

Prevention of Sexual Harassment Policy (“POSH Policy”)

1. Objective

This Policy has been developed in alignment with the provisions of "The Sexual Harassment of Women at Workplace (Prevention, Prohibition, and Redressal) Act, 2013" and the associated rules (hereinafter referred to as "the Act"). It encompasses all the critical aspects of the Act, and for any further clarification, reference should be made to the Act, whose provisions shall take precedence.

This policy applies to KVGGN Synergy Private Limited, along with its subsidiary companies, joint ventures, and affiliates in India, where KVGGN Synergy Private Limited holds management control, either directly or through its subsidiaries (collectively referred to as "KVGGN Synergy", "the Company", or "the Employer").

The "Policy on Prevention of Sexual Harassment of Women at the Workplace" aims to safeguard employees from sexual harassment, ensuring a safe and respectful workplace while addressing the prevention, redressal, and resolution of related complaints.

2. Definitions

Sexual Harassment: Sexual harassment can occur not only when an individual uses sexual behavior to control, influence, or affect another person’s career, salary, or job but also between coworkers. It may also occur between a KVGGN Synergy employee and someone outside the company with whom the employee interacts in the course of their work.

"Sexual Harassment" includes one or more of the following unwelcome acts or behaviors (whether direct or implied):

- Any unwelcome sexually determined behavior or pattern of conduct that causes discomfort or humiliation to the person at whom the behavior is directed, including:
 - Physical contact and advances.
 - Requests or demands for sexual favors.
 - Sexually suggestive remarks or comments about a person's clothing or body.
 - Displaying pornography, sending or posting sexual jokes, pranks, or teasing, and distributing sexual demeaning or offensive images, cartoons, or other materials via email, SMS, MMS, etc.
 - Repeatedly requesting social interaction during off-duty hours or making continuous expressions of sexual interest against a person’s wishes.
 - Giving gifts or leaving objects that have sexual connotations.
 - Even teasing, innuendos, taunts, physical confinement against one’s will, or any action likely to intrude on an individual’s privacy.
 - Persistent following, watching, or contacting an individual.
 - Any other unwelcome physical, verbal, or non-verbal conduct of a sexual nature.

The following circumstances, when associated with any sexually determined act or behavior, constitute sexual harassment:

Implied or explicit promises of preferential treatment in employment.

Implied or explicit threats of detrimental treatment in employment.

Implied or explicit threats regarding present or future employment status.

Interference with a person's work or the creation of an intimidating, offensive, or hostile work environment.

Humiliating treatments are likely to affect the individual's health or safety.

The "reasonable person" standard is used to assess whether the conduct was offensive and what a reasonable person would have done in similar circumstances. Furthermore, it is important to emphasize that the determination of whether harassment has occurred is not based on the intention of the individuals involved, but rather on the experience of the aggrieved party.

Aggrieved Party: In a workplace context, an individual (man or woman) of any age, whether employed or not, who alleges to have been subjected to any act of sexual harassment by the respondent. This includes individuals working on a contractual, temporary, or visitor basis.
Respondent: A person against whom a complaint of sexual harassment has been lodged by the aggrieved party.

Employee: A person employed at the workplace for any work on a regular, temporary, ad-hoc, or daily wage basis, either directly or through an agent, including a contractor. This applies regardless of whether the principal employer is aware of the arrangement, whether for remuneration or not, or whether working on a voluntary basis. It also includes co-workers, contract workers, probationers, trainees, apprentices, or any other individual employed by any other designation.

Workplace: This includes the registered or corporate office, head office, branch offices, site offices, factories, business travel, official gatherings, or any other gatherings involving office employees. Considering current practices, this policy will also extend to work-from-home arrangements.

Employer: The individual responsible for the management, supervision, and control of the workplace.

3. Roles and Responsibilities

Responsibilities of Individuals:

It is the responsibility of everyone to respect the rights of others and to refrain from engaging in or encouraging harassment. This can be achieved by:

- Refusing to participate in any activity that constitutes harassment.
- Supporting the individual in rejecting unwelcome behavior.
- Acting as a witness if the individual being harassed chooses to file a complaint.

