

## **DVARA KSHETRIYA GRAMIN FINANCIAL SERVICES PRIVATE LIMITED**

Regd. Off.: 10<sup>th</sup> Floor, Phase -1, A1, IITM-Research Park,  
Kanagam Village, Taramani, Chennai – 600 113

| <b>DVARA KSHETRIYA GRAMIN FINANCIAL SERVICES PRIVATE LIMITED</b> |   |
|--|---|
| <b>POLICY</b>  | <b>POLICY ON PREVENTION OF SEXUAL HARASSMENT OF WOMEN AT WORKPLACE (POSH)</b> |
| <b>VERSION</b>   | <b>4.0</b>  |
| <b>DATE OF APPROVAL OF BOARD</b>                                 | <b>February 08, 2023</b>  |
| <b>DATE OF LAST APPROVAL BY BOARD</b>                            | <b>26 October 2025</b>  |
| <b>PROCESS OWNER</b>   | <b>HUMAN RESOURCES</b>  |

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### VERSION

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## **Prevention Of Sexual Harassment at Workplace Policy**

### **1. The Act**

The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (hereafter referred as “Act”) is a Central Government legislation to provide protection against sexual harassment of women at workplace and for the prevention and redressal of complaints of sexual harassment and for matters connected therewith or incidental thereto.

Sexual harassment results in violation of the fundamental rights of a woman to equality under Articles 14 and 15 of the Constitution of India and her right to life and to live with dignity under Article 21 of the Constitution and right to practice any profession or to carry on any occupation, trade, or business with includes a right to a safe environment free from sexual harassment.

### **2. Introduction**

DVARA KGFS is an equal opportunity employer committed to provide a free, safe, and secure working environment for all its employees, especially women. Sexual harassment constitutes a gross violation of women's right to equality and dignity.

We follow a Zero Tolerance Policy. A “zero tolerance” policy means working to prevent any inappropriate behaviour, so corrective actions, up to and including formal discipline, will be taken when policy violations occur, even if they are not so serious as to be unlawful. Sexual harassment will not be tolerated, and such behaviour will be addressed seriously, and appropriate corrective action taken. Even though a sexual comment does not in itself rise to the level of creating a hostile work environment under the law, such a comment is unacceptable in the workplace, violates the Company's Zero Tolerance Policy and will be subject to a corrective action. Hence a policy has been framed for the prevention and the redressal of any sexual harassment at the workplace in keeping with the principles of equality, freedom, life, and liberty as enshrined in the Constitution of India.

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. If any aspect relating to sexual harassment not explicitly covered in this policy is provided for by the law, then the law will be applicable. In case of any conflict between the policy and the law, the law will prevail.

### **3. Applicability & Scope**

This Policy is applicable and extends to all employees / stakeholders (Including Trainees), Consultants, Contract, Vendors, Customers and any other individual associated with the company and are eligible to raise an issue under the provisions of the policy. It is applicable to all workplaces, offices, branches, Centres irrespective of number of employees or activities or turnover.

### **4. Definitions:**

#### **Complainant**

Is the aggrieved woman, in relation to a Workplace, a person of any age or employment/work status, who alleges to have been subjected to any act of Sexual Harassment by the Respondent. It includes all women whether engaged directly or through an agent including a contractor, with or without the knowledge of the principal employer. They may be working for remuneration, on a voluntary basis or

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otherwise. Their terms of employment can be express or implied. Further, she could be a co-worker, a contract worker, probationer, trainee, apprentice, or called by any other such name. The Act also covers a woman, who is working in a dwelling place or house.

### **Respondent**

Respondent means a person against whom the Complainant has made a complaint to the Sexual Harassment Internal Complaints Committee under this policy.

### **Sexual harassment**

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

- (i) physical contact or advances.
- (ii) Quid pro-quo harassment.
- (iii) a demand or request for sexual favours through verbal/ non-verbal communication.  
display of pictures, posters, calendars, graffiti, objects, promotional material, reading materials or other materials that are sexually demeaning or pornographic. This includes such sexual displays on workplace computers or cell phones and sharing such displays while in the workplace.
- (iv) making sexually coloured remarks.
- (v) showing pornography.
- (vi) Sexually oriented gestures, noises, remarks, jokes or comments about a person's sexuality or sexual experiences, which create a hostile work environment.
- (vii) Physical assaults of a sexual nature such as touching, pinching, grabbing, brushing against another employee's body or poking another employee's body.
- (viii) Rape, sexual battery, molestation or attempts to commit these assaults.
- (ix) Hostile actions against an individual viz. sabotaging an individual's work.
- (x) any other unwelcome physical, textual, graphic, electronic (SMS, WhatsApp, Instagram, Facebook etc), verbal or non-verbal conduct of sexual nature.

