



UV Asset Reconstruction Company Limited (UVARCL)

Policy on Sexual Harassment at Workplace

** Reviewed by the Board of Directors in its meeting held on July 18, 2026.*

POLICY ON SEXUAL HARASSMENT AT WORKPLACE

1. INTRODUCTION

1.1 Our Company is committed to provide a work environment that ensures every employee is treated with dignity and respect and afforded equitable treatment. We strive to create a guard against such violations which impinge upon the fundamental and human rights of each employee. The Company is also committed towards promoting a work environment that is conducive to the professional growth of its employees and encourages equality of opportunity. The Company will not tolerate any form of sexual harassment and is committed to take all necessary steps to ensure that its employees are not subjected to any form of harassment.

1.2 In accordance with the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, our company has made this policy for Prevention of Sexual Harassment at the Workplace.

2. OBJECTIVES

2.1 To maintain a working environment that is comfortable and free of sexual harassment.

2.2 Right to work with dignity and respect and create a healthy understanding amongst the employees to promote amicable relations between them.

2.3 Helping employees communicate any such actions to the Company for taking appropriate actions.

3. DEFINITIONS

3.1 “Aggrieved”

In relation to workplace, a person of any age whether employed or not, who alleges to have been subjected to any act of sexual harassment by the Respondent.

3.2 “Employee”

Means a person employed at a workplace for any work on regular, temporary, ad hoc or daily wage basis, either directly or through an agent, including a contractor, with or 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;

3.3 "Employer"

Means: (i) in relation to any department, organization, undertaking, Establishment, enterprise, institution, office, branch or unit of the appropriate Government or a local authority, the head of the department, organization, undertaking, establishment. Enterprise, institution, office, branch or unit or such other officer as the appropriate Government or the local authority, as the case may be, may by an order specify in this behalf;

{ii) in any workplace not covered under sub-clause (i), any person responsible for the management, supervision and control of the workplace.

Explanation. -- For the purposes of this sub-clause "management" includes the person or board or committee responsible for formulation and administration of policies for such organization:

iii) In relation to work place covered under sub-clauses (i) and (ii) the person discharging the contractual obligation with respect to his or her employees.

(iv) In relation to a dwelling place or a house, a person or a household who employ or benefits from the employments of domestic worker, irrespective of a number, Time period, or type of such worker employed, or the nature of the employment or activities performed by the domestic worker.

3.4 "Respondent"

Against whom the aggrieved has made a complaint.

3.5 "Sexual Harassment"

Includes any one or more of the following unwelcome acts or behavior (whether directly or by implication) namely: -

- i. physical contact and advances; or
- ii. a demand or request for sexual favors; or
- iii. making sexually colored remarks; or
- iv. showing pornography; or
- v. any other unwelcome physical, verbal or non-verbal conduct of sexual nature

3.6 “Unwelcome Sexually Determined Behavior”

Includes but is not limited to: -

Subjecting another person to an unwelcome act of physical intimacy including grabbing, brushing, touching, including sexual flirtations, advances or propositions.

Making any unwelcome remark with sexual connotations like sexually explicit, remarks, cracking jokes or using sentences with sexual connotations or making sexist remarks, etc.

Showing any sexually explicit visual material in the form of pictures / cartoons / pin-ups / calendars / screen-savers on computers / any offensive written or electronic material.

Engaging in any other unwelcome conduct of a sexual nature, verbal or even nonverbal, etc.

Sending unwelcome communication of a sexual nature, through e-mail, letter, mobile technology or any other form of written or electronic communication, exhibiting conduct of a sexual nature.

