



**SHREM INFRA INVESTMENT MANAGER PRIVATE LIMITED**  
*(Formerly Known as Shrem Financial Private Limited)*

**PREVENTION  
OF  
SEXUAL HARASSMENT POLICY**

## PREVENTION OF SEXUAL HARASSMENT POLICY

### **1. INTRODUCTION:**

Shrem Infra Investment Manager Private Limited, being the investment manager (“**Investment Manager**”) of Shrem InvIT (“**InvIT**”) strives to create and maintain a work environment within the organization (the organization includes entities within the InvIT regime i.e. Investment Manager, Project Manager and road project SPVs), in which people are treated with dignity, decency, and respect. The environment of the organization should be characterized by mutual trust and the absence of intimidation, oppression, and exploitation.

This policy (the “**Policy**”) has been framed in accordance with the provisions of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, as amended and the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Rules, 2013 framed thereunder (hereinafter collectively referred to as the “**Act**”). Accordingly, while this Policy covers 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. In the event of any inconsistency or conflict between this Policy and the Act, or where any matter relating to sexual harassment is governed by the Act but not expressly addressed under this Policy, the provisions of the Act shall prevail.

This Policy provides protection against sexual harassment to women at the workplace, and sets out the mechanism for prevention, prohibition, and redressal of complaints of sexual harassment made by women, in accordance with the Act. Complaints of sexual harassment made by persons other than women shall be addressed in accordance with the Organization’s applicable internal disciplinary or conduct-related policies and shall not be treated as complaints under the Act.

The Investment Manager will not tolerate unlawful discrimination or harassment of any kind through enforcement of this policy and by education of employees, will seek to prevent, correct, and discipline the behaviour, which violates this policy.

All employees, regardless of their positions, are covered by and are expected to comply with this policy and are expected to respond appropriately to ensure that prohibited behaviour does not occur.

Appropriate disciplinary action will be taken against any employee who violates this policy. Based on the seriousness of the offense, disciplinary action may include verbal or written reprimand, suspension, or termination of employment.

Managers and supervisors who knowingly allow or tolerate discrimination, harassment, or retaliation, including the failure to immediately report such misconduct to human resources (HR), are in violation of this policy and are subject to discipline.

### **2. OBJECTIVES:**

The Objectives include the following:

- To develop and implement a policy against sexual harassment of women at the workplace;
- To uphold women’s right to protection against sexual harassment and the right to livelihood and towards that end for the prevention and redressal of sexual harassment of women at the workplace;
- To evolve a permanent mechanism for the prevention, prohibition and redressal of sexual harassment of women at the workplace;

- To actively promote a social, physical and psychological environment that will raise awareness about and deter acts of sexual harassment of women at the workplace;
- To ensure the implementation of the Act in its true letter and spirit by undertaking all necessary and reasonable steps including the constitution of appropriate committees for the purpose of gender securitization and to conduct enquiries into complaints of sexual harassment at the workplace; and
- To uphold the commitment of the InvIT to provide an environment free of discrimination and violence against women at the workplace.

### **3. ROLES AND RESPONSIBILITIES:**

The organization shall:

- Provide a safe, secure, and dignified working environment free from sexual harassment and treat sexual harassment as misconduct under applicable service rules, initiating appropriate disciplinary action where required.
- Constitute, support, and empower the Internal Committee (the “**IC**”) in accordance with the Act and provide all necessary facilities, information, and assistance for the effective discharge of its functions, including assistance in securing the attendance of the respondent and witnesses before the IC.
- Display at conspicuous places in the workplace the penal consequences of sexual harassment and the composition and contact details of the IC.
- Organize regular awareness, sensitization, and training programs for employees and specialized training for members of the IC to ensure effective implementation of this Policy and the Act.
- Ensure that no complainant, respondent, or witness is subjected to retaliation, intimidation, victimization, or any such adverse action during or after the inquiry process.
- Implement the recommendations of the IC within the timelines prescribed under the Act and communicate compliance to the IC accordingly.
- Monitor and ensure timely submission of reports by the IC, including the annual report to the District Officer, and maintain records and disclosures as required under applicable law.

### **4. PROHIBITED CONDUCT UNDER THIS POLICY:**

The Investment Manager, in compliance with all applicable federal, state, and local anti-discrimination and harassment laws and regulations, enforces this Policy in accordance with the following definitions and guidelines.

