mr. Ankur Rana** | Member | Mobile: +91 73388 05635<br>Email: ankur.rana@samunnati.com |
| **Mr. Anuj Narang** | Member | Mobile: +91 9810109988<br>Email: anuj.narang@samunnati.com |
| **Ms. Neha Kedia** | External Member | Mobile: +91 98203 54076<br>Email: nehak05@gmail.com |

The CEO is authorised to replace the Committee members in consultation with CHRO and IC's presiding officer based on changes in employment terms of any of the members. External member may be replaced by CEO directly or basis recommendation from Presiding Officer of IC.

**Note: Samunnati Agri Innovations Lab Solutions Private Limited has adopted the policy of Samunnati Agri Value Chain Private Limited**

**INTERNAL COMPLAINTS COMMITTEE (IC) – SAMUNNATI FOUNDATION**

| MEMBER | ROLE | CONTACT PARTICULARS |
|---|---|---|
| **Ms. Poorna Pushkala C** | Presiding Officer | Mobile: +91 99496 67518<br>Email: poorna@samunnati.com |
| **Mr. Sridhar Easwaran** | Member | Mobile: +91 95944 88765<br>Email: sridhar.easwaran@samunnati.com |
| **Ms. Aruna Subbaraman** | Member | Mobile: +91 97909 76934<br>Email: aruna@samunnati.com |
| **Ms. Ishita Avinash Meshram** | Member | Mobile: +91 9011108845<br>Email: ishita.meshram@samunnati.com |
| **Mr. Ramakrishnan C S** | Member | Mobile: +91 95390 04560<br>Email: Ramakrishnan.cs@samunnati.com |
| **Ms. Neha Kedia** | External Member | Mobile: +91 98203 54076<br>Email: nehak05@gmail.com |

The CEO is authorised to replace the Committee members in consultation with CHRO and IC's presiding officer based on changes in employment terms of any of the members. External member may be replaced by CEO directly or basis recommendation from Presiding Officer of IC.

**Note: Samunnati Foundation, has adopted the policy of Samunnati Agri Value Chain Solutions Private Limited**