



Unico Housing Finance Private Limited

Prevention of Sexual Harassment

(POSH) Policy

PREVENTION OF SEXUAL HARASSMENT (POSH) POLICY

Policy Number: UNICO /HR/001

Prepared and Proposed By	Human Resources
Reviewed and Recommended By	Internal Complaints Committee
Approved By	Board of Directors
Date of Approval	30 th October 2025
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Effective Date	30 th October 2025
Review Cycle	Reviewed on an annual basis or earlier based on the statutory amendments

Purpose

The primary purpose of a POSH policy is to prevent and eliminate sexual harassment in the workplace. It aims to create a safe and respectful working environment for all employees.

It helps the organization comply with legal requirements related to sexual harassment, as many countries have laws mandating the implementation of such policies.

Scope

A POSH policy can contribute to a positive workplace culture where employees feel valued, respected, and can perform their job without fear of harassment.

It serves to protect the rights and dignity of employees, ensuring they have recourse if they experience or witness sexual harassment.

Applies To

All the employees, Customers, Vendors of Unico Housing Finance Private Limited.

Version Control

Version Number	Date of Version	Approved by
1.0	6 th November 2023	Board of Directors
2.0	30 th October 2025	Board of Directors

UNICO HOUSING FINANCE PRIVATE LIMITED

Regd Office : The Oval, 8th Floor, No.10 & 12, Venkatanarayana Road, T.Nagar, Chennai - 600017

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Contents

Objective	3
Definitions	3
Prohibition of Sexual Harassment	4
Internal Complaints Committee	5
What is the role of IC at Unico?	5
Guidelines for the IC	5
Filing a Complaint	6
Resolution Through Formal Inquiry	6
Inquiry Process	7
Conciliation	7
Action Post Inquiry	8
Malicious Allegation	8
Appeal	9
Confidentiality & Protection Against Victimization	9
Our Role as an Employee & a Co-worker	9
Our Role as a Manager	9
Frequency of Review of Policy	10

Objective

To provide a safe and respectful work environment for all employees that is free from harassment or discrimination against employees on the basis of race, colour, creed, religion, sexual orientation or gender identity, or physical or mental disability and to promote gender sensitive safe spaces.

Definitions

"Act" means the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (14 of 2013).

"UHFPL" means Unico Housing Finance Private Limited

"Audit Committee" - means the Committee constituted by the Board of Directors of the Company in accordance with Section 177 of the Companies Act, 2013

"Employee" means every employee including the Directors in the employment of the Company.

"Complainant" - a person who is subject to alleged sexual harassment.

"Respondent" - a person whose alleged conduct is the subject of a complaint.

"Inquiry Committee" - the Committee constituted by the Presiding Officer of the members of the Internal Committee.

Workplace - Workplace includes:

- All offices or other premises where the Company's business is conducted.
- Any other site away from the Company's premises where company-related activities will be performed
- Any social, business or other functions where the conduct or comments may have an adverse impact on the workplace or workplace relations.
- Any place visited by the employee arising out of or during the course of employment including transportation provided by the employer for undertaking such a journey.

Employee: This policy applies to all categories of employees of the Company, including any person employed at Company name on regular, temporary, ad hoc or daily wage basis, either directly or through an agent, including a contractor, with/ without the knowledge of the principal employer, whether for remuneration or not, or working on a voluntary basis or otherwise, whether the terms of employment are express or implied and includes a co-worker, a contract worker, probationer, trainee, apprentice or called by any other such name, at the workplace or at client sites.

Sexual Harassment

Sexual harassment is defined under 'The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013' ("the Act"), according to which Sexual Harassment includes any unwelcome acts or behavior (whether directly or by implication) such as:

- i) Physical contact and advances
- ii) Demand or request for sexual favours
- iii) Making Sexually coloured remarks
- iv) Showing / Display of pornography
- v) Any other unwelcome physical, verbal or non-verbal conduct of a sexual nature

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:

- Implied or explicit promise of preferential treatment in employment; or
- Implied or explicit threat of detrimental treatment in employment; or
- Implied or explicit threat about present or future employment status; or
- Interference with work or creating an intimidating or offensive or hostile work environment for the person concerned.
- Humiliating treatment likely to affect health or safety.