All employees are encouraged to advise others when their behavior is unwelcome. While some behaviors may not be intentional, this does not justify the actions. However, it provides an opportunity for individuals to recognize and modify their behavior, ensuring a respectful environment for all.

Responsibilities of Managers

All managers at KVGGN Synergy are responsible for ensuring that no employee is subjected to harassment and that equal treatment is upheld in the workplace. They must also ensure that all employees are aware that harassment will not be tolerated, that any complaints will be taken seriously, and that neither the complainant, respondent(s), nor witnesses will be subjected to any form of victimization.

This policy will be prominently displayed within the Company premises.
The Human Resources (HR) department will publish the guidelines and ensure that communication

Regarding this policy, it is disseminated to all employees at least once a year.
Every employee has a personal responsibility to contribute to maintaining a work environment that is free from harassment and discrimination.

4. Complaint's mechanism and Grievance Redressal

Considering the sensitivity of the subject, KVGGN Synergy has established a complaint mechanism through an Internal Committee ("IC" or the "Committee") to ensure timely resolution of complaints related to harassment and discrimination. The Committee is responsible for:

- Investigating all formal written complaints of sexual harassment and discrimination.
- Recommending and implementing appropriate remedial measures.
- Discouraging and preventing employment-related sexual harassment.

In accordance with the Sexual Harassment of Women at Workplace (Prevention, Prohibition, and Redressal) Act, 2013, and its associated rules, the Committee is composed of the following members:

Chairperson: A woman employed at a senior level within the Company, selected from among the employees. If a senior-level woman employee is unavailable, a woman employee from other offices or administrative units of the Company, or from any of the investor companies, will be nominated.

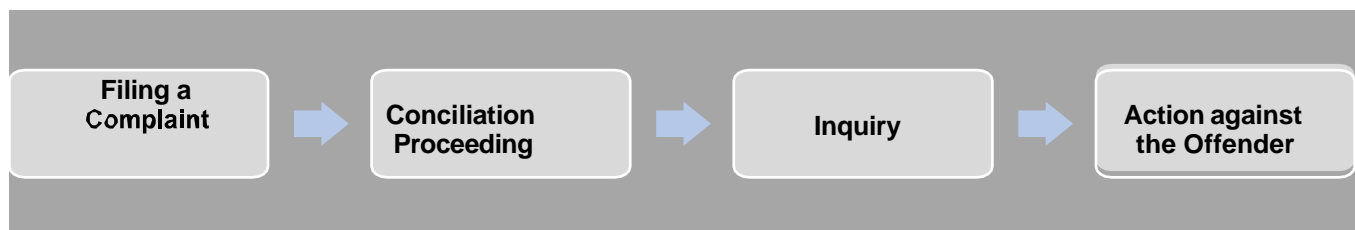
Two members: Employees who are dedicated to the cause of women's rights, have experience in social work, or possess legal expertise.

One Member: from a non-governmental organization (NGO) or an association dedicated to the cause of women, or an individual with expertise in issues related to sexual harassment.

Provided that at least one-half of the total Members so nominated shall be women.

The Members of the IC shall hold office for a maximum period of 3 years from the date of their nomination.

The grievance redressal procedure is captured in this section:



5. Filing a complaint

If an employee believes they are being harassed or discriminated against, they should clearly and promptly inform the offender that the behavior is unwelcome. If, for any reason, the employee does not wish to confront the offender directly, or if such a discussion does not effectively resolve the issue, the employee should report the concern to the Internal Committee (IC) within three months of the alleged incident. In the case of a series of incidents, the complaint should be made within three months from the date of the most recent incident.

The written complaint should include details of the incident(s), along with the names of the alleged harasser(s) and the victim(s), as applicable.

The IC will then provide guidance or offer support as requested by the employee and will initiate a prompt investigation to address and resolve the matter.

6. Conciliation Proceedings

Prior to initiating an inquiry, the Internal Committee (IC) may attempt to resolve the matter between the complainant and the alleged harasser through conciliation, provided the employee expresses a desire to do so.