The above list is not exhaustive, but only indicative in nature.

### **Sexual Harassment Determinants**

The following circumstances, among other 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;

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

The above list is illustrative and not exhaustive. In case of any doubts as to whether any conduct amounts to sexual harassment, please contact (Internal Complaints Committee (ICC) or Regional HR or CHRO) for clarification.

### **Workplace**

Workplace is defined as any place where the Complainant or Respondent is employed, works, or visits in connection with work (including while on travel), including transportation provided by the employer during the course of or arising out of employment, a dwelling place or house.

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### **Employer**

Any person (whether contractual or not) responsible for the management, supervision and control of a designated workplace.

### **Quid Pro Quo (Latin for “something for something”):**

This form of sexual harassment occurs when a supervisor or manager:

- demands, as an explicit or implied term or condition of employment decisions, a subordinate submit to sexual advances (this may include situations which began as reciprocal relationships, but which later ceased to be reciprocal); and/or;
- makes requests for sexual favors or other verbal, visual or physical conduct of a sexual nature that is an explicit or implied term or condition of employment decisions.

Some of the examples of quid pro quo harassment include:

- Requests for sexual favors in exchange for a promotion or raise;
- Express or implied statement that a person will be demoted or fired if she or he does not submit to a sexual request or actually carrying out the threat

### **Roles and Responsibilities**

It is the responsibility of all to respect the rights of others and to never encourage harassment. It can be done by:

- a. Refusing to participate in any activity which constitutes harassment
- b. Supporting the person to reject unwelcome behaviour.
- c. Acting as a witness if the person being harassed decides to lodge a complaint.

### **Redressal Mechanism**

Formal Intervention in compliance with the Act, any complaint under this policy shall be followed by a formal redressal mechanism as described below in this Policy.

#### **5. Internal Complaints Committee (Henceforth known as ‘ICC’)**

In our endeavour to provide a safe environment ; to prevent instances of sexual harassment and to receive and effectively deal with complaints pertaining to the same, DVARA KGFS has constituted a ‘Internal Complaints Committee’ (hereinafter referred to as ICC) at Corporate and Zonal Offices.

The committee comprises of:

- i. Presiding Officer: A woman employed at a senior level in the organisation.
- ii. At least 2 members from amongst employees, committed to the cause of women or who have/ had experience of social work or have legal knowledge.
- iii. One external member from amongst non-governmental organizations or associations committed to the cause of women or a person familiar with the issues relating to sexual harassment
- iv. At least one half of the total members nominated will be women.
  - The below are the regional committees who will be co-opted into the ICC to cover the various locations of the Company.
    1. East 1 – Jharkhand
    2. East 2 – Chhattisgarh
    3. North – Haryana
    4. North – Uttarakhand

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5. South 1 – Thanjavur
  6. South 2 – Madurai
- v. The committee will be responsible for:
- Receiving complaints of sexual harassment at the workplace
  - Initiating and conducting inquiry as per the established procedure, within 90 days from the date of receipt of the complaint.
  - Submitting findings and recommendations of inquiries
  - Coordinating with the employer in implementing appropriate action within 60 days from the date of conclusion of enquiry/ proceedings.
  - Maintaining strict confidentiality throughout the process as per established guidelines
  - Submitting annual reports in the prescribed format
- The regional representatives would participate in the meetings of ICC, any investigations / POSH related initiatives that are required to be conducted in their respective locations / zones. The list of Regional ICC members will be circulated across the organisation for internal reference.

### Key Deliverables - External Member

- **Independent Oversight: Provide an unbiased perspective on complaints and issues.**
- **Complaint Investigation: Participate actively in the inquiry process to ensure fair and thorough investigations.**
- **Compliance Assurance: Ensure adherence to legal guidelines and internal policies related to sexual harassment prevention.**
- **Supervisory Oversight on Reporting: The external member will provide supervisory oversight and guidance to the ICC during the compilation of findings and recommendations. The responsibility of final reporting to the authorities will rest with the committee chair, ensuring alignment with legal and organizational standards.**
- **Awareness and Training: Conduct training sessions and awareness programs for employees on their rights and responsibilities under the sexual harassment policies.**
- **Confidentiality: Maintain the confidentiality of all proceedings and protect the privacy of involved parties**

In compliance with the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Rules 2013, the member appointed from non-government organisations shall be entitled to sitting fees of Rs. 5000/- per sitting (All-inclusive) for holding the proceedings of the Internal Committee.