### **5. DISCRIMINATION:**

We value each and every employee working with us and we wish to protect their dignity and self-respect. In view of above, we have determined to promote a working environment in which persons of both genders complement each other as equals in an environment that encourages maximum productivity and to keep the personal dignity. It is a violation of the policy to discriminate in the provision of employment opportunities, benefits, or privileges; to create discriminatory work conditions; or to use discriminatory evaluative standards in employment if the basis of that discriminatory treatment is, in whole or in part, the person's race, colour, national origin, age, religion, disability status, sex, sexual orientation, gender identity or expression, genetic information or marital status.

The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 was enacted by the Ministry of Women and Child Development, India in 2013. The Government also subsequently notified the rules titled the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Rules, 2013 thereunder. The year 2013 also witnessed the promulgation of the Criminal Law (Amendment) Act, 2013 (“**Criminal Law Amendment Act**”) which has criminalized offences such as sexual harassment, stalking and voyeurism.

Discrimination in violation of this Policy will be subject to disciplinary measures up to and including termination.

#### **6. HARASSMENT:**

The Investment Manager prohibits harassment of any kind, including sexual harassment, and will take appropriate and immediate action in response to complaints or knowledge of violations of this policy. For purposes of this policy, harassment is any verbal or physical conduct designed to threaten, intimidate, or coerce an employee, co-worker, or any person working for or on behalf of the Investment Manager.

The following examples of harassment are intended to be guidelines and are not exclusive when determining whether there has been a violation of this policy:

- Verbal harassment including comments that are offensive or unwelcome regarding a person's national origin, race, colour, religion, age, sex, sexual orientation, pregnancy, appearance, disability, gender identity or expression, marital status, or other protected status, including epithets, slurs, and negative stereotyping.
- Nonverbal harassment including distribution, display or discussion of any written or graphic material that ridicules, denigrates, insults, belittles or shows hostility, aversion, or disrespect toward an individual or group because of national origin, race, colour, religion, age, gender, sexual orientation, pregnancy, appearance, disability, sexual orientation, marital status or other protected status.

#### **7. SEXUAL HARASSMENT:**

Sexual Harassment at the workplace results in violation of the fundamental rights of women, including the right to equality under Articles 14 and 15 of the Constitution of India, the right to life and to live with dignity under Article 21 of the Constitution, and the right to practice any profession or to carry on any occupation, trade or business which includes a right to a safe environment free from sexual harassment. Protection against sexual harassment and the right to work with dignity are universally recognised human rights by international conventions and instruments such as the Convention on the Elimination of all Forms of Discrimination against Women, which has been ratified on June 25, 1993 by the Government of India.

#### **8. OBJECTIVE:**

To create a work environment where safety and dignity of women employees is ensured and they are protected from sexual harassment as envisaged by Supreme Court of India Guidelines on Sexual Harassment, August 1997 and the Act.

## **9. SCOPE:**

The Policy intends to ensure that no woman employee is subjected to Sexual Harassment, and it is applicable to all employees of the Organization. This Policy applies to all categories of employees on contract at its workplace or at client sites whether permanent or temporary, probationary, or part-time or working as a consultant or on a voluntary basis or engaged through a contractor or agent.

Where Sexual Harassment occurs against any female employee because of an act by a third party or outsider while on official duty, The Investment Manager will take all necessary and reasonable steps as per the applicable rules and regulations, to initiate action at the workplace of the third party or outsider. This Policy shall be applicable to any allegation of Sexual Harassment at the Organization's premises including any place visited by an employee arising out of or during the course of employment and/or transportation provided by the Organization ("**Workplace**").

The workplace includes:

1. All offices or other premises where the Organization's business is conducted.
2. All organization-related activities performed at any other site away from the Organization's premises.
3. Any social, business, or other functions where the conduct or comments may have an adverse impact on the workplace or workplace relations.

## **10. DEFINITIONS:**

a) "Act" means The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Rules, 2013 and any amendment thereto.

b) "Aggrieved Woman" means any female Employee of the Investment Manager or any woman who alleges to have been subjected to any act of Sexual Harassment at the Workplace.

c) "Internal Committee" or "IC" means a committee by that name, constituted by the Board as per the provisions of the Act.

d) "Respondent" means the person against whom the allegation of Sexual Harassment has been made by the Aggrieved Woman.

e) "Sexual harassment" means and includes: -

1. such unwelcome behaviour of a male employee towards a female employee (whether directly or by implication) as:
  - physical contact and advances.
  - a demand or request for sexual favours.
  - sexually coloured remarks.
  - showing pornography.
  - any other unwelcome physical, verbal or non-verbal conduct of sexual nature."