Examples of harassing behaviour may include unwanted physical contact, foul language of an offensive sexual nature, sexual propositions, sexual jokes or remarks, obscene gestures, and displays of pornographic or sexually explicit pictures, drawings, or caricatures. Use of the employer's or employees own computer system or any electronic or digital device for the purpose of viewing, displaying, or disseminating material that is offensive in nature may also constitute harassing behaviour.

Examples of Unacceptable Behaviour

- Turning work discussions to sexual topics.
- Making personal comments about a person's clothing, body or looks.
- Probing too much about a person's personal life.
- Giving unsolicited advice on looks and physical appearance.
- Staring at someone and making them uncomfortable.
- Standing closer than appropriate or necessary for the work being done.
- Making blank or unsolicited calls or sending unnecessary messages in spite of repeated warnings.
- Trying to make physical contact (like touching) unnecessarily.
- Secretly taking photographs of women colleagues.

Prohibition of Sexual Harassment

- Sexual Harassment by any Employee of the Company is strictly prohibited. Sexual Harassment of an individual violates such individual's fundamental rights to gender equality, to life and liberty and also in violation of the victim's right to practice any profession or to carry out any occupation, trade or business and to work with human dignity, and is further in clear conflict with the Company's commitment and policies to create and maintain a work environment that is free from all such unlawful and discriminatory actions.
- Sexual Harassment of an employee shall constitute "Misconduct" in terms of the Company's Service rules, regulations and relevant policies. Any Employee found guilty of committing an act(s) of Sexual harassment shall be subjected to disciplinary action as per the company policy.
- It may be noted that all Employees of the Company are prohibited from indulging in any unwelcome overtures or sexually determined behaviour or conduct and that any such behaviour or conduct, if found at the end of any investigation conducted in terms of this Policy amounts to sexual harassment as defined above, and would, depending on the facts and circumstances, be treated as violation of this policy and will be dealt with as a misconduct under the Service rules, regulations and relevant policies of the Company. The inquiry proceedings shall be in English, being the official language of the Company.

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➤ It is further clarified that the making of any patently false or malicious allegation(s) about Sexual Harassment by any Employee(s) of the Company towards another Employee(s) within the Company or against any third party by producing any forged or misleading document would also constitute "Misconduct" and shall be liable to disciplinary proceedings and penalties in accordance with this Policy and the applicable "Standard of Conduct, Code of Ethics & Compliance Handling" of the Company.

Internal Complaints Committee

As per the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act 2013, it is mandatory for every organization to have an Internal Complaints Committee as a mechanism for redressal of sexual harassment complaints.

Unico has an INTERNAL COMPLAINTS COMMITTEE for Prevention of Sexual Harassment at Workplace. Following members constitute the committee:

1. Ms. Deepa Murali - Chairperson
2. Ms. Kurunji Michael - External Member
3. Mr. N Srinivasan - Member
4. Ms. Lakshmi Raghupathy - Member

What is the role of IC at Unico?

The Committee will be responsible for

- Creating awareness on the rights of employees against sexual harassment
- Preventing sexual harassment at the workplace
- Receiving complaints of sexual harassment at the workplace
- Initiating and conducting inquiry as per the established procedure
- Submitting findings and recommendations of inquiries
- Coordinating with the employer in implementing appropriate action
- Maintaining strict confidentiality throughout the process as per established guidelines

Submitting annual reports in the prescribed format

Guidelines for the IC

➤ The Internal Complaints Committee will comprise of the following members out of which at least 2 members will be women:

- ✓ Presiding officer (woman at senior level)
- ✓ One member from amongst the non-governmental organisations (NGOs) or associations committed to the cause of women or familiar with the issues relating to sexual harassment.
- ✓ Not less than 2 members from amongst employees preferably committed to the cause of women or who have had experience in social work or have legal knowledge.

➤ The meetings of the Committee will require 3 members to be present, including one lady member.

➤ Any vacancy caused among the Committee members, shall be filled by fresh appointments or as mutually decided by other members to fulfil the requirements of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013' ("the Act").