Each member shall hold office for a specified period, not exceeding 3 years, from the date of their nomination. Notwithstanding the foregoing, DVARA KGFS reserves the right to reconstitute the committee or change any of its members/ review the functioning of the ICC from time to time. The details about the current members of the ICC are enclosed in Annexure.

### Lodging a Complaint

Any aggrieved woman may make, in writing, a complaint of sexual harassment at workplace to the Internal Committee within a period of three months from the date of incident and in case of a series of incidents, within a period of three months from the date of last incident.

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The Internal Committee can extend the timeline by another 3 months for reasons recorded in writing, if it is satisfied that the circumstances were such which prevented the woman from filing a complaint within the said period. Provided that where such a complaint cannot be made in writing, the Presiding Officer or any Member of the Internal Complaint Committee shall render all reasonable assistance to the women for making the complaint in writing.

1. If the Aggrieved Woman is unable to make a complaint on account of her physical incapacity, a complaint may be filed by:

- a. her relative or friend; or
- b. her co-worker; or
- c. an officer of the National Commission for Women or State Women's Commission; or
- d. any person who has knowledge of the incident, with the written consent of the Aggrieved Woman

2. If the Aggrieved Woman is unable to make a complaint on account of her mental incapacity, a complaint may be filed by:

- a. her relative or friend; or
- b. a special educator; or
- c. a qualified psychiatrist or psychologist; or
- d. the guardian or authority under whose care she is receiving treatment or care; or
- e. any person who has knowledge of the incident jointly with the Aggrieved Woman's relative or friend or a special educator or qualified psychiatrist or psychologist, or guardian or authority under whose care she is receiving treatment or care

3. If the Aggrieved Woman 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 her consent.

4. If the Aggrieved Woman is deceased, a complaint may be filed by any person who has knowledge of the incident, with the written consent of her legal heir. The complaint shall be submitted by the complainant to the ICC in writing or shall be submitted to the ICC electronically at **POSH@dvarakgfs.com**. The complaint can also be physically submitted / couriered to the Company's registered office, with the envelope addressed to ICC.

### **Receiving a Complaint (guidelines)**

Dealing with incidents of harassment is not like any other type of dispute. Complainants may be embarrassed and distressed, and it requires tact and discretion while receiving the complaint. The following points are to be kept in mind by the receiver of the complaint:

- Complaints are listened to and the complainant informed that the Company takes the concerns seriously. Complainant is informed that these concerns will be reported to the appropriate committee and follow up will be done speedily.
- Situations are not to be pre-judged. Written notes are to be taken while listening to the person. When taking notes, complainants own words, where possible, are to be used accurately. It shall be ensured that clear description of the incident in simple and direct terms are prepared and details are confirmed with the complainant.
- All notes are kept strictly confidential. Complainant's consent is taken to allow proceeding with the matter, which involves a formal investigation.
- The complainant is advised that although the process is confidential, the respondent needs to be informed and any witnesses and persons directly involved in the complaint process will also learn of the complainant's identity. Care is taken to prevent any disadvantage to or victimization of either the complainant or the respondent.

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### **Resolution procedure through conciliation:**

Once the complaint is received, before initiating the inquiry, the committee may take steps to conciliate the complaint between the complainant and the respondent. This is only if requested by the aggrieved woman. No monetary settlement can be made as a basis of conciliation. In case a settlement is arrived at, the committee shall record & report the same to the CHRO/ Managing Director & CEO for taking appropriate action. Resolution through conciliation is to happen within 2 weeks of receipt of complaint.

The committee shall provide copies of the settlement to complainant & respondent. Where a settlement is arrived at, no further inquiry is to be conducted by the committee.

### **Compensation**

The defendant may also be asked to pay compensation to the Complainant, with a clear understanding that no retaliatory steps will be taken by the defendant against the Complainant. While determining the compensation amount to be paid and other operative details regarding compensation, the Committee shall keep in mind various factors like loss of career opportunity for the Complainant due to this incident, medical expenses incurred for physical or psychiatric treatment, mental trauma and emotional distress, income and financial status of the Respondent etc.

### **Resolution procedure through formal inquiry**

The committee will initiate 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 term or condition of the settlement arrived through conciliation, has not been complied with by respondent

### **Manner and Procedure of inquiry into complaint:**

The Committee will ensure that the Complainant and the Respondent are called separately, so as to ensure freedom of expression and an atmosphere free of intimidation. The Committee shall have similar powers as vested in a civil court trying a similar suit under the Code of Civil Procedure, 1908.