2. Implied or explicit promise of preferential treatment to a woman employee in her employment; or
3. Implied or explicit threat of detrimental treatment to a woman employee in her employment; or
4. Implied or explicit threat to a woman employee about her present or future employment status; or
5. Interference with her work or creating an intimidating or offensive or hostile work environment for her; or
6. Humiliating treatment likely to affect her health or safety.

#### **11. INTERNAL COMMITTEE:**

The IC shall comprise of:

- a) A Presiding Officer who shall be a woman employed at a senior level at workplace from amongst the Employees.
- b) Not less than 2 (two) members from amongst employees preferably committed to the cause of women or who have had experience in social work or have legal knowledge; and
- c) One member from amongst non-governmental organization or associations committed to the cause of women or a person familiar with the issues relating to sexual harassment.

The IC will operate on the following guidelines: -

- a) The IC shall meet as and when any instance of violation of the policy is referred to the committee and, in any case, at least once in a year.
- b) The IC shall prepare the annual report and submit a report having the following details to the employer and the District Officer:
  - number of complaints of sexual harassment received in the year;
  - number of complaints disposed off during the year;
  - number of cases pending for more than ninety days;
  - number of workshops or awareness programme against sexual harassment carried out;
  - nature of action taken by the employer or District Officer.
- c) The Presiding Officer and the members of the IC will hold the position up to three years from the date of their nomination.

#### **12. FUNCTIONING OF THE IC:**

##### **A. Lodging a Complaint:**

- a) The Aggrieved Woman may make a written complaint directly to the Presiding Officer of the IC, within three months from the date of the incident and in case of a series of incidents, within a period of three months from the date of last incident. In case the complaint cannot be made in writing, the IC shall render all reasonable assistance to the woman for making the complaint in writing.
- b) Where an Aggrieved Woman is unable to make a complaint on account of her physical incapacity, a complaint may be filed by (i) her legal heir, (ii) her relative or friend, or (iii) her co-

worker, (iv) an officer of the National or State Commission for Women, or (v) any person who has knowledge of the incident, with the written consent of the Aggrieved Women.

c) Where an Aggrieved Women is unable to make a complaint on account of her mental incapacity, a complaint may be filed by (i) her legal heir, (ii) her relative or friend, or (iii) a special educator, or (iv) a qualified psychiatrist or psychologist, (v) the guardian, or (vi) any person who has knowledge of the incident jointly with any of the persons mentioned in (i) to (v) of this paragraph.

d) Where an Aggrieved Women, for any other reason, is unable to make a complaint, a complaint may be filed by her legal heir, any person who has knowledge of the incident, with the written consent of the Aggrieved Women.

e) The IC may, for the reasons to be recorded in writing, extend the time limit, if it is satisfied that there were unavoidable circumstances which prevented the Aggrieved Woman from filing a complaint within the said period. Such complaint shall contain all the material and relevant details concerning the alleged Sexual Harassment including the name of the contravener. The information disclosed by such complainant should be treated as confidential information by the members of the IC.

f) If the Aggrieved Woman would like to initiate action under the Bharatiya Nyay Sanhita, 2023 (“BNS”), she may inform the management, and the management will provide necessary assistance to the Aggrieved Woman to file the complaint in relation to the offence under the BNS.

#### **B. Conciliation:**

The IC may, before initiating an inquiry, at the request of the complainant take steps to settle the matter between her and the Respondent through conciliation. However, no monetary settlement shall be made the basis of the conciliation.

Where a settlement has been arrived as mentioned above, the IC shall record the settlement so arrived at and forward the same to the management to take action as specified in the recommendation and shall provide copies of the settlement to the complainant and the Respondent.

#### **C. Interim Reliefs:**

During pendency of the inquiry, on a written request made by the complainant, the IC may, subject to applicable law, 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 the complainant’s work performance.
- Grant such other relief as may be appropriate.

Once the recommendations of interim relief are implemented, the same is informed to the IC.

