

AQUILA FINANCE LIMITED

POLICY ON PREVENTION OF SEXUAL HARASSMENT AT WORKPLACE

(In accordance with the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013)

AFL/POL/04/26-R005-04

History of the Document	Adopted by	Date of Adoption/Review
Originally Adopted	Board of Directors	02-03-2014
Review	Board of Directors	10-06-2023
Review	Board of Directors	27-04-2024
Review	Board of Directors	25-10-2025
Review	Board of Directors	01-04-2026

I. OBJECTIVE

The objective of this Policy is to ensure that all employees of Aquila Finance Limited work in an environment that is free from sexual harassment, intimidation, or any form of misconduct. The Company believes in promoting a safe, professional, and respectful workplace culture. This Policy aims to define the Company's position regarding sexual harassment, prevent its occurrence, and provide a mechanism for resolution and redressal of complaints.

II. SCOPE

This Policy applies to all employees of the Company, including permanent, temporary, contractual, trainees, interns, consultants, and any person engaged in the Company's business, whether directly or through an agency. The policy also extends to third parties such as clients, vendors, suppliers, and visitors associated with the Company.

The workplace includes:

1. All offices, branches, or premises where the Company conducts its business.
2. Any location visited by employees arising out of or during employment, including client sites, offsite meetings, and training programs.
3. Company-sponsored events, social gatherings, business trips, or any activity connected to official duties.
4. Virtual and digital communication platforms used for business purposes (emails, chat, video calls, etc.).

III. DEFINITION OF SEXUAL HARASSMENT

As defined under Section 2(n) of the Act, sexual harassment includes any one or more of the following unwelcome acts or behavior (whether directly or by implication):

- Physical contact and advances
- Demand or request for sexual favours
- Making sexually coloured remarks
- Showing pornography or sexually explicit material
- Any other unwelcome physical, verbal, or non-verbal conduct of sexual nature

The following circumstances, among others, if 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 employment;
- ii) Implied or explicit threat of detrimental treatment in employment;
- iii) Implied or explicit threat about present or future employment status;
- iv) Interference with work or creating an intimidating or hostile environment;
- v) Humiliating treatment likely to affect health or safety.

IV. RESPONSIBILITIES

Every employee shall maintain dignity, decorum, and mutual respect in the workplace. All employees are personally responsible for ensuring that their conduct is not in violation of this Policy. Managers and supervisors have an additional duty to ensure awareness and compliance within their teams.

V. INTERNAL COMPLAINTS COMMITTEE (ICC)

The Company has constituted an Internal Complaints Committee ('ICC') in accordance with Section 4 of the Act. The ICC shall function as an independent and impartial body responsible for receiving, investigating, and resolving complaints of sexual harassment.

Composition of ICC:

- Presiding Officer – A senior woman employee of the Company
- At least two employee members with experience in social work, HR, or legal matters
- One external member from an NGO or association committed to the cause of women or with experience in social/legal issues

The term of the ICC members shall be three years. The details of ICC members shall be displayed prominently in all office locations

VI. COMPLAINT MECHANISM AND PROCEDURE

A. Informal Resolution:

The aggrieved woman may communicate her disapproval directly to the harasser and request that the behaviour stop. If the matter is not resolved, or if the complainant feels uncomfortable doing so, she may approach the ICC for further assistance.

B. Formal Complaint:

- Any aggrieved woman may file a written complaint with the ICC within three months from the date of the incident or last occurrence.
- The ICC may extend this period by three additional months if justified in writing.
- The complaint may be submitted physically or electronically, addressed to the Presiding Officer.
- The ICC shall acknowledge receipt within seven working days.

VII. INQUIRY PROCESS

- The ICC shall send a copy of the complaint to the respondent within seven working days.
- The respondent shall submit a reply within ten working days along with supporting evidence or witnesses.
- The ICC shall conduct hearings, allowing both parties to present evidence.
- The inquiry shall be completed within 90 days, and the ICC shall submit a report with recommendations to the employer within 10 days of completion.

VIII. ACTION ON FINDINGS

If the ICC concludes that sexual harassment occurred, it may recommend any of the following disciplinary actions:

- Written apology
- Warning or censure
- Withholding promotion, increment, or training opportunities
- Suspension or termination of employment
- Counseling or community service as deemed appropriate

If the ICC finds the complaint to be false or malicious, it may recommend disciplinary action against the complainant. However, inability to prove allegations does not amount to malicious intent.

IX. CONFIDENTIALITY

All proceedings under this policy shall be kept strictly confidential. Disclosure of complaint details, identities of parties, or inquiry outcomes to the public, press, or media is prohibited, except as required by law.

X. RECORD KEEPING AND REPORTING

The ICC shall maintain detailed records of complaints received, inquiry proceedings, and actions taken. An annual report shall be submitted to the employer and the District Officer as required under the Act.

XI. AWARENESS AND TRAINING

The Company shall organize regular training sessions, workshops, and awareness programs for employees and ICC members to promote gender sensitization and awareness about rights and responsibilities under this policy.

XII. PROTECTION AGAINST RETALIATION

The Company strictly prohibits any form of retaliation or victimization against a complainant, witness, or ICC member. Any retaliation will be treated as a serious disciplinary offence.

XIII. POLICY REVIEW AND MODIFICATION

This Policy shall be reviewed periodically and may be amended by the Board of Directors to ensure compliance with applicable laws and evolving best practices. Any modification shall be approved at the Board level and published on the Company's website.

BY THE ORDER OF THE BOARD OF DIRECTORS

For AQUILA FINANCE LIMITED