- Complainant should submit the complaint along with supporting documents and the names of the witnesses, if any.
- The Committee will hold a meeting with the Complainant within seven days of receipt of the complaint.
- At the first meeting, the Committee members shall hear the Complainant and record her allegations. The Complainant can also submit any corroborative material with a documentary proof, oral or written material, etc., to substantiate her complaint.
- The Committee shall proceed with the enquiry and communicate the same to the Complainant and Respondent.
- Upon receipt of the complaint, the committee will send 1 copy of the complaint to Respondent within 7 days of receiving the complaint.
- Respondent shall reply with all supporting documents within 10 days of receiving the copy of the complaint.
- Thereafter, the Respondent may be called for a deposition before the Committee and an opportunity will be given to him to give an explanation, where after, an inquiry shall be conducted and concluded.

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- The Complainant shall be provided with a copy of the written explanation submitted by the Respondent.
- If the Complainant or the respondent desires any witness/es to be called, they shall communicate in writing to the Committee the names of witness/es that they propose to call.
- The Committee shall call upon all witnesses mentioned by both the parties.
- The Committee shall provide every reasonable opportunity to the Complainant and the Respondent for putting forward and defending their respective case.
- If either party desires to tender any documents by way of evidence before the Committee, the same is to be supplied as original copies of such documents. Signatures should be affixed on the respective documents to certify these to be original copies.
- No legal practitioner can represent any party at any stage of the inquiry procedure;
- The Complaints Committee is to make inquiry into the complaint in accordance with the principles of natural justice;
- In conducting the inquiry, a minimum of three committee members including the Presiding Officer are to be present;
- The employer shall provide all necessary assistance for the purpose of ensuring full, effective and speedy implementation of this policy;
- Where sexual harassment occurs as a result of an act or omission by any third party or outsider, the company shall take all steps necessary and reasonable to assist the affected person in terms of support and preventive action.

In the event, the complaint does not fall under the purview of Sexual Harassment, or the complaint does not mean an offence of Sexual Harassment, the same would be dropped after recording the reasons thereof. If the complainant or respondent desires to cross examine any witnesses, the Committee facilitates the same and records the statements. In case complainant or respondent seeks to ask questions to the other party, they may give them to the Committee which asks them and records the statement of the other party. Any such inquiry is completed, including the submission of the Inquiry Report, within 90 days from the date on which the inquiry is commenced. The inquiry procedure should ensure absolute fairness to all parties.

### **Interim relief**

During pendency of the inquiry, on a written request made by the complainant, the committee may recommend to the employer to:

- 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
- Grant such other relief as may be appropriate

Once the recommendations of the interim relief are recommended the same will be informed to the ICC.

### **Termination of Inquiry**

ICC may terminate the inquiry or give ex-parte decision, if complainant or respondent respectively is absent for 3 consecutive hearings, without sufficient reason. 15 day written notice is to be given to the party, before termination of enquiry or ex-parte order.

### **Action to be taken after inquiry.**

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Post the inquiry, the committee submits its report containing the findings and recommendations to the employer, within 10 days of completion of the inquiry.

### **Complaint unsubstantiated**

Where the committee arrives at the conclusion that the allegation against the respondent has not been proved, it recommends to the employer that no action is required to be taken in this matter. Further, the committee should ensure that both parties understand that the matter has been fully investigated, that the matter is now concluded, and neither will be disadvantaged within the Company.

### **Complaint substantiated.**

Where the committee arrives at the conclusion that the allegation against the respondent has been proved, it recommends to the employer to take necessary action for sexual harassment as misconduct, in accordance with the applicable service rules and policies, and this may include:

- i. Counselling
- ii. Censure or reprimand
- iii. Written Apology to be tendered by respondent
- iv. Written warning
- v. Demotion to a lower position / grade
- vi. Withholding promotion and/or increments
- vii. Suspension
- viii. Termination
- ix. Or any other action that the employer may deem fit.

The above list is indicative and not exhaustive. The Company will act upon the recommendations within 60 days from the date of closure of the inquiry and confirm the implementation of the same to the ICC.

Post implementation of the actions, follow up with the complainant should also occur to ascertain whether the behaviour has in fact stopped/the solution is working satisfactorily and if no victimization of either party is occurring.