If the issue is successfully resolved at this stage, the IC will document the resolution and forward it to the Company/Management for appropriate action, as per the recommendations. In such cases, the IC will not proceed with any further inquiry into the matter. It is important to note that monetary settlements will not be considered as a basis for conciliation.

However, if the issue remains unresolved, the IC will proceed with conducting a formal inquiry into the complaint.

7. Procedure for Inquiry

In conducting the survey, a minimum of three members of the Internal Committee (IC), including the chairperson, must be present.

The IC will provide both the complainant and the alleged offender with an opportunity to present their respective cases and will request supporting documents where necessary.

The inquiry must be completed within 90 days. Upon completion, the IC will hold an internal discussion and submit a written report with recommendations to the Company/Management within 10 days. The Company/Management is then required to act upon the recommendations within 60 days of receipt. A copy of the report will also be forwarded to both the complainant and the alleged harasser.

8. Action Against the Offender

If the Internal Committee (IC) concludes that the allegations against the offender have been substantiated, the matter will be considered a case of misconduct, and appropriate disciplinary action will be taken in accordance with the applicable service rules. The IC will recommend action to be taken, which may include one or more of the following:

- A written apology.

- A warning.
- Reprimand or censure.
- Termination of employment.
- Mandating counselling sessions or community service.
- Withholding of promotion, salary increases, or other benefits.

If any proceedings are initiated against an employee under this Policy, whether before or after In the event that the employee under investigation tenders their resignation, the Company reserves the right to reject the resignation and withhold the relieving of the employee until the completion of the proceedings.

Employees undergoing an inquiry for any disciplinary reason will not be considered for promotions, salary increments, growth plans, or other advancements. The incident and any action taken will be documented in the employee's personnel file. In the case of termination, the Company will not be obligated to pay the notice period benefits to the employee.

Relief to the Complainant During the Pendency of the Inquiry

At the written request of the complainant, the IC may recommend management the following actions:

1. **Transfer:** Transfer the complainant or the respondent to a different workplace.
2. **Leave:** Grant the complainant leaves for up to three months. This leave will be in addition to any other leave entitlements.
3. **Performance Review:** Restrict the respondent from assessing the complainant's work performance, preparing the complainant's confidential report, or assigning such tasks to another officer.

9. Punishment for False or Malicious Complaints and False Evidence

If the Internal Committee (IC) determines that the allegation against an employee is malicious or that the complainant knowingly filed a false complaint or produced forged or misleading documents, strict disciplinary action will be taken against the complainant in accordance with the Company's rules, policies, and procedures.

10. Confidentiality

The Company acknowledges that it is difficult for a victim to come forward with a complaint of sexual harassment and recognizes the importance of maintaining confidentiality. Therefore, all individuals with knowledge of the incident are required to maintain complete confidentiality under all circumstances.

11. Protection for the Complainant/Victim

The Company is committed to ensuring that employees who raise concerns of harassment are not subjected to any form of retaliation. Any act of retaliation will result in disciplinary action. The Company will take all necessary steps to ensure that the complainant and witnesses are not victimized or discriminated against during the handling of sexual harassment complaints.

12. Annual Report

The Internal Committee (IC) shall submit an Annual Report to the Employer and subsequently to the labor authorities each calendar year. The report will include the following details:

- The number of sexual harassment complaints received (applicable only to cases where the complainant is a woman) during the year.
- The number of complaints resolved during the year.
- The number of cases is pending for more than 90 days.
- The number of workshops or awareness programs conducted on sexual harassment.
- The nature of action taken by the employer and the labor authorities.

13. Penal Consequences and Appeal

If the Internal Committee (IC) concludes that the allegations have been substantiated, it will recommend to the Board of Directors the following actions:

- (a) Disciplinary action against the respondent for engaging in sexual harassment, in accordance with the Company's policies and applicable law; and/or
- (b) Deduction from the respondent's salary or wages of such an amount as deemed appropriate by the IC, to be paid to the complainant or their legal heirs.

The recommendations of the IC are binding, and the Company shall act on the IC's recommendations within 60 days of receipt, providing a report of the actions taken to the IC.