- The Presiding Officer and every member of the Committee shall hold office not exceeding 3 years, from the date of their nomination. The HR shall facilitate suitable replacement of the members in the Committee under intimation to management.

The Committee may appoint an enquiry officer to investigate any complaint received from an employee and enquiry officer may be member(s) of the Committee, senior employee(s) or external person(s) who is part of the IC.

Filing a Complaint

Where / How to Complain?

Write a mail to POSH@Unicohfc.com

OR

written complaint handed over to the President of the IC

OR

Complaint to members of the Internal Committee through phone or email

- Any Employee who has experienced or has been subjected to any act of Sexual Harassment (the "Complainant") at the workplace or who has witnessed such incident, shall be entitled to lodge a complaint.
- In case of a verbal complaint, the complaint will be reduced in writing by the receiver of the complaint and signatures of the complainant will be obtained. The complaint can be sent through e-mail from their official email ID, registered and/or ordinary mail, courier, personal appearance or written complaint handed over to the President of the IC.
- 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 employee for making the complaint in writing.
- If the complainant is unable to lodge the complaint on account of her incapacity, the following may do so on her behalf, with her written consent:
 - a) Legal heir, relative or friend
 - b) Co-worker
 - 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.
- The complaint must be lodged within 3 months from the date of incident/ last incident in case of multiple such incidences. Provided further that the Internal Committee or, as the case may be, the Local Committee may, for the reasons to be recorded in writing, extend the time limit not exceeding three months, if it is satisfied that the circumstances were such which prevented the woman from filing a complaint within the said period.
- If the initial complaint is made to a person other than a committee member, upon receiving such a complaint, it will be the responsibility of the complaint receiver to report the same to the committee immediately.

Resolution Through Formal Inquiry

- The Committee will meet within 7 (seven) working days from receipt of the complaint. The Complainant or his/ her representative shall be heard at this meeting, and the Committee shall

record the facts based on such hearing. If the IC is satisfied that there does not exist any *prima facie* case of Sexual harassment it shall, after recording its reasons in writing send a report to the Managing Director & CEO with a recommendation that no action is required to be taken in the said complaint.

- In the event the Committee finds a *prima facie* case of Sexual harassment allegedly committed by one or more Employees (the "Respondent"), it shall conduct a detailed investigation of the complaint received.

The investigations shall be completed within 3 months from the date of receipt of the complaint and the IC shall recommend to the Managing Director & CEO after recording its reasons in writing to take action against the Respondent for Sexual Harassment as a misconduct in accordance with the provisions of Service Rules and relevant policies of the Company including written apology, warning, reprimand, censure, withholding of promotion, withholding of pay increase, termination of employment from the Company or undergoing a counselling session or any other appropriate action.

Inquiry Process

- Upon receipt of the complaint, the committee should send communication of the complaint to respondent within 7 working days.

Conciliation

- Before initiating an inquiry and at the request of the Complainant, the IC may take steps to settle the matter between him/her and the respondent through conciliation, provided that no monetary settlement shall be made on the basis of conciliation.
- If a settlement has been arrived at, the IC needs to record the settlement and forward the same to the employer to act as specified in the recommendation.
- The IC needs to provide copies of the settlement, as recorded, to the Complainant and the respondent.
- Where a settlement has been arrived at, no further inquiry needs to be conducted by the IC.
- However, in the event no conciliation is requested for by the Complainant, or no settlement has been arrived at between the parties, and / or if the Complainant informs the IC that any term or condition of the Settlement arrived at earlier has not been complied with, then, the IC, in the above situations, needs to proceed to inquire into the complaint.
- Respondent should reply with all supporting evidence / documents within 10 working days of receiving the copy of the complaint.
- Upon receipt of the response from the Respondent, the Inquiry Committee shall conduct a hearing where both the Complainant and the Respondent shall be heard in person.
- The IC shall have the right to terminate the inquiry proceedings or to give an *ex parte* decision on the complaint, if the complainant or respondent fails, without sufficient cause, to present herself or himself for three consecutive hearings convened by the Chairperson or Presiding Officer, as the case may be.
- Provided that such termination or *ex parte* order may not be passed without giving a notice in writing, fifteen days in advance, to the party concerned.
- No external legal practitioner can represent any party at any stage of the inquiry procedure.