## **6. Penal Consequences of Sexual Harassment**

In case the Committee finds the degree of offence coverable under the Indian Penal Code, then this fact shall be mentioned in its report and appropriate action shall be initiated by the ICC, for making a Police Complaint. Under the Indian Penal Code, (IPC), the newly introduced Section (S. 354A) which deals with Sexual Harassment has made this a 'cognizable offense' i.e. a person charged with Sexual Harassment may be arrested without a warrant.

## **7. Malicious Allegations**

Where the committee arrives at the 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, it may recommend to the employer to take action against the woman or the person making the complaint.

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While deciding malicious intent, the committee should consider that mere inability to substantiate a complaint need not mean malicious intent. Malicious intent must be clearly established through a separate inquiry.

Where the ICC, arrives at a conclusion that during the inquiry any witness has given false evidence or produced any forged or misleading document, it may recommend to CHRO, to take appropriate disciplinary action.

### **8. Failure to take Action on a Complaint**

Where a complaint of sexual harassment is made to a reporting manager or a member of the Internal Committee, but no action is initiated, this neglect may be deemed as misconduct and action, as appropriate may be initiated against the manager concerned for neglect or compromising the working environment of the organization.

### **9. Workplace Etiquette Regarding Professional Relationships**

Employees should maintain a professional decorum in the workplace. Any personal relationship between employees in same team especially in a reporting relationship is strongly discouraged.

### **10. Confidentiality**

The contents of the complaint, 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. However, information regarding the justice secured to any Complainant may be disseminated if so, required without disclosing the identity and other particulars that may lead to identification of the Complainant. Any person contravening the confidentiality clauses is subject to disciplinary action as decided by CHRO/Managing Director & CEO.

### **11. Appeal**

Any party not satisfied or further aggrieved by the implementation or non-implementation of recommendations made, may appeal to the appellate authority, as prescribed in the Code of Conduct of the Company, within 90 days of the recommendations being communicated.

### **12. Awareness**

Awareness sessions will be organized to:

- Carry out orientation programs and seminars for the Members of the ICC.
- Conduct capacity building and skill building programs for the Members of the ICC.
- Declare the names and contact details of all the Members of the IC.

### **13. Communication to Employees**

DVARA KGFS is committed to providing a safe working environment for all its employees. Workshops and sensitization programs shall be conducted at regular intervals and all employees are expected to participate in the same. This policy should be communicated to employees during the induction and an excerpt of this policy should be handed over, any amendments in the policy will be shared via email. Constant reminders on the policy will be sent to all the employees via email every month by the HR representative.

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Employees are also encouraged to bring to the notice of their reporting managers/ senior management any breach in safety or possibility of negative impact on the working space, safety and security of the working environment.

### **14. Legal Compliance**

The IC shall in each calendar year prepare, in such format as may be prescribed, an annual report and submit the same to the Company and to the District Office. The report shall have the following details:

- number of complaints of Sexual harassment received in the year
- number of complaints disposed of during the year
- number of cases pending for more than 90 days
- number of workshops or awareness program against Sexual Harassment carried out

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### ANNEXURE – CONSTITUTION OF INTERNAL COMPLAINTS COMMITTEE

| Members               | Role                 | Mobile Number |
|-----------------------|----------------------|---------------|
| Ms. Deepa Anand       | Presiding Officer    | 9830014008    |
| Ms. Marie Banu        | External Member      | 9884700029    |
| Ms. Janaki Natarajan  | Facilitating Officer | 9677060662    |
| Ms. Vidya Sambasivam  | Member               | 9841003132    |
| Ms. Bheema Upadhyay   | Member               | 9926904333    |
| Mr. Vikram Babu       | Member               | 9620030305    |
| Mr. Sandeep Raghunath | Member               | 9884203682    |

Mail ID – [posh@dvarakgfs.com](mailto:posh@dvarakgfs.com)

#### Composition of Regional ICC

| Role                        | Zone            |
|-----------------------------|-----------------|
| Presiding Officer - East 1  | Ranchi RO       |
| Member - East 1             | Phusro          |
| Member - East 1             | Ranchi RO       |
| Presiding Officer - East 2  | Raipur ZO       |
| Member - East 2             | Raipur ZO       |
| Member - East 2             | Chhattisgarh HQ |
| Presiding Officer - North   | Athurwala       |
| Member - North              | Sonepat         |
| Member - North              | Dehradun ZO     |
| Presiding Officer - South 1 | Thanjavur ZO    |
| Member - South 1            | Ariyalur RO     |
| Member - South 1            | Ariyalur RO     |
| Presiding Officer - South 2 | Madhukur North  |
| Member - South 2            | Merpanaikadu    |
| Member - South 2            | Pudukkottai RO  |