Disciplinary Action

The IC may recommend one or more of the following disciplinary actions to the Board:

- Issuing a written apology from the respondent to the complainant.
- Issuing an oral or written warning to the respondent.
- Reprimanding or censuring the respondent.
- Withholding the respondent's promotion.
- Withholding the respondent's salary increase or increments.
- Terminating the respondent's employment with the Company.
- Requiring the respondent to undergo counseling sessions.
- Requiring the respondent to carry out community service.
- Any other action in accordance with applicable misconduct regulations.

Deductions

If the Company is unable to deduct the specified sum from the respondent's salary due to their absence or cessation of employment/engagement, the IC may direct the respondent to pay the sum directly to the complainant. If the respondent fails to comply with this direction, the IC may issue an order for recovery of the amount as arrears of land revenue to the District Officer concerned.

To determine the amount to be paid to the complainant, the IC will consider the following factors:

- The mental trauma, pain, suffering, and emotional distress caused by the complainant.
- The loss of career opportunities due to the incident of sexual harassment.
- Any medical or health expenses incurred by the complainant for physical or

- psychiatric treatment.
- The income and financial status of the respondent.
- The feasibility of making the payment as a lump sum or in installments.

Upon the complainant's request, the Internal Committee (IC) will recommend to the Chief Executive Officer (CEO) provide necessary assistance, such as furnishing copies of written submissions, to the complainant for filing a complaint under any applicable laws.

It is essential to recognize that an act of sexual harassment may also constitute a criminal offense. Any person aggrieved by the recommendations made by the IC or by the non-implementation of such recommendations may file an appeal before the relevant appellate authority in accordance with the applicable laws.

14. Training

All employees will undergo training on the Prevention of Sexual Harassment once a year through an external agency. This training will also be incorporated into the employee induction program.

What Should I Do If I Think I Have Been Sexually Harassed or Am Part of a Hostile Environment?

If you believe you have been sexually harassed or are experiencing a hostile work environment, it is important to act promptly. The first step is to report the issue to the Internal Committee (IC). You can send an email to grievance@kvgggn.in with the subject line "Sexual Harassment." The Company cannot address an issue that has not been reported. Many individuals initially respond by ignoring or tolerating harassment, but this often leads to the situation worsening.

Here are the primary steps to address sexual harassment:

1. **Tell the Harasser to Stop:** Make it clear that the behavior is unwelcome. You can communicate this directly to the harasser or send a formal letter by registered mail. Be sure to keep copies of any written correspondence.
2. **Lodge a Complaint:** You can file a complaint with the Chairperson or any member of the IC. This can be done via email at grievance@kvgggn.in, which will remain confidential. If email is not accessible, you may send a registered letter, courier, or meet with the Chairperson in person. If you choose to inform your manager, ensure the complaint is routed to the Committee.
3. **Talk to Co-Workers:** Although it may be uncomfortable, consider discussing the situation with your co-workers. Exercise discretion to avoid encouraging gossip or further harm. You may find witnesses, allies, or other individuals who have had similar experiences with the harasser. Speaking to friends and family for support can also be beneficial.

Who are the responsibility holders in the IC? Who are the contact officers?

The Chairperson of the IC at KVGGN Synergy will be Vivek Sachan (Mail Id: VivekSachan@kvgggn.in and the Co-Chairperson will be Sonia (Mail id: Sonia@kvgggn.in)

The members of the Committee are:

The reconstituted IC consists of the following members:

- ❖ Mr. Arpit – Head HR of KVGGN Synergy: Chairperson of the Committee
- ❖ Mr. Kumar Sambasivan- General Counsel of KVGGN Synergy
- ❖ Mr. Kunal Kishore - MD & CEO of KVGGN Synergy
- ❖ Dr Janet Parameshwar – Non-Government Organization member of the Committee
- ❖ Ms. Vyas Sinha – Head of Legal, Eversource Capital-Nominee of Green Growth Equity Fund

Chairperson, Co- Chairperson and MD & CEO will receive the email sent in this regard.