#### **D. Inquiry into Complaint:**

The IC shall proceed to make inquiry into the complaint in accordance with the provisions of the service rules applicable. Such an inquiry (with due conciliation as appropriate) shall be completed within a period of three months. Confidentiality of the complaint procedure will be maintained. The IC shall proceed to make an inquiry into the complaint in accordance with the principles of natural justice and further during the course of inquiry provide an opportunity of being heard to

the complainant and the Respondent and the relevant witnesses provided by the complainant and the Respondent.

**E. Inquiry Report:**

On the completion of such inquiry, the IC shall provide the report of its findings to the Chairman within a period of 10 days from the date of completion of enquiry and such report be made available to the concerned parties. The Managing Director & CEO shall act upon the recommendation within 60 days of its receipt. In the event that the IC arrives at the conclusion that there is no case for Sexual Harassment, then the complaint may be dropped by the IC, and it shall notify the management of the same.

**F. Appeal:**

Any party not satisfied or further aggrieved by the implementation or non-implementation of recommendations made, may appeal to the court / tribunal, being the appellate authority in accordance with the Act, within 90 days of the recommendations being communicated.

**13. PENALTIES TO RESPONDENT:**

If the sexual harassment complaint is proved prima-facie right to the IC based on the material and/or witness verified by them, then the IC will recommend to the Chairman of the Board, punishment to the Respondent in terms of:

- Warning in writing
- Deduct from the salary or wages of the Respondent such sum as it may consider appropriate to be paid to the aggrieved woman or to her legal heirs, as it may determine
- Immediate suspension from the services
- Immediate termination
- May immediately refer the case based on the gravity and merits of the case to the local police/judiciary

**14. PUNISHMENT FOR FALSE COMPLAINTS:**

Where, during or after the inquiry, the IC arrives at the conclusion that the allegation against the Respondent is either malicious or that the aggrieved woman or any other person making the complaint on her behalf in accordance with the Act has made the complaint knowing it to be false or the aggrieved woman or any other person making the complaint on her behalf in accordance with the Act has produced any forged or misleading document, it may recommend to the employer to take appropriate punitive action against the woman or the person making the complaint.

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

**15. SANCTIONS AND DISCIPLINARY MEASURES:**

Anyone who has been found to have sexually harassed another person under the terms of this policy is liable to any of the following sanctions:

- verbal or written warning
- adverse performance evaluation
- reduction in wages/ Salary

- transfer
- demotion
- suspension
- dismissal

The nature of the sanctions will depend on the gravity and extent of the harassment. Suitable deterrent sanctions will be applied to ensure that incidents of sexual harassment are not treated as trivial. Certain serious cases, including physical violence, will result in the immediate dismissal of the harasser

**16. CONFIDENTIALITY:**

Notwithstanding anything contained in the Right to Information Act, 2005, contents of the complaint, the identity and addresses of the Aggrieved Woman, Respondent and witnesses, any information relating to conciliation and inquiry proceedings, recommendations of the IC and the action taken by them shall not be published, communicated, or made known to the public, press and proceedings media in any manner.

**17. THE MANAGEMENT ASSURANCE:**

We at the Organization are committed towards giving every employee a just and fair hearing on issues encountered by them at the workplace with special attention to sexual harassment. The Investment Manager will take very serious disciplinary action against any victimization of the employee who is complaining or the alleged harasser that may result from a complaint.

In conclusion, the Investment Manager and the management reiterate its commitment to providing its women employees, a workplace free from harassment/ discrimination and where every employee is treated with dignity and respect.

**18. POLICY REVIEW**

The Authorized Person may review the Policy from time to time. Any material changes to the Policy will need the approval of the board of directors of the Investment Manager of the InvIT.

**19. CONFLICT WITH APPLICABLE LAW:**

The Policy shall not contradict the provisions of any applicable law. In case of any discrepancy, the provisions of applicable law shall prevail over the provisions of this Policy.

Notwithstanding the above, this Policy will stand amended to the extent of any change in applicable law, including any amendment to the Securities and Exchange Board of India (Infrastructure Investment Trusts) Regulations, 2014, as amended, without any action from the Investment Manager or approval of the unitholders of the InvIT.

Initially adopted by the board of directors of Shrem Infra Investment Manager Private Limited on October 17, 2022 and last amended on February 5, 2026.

\*\*\*\*\*