- The Internal Committee shall 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 shall be present.
- All proceedings of the inquiry should be documented. The Committee shall interview the respondent separately and impartially. Committee should state exactly what the allegation is and who has made the allegation. The respondent should be given full opportunity to respond and provide any evidence etc. Detailed notes of the meetings should be prepared which may be shared with the respondent and complainant upon request. Any witnesses produced by the respondent should be interviewed & statements should be taken.
- If the complainant or respondent desires to cross examine any witnesses, the Committee should facilitate the same and record the statements.
- In case complainant or respondent seeks to ask questions to the other party, they may give them to the Committee which shall ask them and record the statement of the other party.
- Any such inquiry shall be 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. All Employees shall extend their fullest co-operation to the Inquiry Committee and any failure to co-operate, or the giving of wrong or misleading information, or withholding information shall be a violation of this Policy and they shall be dealt with appropriate actions by the President of the IC and the employer.

Action Post Inquiry

Post the inquiry the committee will submit its report containing the findings and recommendations to the Managing Director & CEO within 10 days of completion of the inquiry. The findings and recommendations should be reached from the facts established and must be recorded accurately.

➤ **Complaint Unsubstantiated**

Where the committee arrives at the conclusion that the allegation against the respondent has not been proved, it shall recommend to the Managing Director & CEO that no action is required to be taken in this matter.

➤ **Complaints Substantiated**

Where the committee arrives at the conclusion that the allegation against the respondent has been proved, it shall recommend to the Managing Director & CEO among the following:

- To take necessary action for sexual harassment as a misconduct, in accordance with the applicable employee service rules.

Malicious Allegation

Where the committee arrives at the conclusion that the allegation against the respondent is malicious or the complainant or any other person making the complaint has made the complaint knowing it to be false or the complainant 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 person making the complaint, in accordance with the provisions of the service rules applicable to her or him or where no such service rules exist, in such manner as may be prescribed Sexual Harassment of Women at Workplace (Prevention, Prohibition & Redressal) Rules 2013 ("Rules").

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.

Appeal

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

Confidentiality & Protection Against Victimization

- Notwithstanding anything contained in the Right to Information Act 2005, the contents of the complaint made, the identity and address of the aggrieved employee, respondent and witness, any information relating to conciliation and inquiry proceedings, recommendations of the IC, and the action taken by the employer under the provisions of the Act shall not be published, communicated or made known to the public, press and media in any manner.
- Provided that information may be disseminated regarding the justice secured to any victim of sexual harassment under this Act without disclosing the name, address, identity or any other particulars calculated to lead to the identification of the aggrieved employee and witnesses.
- Where any person entrusted with the duty to handle or deal with the complaint, inquiry or any recommendations or action to be taken under the provisions of the Act, contravenes the above, he shall be liable for penalty in accordance with the provisions of the service rules applicable to the said person or where no such service rules exist, in such manner as may be prescribed in the Rules.

UNICO FOLLOWS THE POLICY OF ZERO TOLERANCE AGAINST SEXUAL HARASSMENT OF EMPLOYEES AT WORKPLACE AND ALSO AGAINST THOSE WHO FILE FALSE COMPLAINTS.

Our Role as an Employee & a Co-worker

It is the responsibility of every individual and the responsibility of an organisation to promote a safe working environment:

- Treat all your colleagues with respect, dignity and care.
- If you are subjected to any kind of harassment, report it immediately.
- If the complainant is not able to write the incident in English, the same could be written in vernacular language, scanned and sent through mail.
- If you are a co-worker who is a witness, try to keep records. Write down the date, time, place, and names of others who witnessed the harassment.
- Help the victim to report it in the forum concerned.

Our Role as a Manager

As a supervisor, do not ignore or be indifferent to the complaint.

- Do not get biased if the complaint is against one of the 'performing' team members.
- It is your responsibility to ensure the complaint is immediately brought to the notice of the IC.
REMEMBER THAT EARLY DETECTION AND ACTION CAN RESULT IN LESSER MENTAL AND PHYSICAL AGONY TO BOTH THE PARTIES CONCERNED

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