A quorum of 3 members is required to be present for the proceedings to take place. The quorum shall include the Chairperson, (*this position can be substituted by the co- chairperson in the absence of the chairperson designated*) and at least two women members.

In case of any complaint, wherein the allegation is against any of the members of the Committee, such members shall be disqualified to attend such complaint redressal.

Redressal Process

1. Any employee who feels and is being sexually harassed directly or indirectly may submit a complaint of the alleged incident to any member of the Committee in writing with his/her signature within 15 days of occurrence of incident.
2. The Committee shall maintain a register to lodge the complaints received by it and keep the contents confidential, if it is so desired, except to use the same for discreet investigation.
3. The Committee shall hold a meeting with the Complainant within five days of receipt of the complaint, but no later than a week in any case.

4. At the first meeting, the Committee members shall hear the Complainant and record her/his allegations. The Complainant can also submit any corroborative material with documentary proof, oral or written material, to substantiate his/her complaint. If the Complainant does not wish to depose personally due to embarrassment of narration of event, a woman representative for woman employee/s involved and a male representative for male employee/s, involved shall meet and record the statement.
5. Thereafter, the person against whom a complaint is made may be called for hearing before the Committee and an opportunity will be given to him/her to give an explanation, where after, an enquiry shall be conducted and concluded with appropriate action/ counselling for both the parties.
6. In the event, the complaint does not fall under the purview of Sexual Harassment, or the complaint does not mean to be an offence of Sexual Harassment in the opinion of the Committee, the same shall be dropped after recording the reasons thereof. In case the complaint is found to be false, the Complainant shall, if deemed fit, be liable for appropriate disciplinary action by the Management.

What are my responsibilities as an employee?

All Employees are required to comply with the code of conduct of the Company and prohibit any kind of harassment. More specifically you are required to refrain from sexually oriented behavior while interacting with other Employees. It may be noted that the acts of teasing, sporadic abusive utterance, occasional sexually colored jokes, uninvited SMS and phone calls, could upset a person, even though it may not have been intentionally directed at him/her, and may not form a sexual harassment claim. If the censurable behavior you are engaging in is upsetting someone, stop it immediately and refrain from future indulgences in such behavior. Additionally, you are required to report all incidents of sexually oriented behavior that you are aware of, to the appropriate persons. Other actions which may result in hostile environment harassment, but are non-sexual in nature, must also be reported immediately to your supervisor, any member of management and/or to the IC.

Incidents of harassment include:

- Use of racially derogatory words, phrases, epithets
- Demonstrations of a racial or ethnic nature such as the use of gestures, pictures or drawings which would offend a particular racial or ethnic group
- Comments about an individual's skin color or other racial/ethnic characteristics
- Making disparaging remarks about an individual's gender that are not sexual in nature
- Negative comments about an employee's religious beliefs (or lack of religious beliefs)
- Expressing negative stereotypes regarding an employee's birthplace or ancestry
- Negative comments regarding an employee's age

- Derogatory or intimidating references to an employee's mental or physical impairment.

Every employee should be able to work without fear of violence or harassment, in a safe and healthy workplace. Violence and harassment in the workplace are not tolerated in KVGGN Synergy.

15. Dissemination of the Policy

A copy of this Policy shall be given to all employees and to all new recruits and they shall sign a statement acknowledging that they have received, read and understood the Policy.

16. Miscellaneous

The Company shall:

- (i) display at any conspicuous place in the workplace, the penal consequences of sexual harassments and the details of constitution of the IC.
- (ii) organize workshops and awareness programs at regular intervals for employees and orientation programs and seminars for members of the IC.
- (iii) provide necessary facilities and information to the IC for dealing with the complaint and conducting an inquiry.
- (iv) assist in securing the attendance of the respondent and the witnesses before the IC.
- (v) help the aggrieved employee if he/ she chooses to file a complaint in relation to the offence under the applicable law.
- (vi) cause to initiate action, under the applicable law, against the perpetrator, or if the aggrieved employee so desires, where the perpetrator is not an employee.
- (vii) monitor the timely submission of reports by the IC.