3.7 “Workplace” includes

- i. any department, organization, undertaking, establishment, enterprise, institution, office, branch or unit which is established, owned, controlled or wholly or substantially financed by funds provided directly or indirectly by the appropriate Government or the local authority or a government company or a corporation or a co-operative society;
- ii. any private sector organization or a private venture, undertaking, enterprise, institution, establishment, society, trust, non-governmental organisation, unit or service provider carrying on commercial, professional, vocational, educational, entertainment, industrial, health services or financial activities including production, supply, sale, distribution or service;
- iii. hospitals or nursing homes;
- iv. any sports institute, stadium, sports complex or competition or games venue. whether residential or not used for training, sports or other activities relating thereto
- v. any place visited by the employee arising out of or during the course of employment including transportation provided by the employer for undertaking such journey
- vi. a dwelling place or a house

4. RESPONSIBILITIES REGARDING SEXUAL HARASSMENT:

All employees of the Company have a personal responsibility to ensure that their behavior is not contrary to this policy. All employees are encouraged to reinforce the maintenance of a work environment free from sexual harassment.

5. REDRESSAL PROCEDURE

5.1 Complaints Committee

The Company has instituted a Complaints Committee for redressal of sexual harassment complaint (made by the victim) and for ensuring time bound treatment of such complaints. Initially, and till further notice, the Complaints Committee will comprise of the following four members out of which at least one –half of the total members shall be women:

- i. A Presiding officer who shall be woman employed at a senior level at workplace from amongst the employees:

Provided that in case a senior level woman employee is not available, the presiding officer shall be nominated from other offices or administrative units of the workplace.

Provided further that in case the other offices or administrative units of the workplace do not have a senior level woman employee, the Presiding Officer shall be nominated from any other workplace of the employer or other department or organization.

- ii. A member from an NGO or Lawyer (Member)
- iii. Not less than two members from amongst employees preferably committed to the cause of women or who have had experience in social work or have legal knowledge.

The Complaints Committee is responsible for:

- i. Investigating every formal written complaint of sexual harassment
- ii. Taking appropriate remedial measures to respond to any substantiated allegations of sexual harassment
- iii. Discouraging and preventing employment-related sexual harassment

Note: - On approval, we will be informing about this policy to all our Employees.

The Presiding Officer and every member of the Internal Committee shall hold office for such period, not exceeding three years, from the date of their nomination as may be specified by employer.

6. PROCEDURES FOR RESOLUTION, SETTLEMENT OR PROSECUTION OF ACTS OF SEXUAL HARASSMENT:

The Company is committed to providing a supportive environment to resolve concerns of sexual harassment as under:

6.1 Informal Resolution Options:

If an incident of sexual harassment occurs, the victim of such conduct can communicate their disapproval and objections immediately to the harasser and request the harasser to behave decently. If the harassment does not stop or if the victim is not comfortable with addressing the harasser directly, the victim can bring their concern to the attention of the Complaints Committee for redressal of their grievances. The Complaints Committee will thereafter provide advice or extend support as requested and will undertake prompt investigation to resolve the matter.

6.2 Complaints:

6.2.1. An employee with a harassment concern, who is not comfortable with the informal resolution options or has exhausted such options, may make a formal complaint to the Presiding Officer of the Complaints Committee. The complaint shall have to be in writing and can be in form of a letter, preferably within 15 days from the date of occurrence of the alleged incident. Alternately, the employee can send complaint through an email to the presiding officer on email id pallavi@uvarcl.com. The employee is required to disclose their name, department, division, mobile number and location they are working in, to enable the Presiding Officer to contact them and take the matter forward.

6.2.2. The Presiding Officer of the Complaints Committee will proceed to determine whether the allegations (assuming them to be true only for the purpose of this determination) made in the complaint fall under the purview of Sexual Harassment, preferably within 30 days from receipt of the complaint. In the event, the allegation does not fall under the purview of Sexual Harassment or the allegation does not constitute an offence of Sexual Harassment, the Presiding Officer will record this finding with reasons and communicate the same to the complainant.

6.2.3. If the Presiding Officer of the Complaints Committee determines that the allegations constitute an act of sexual harassment, he will proceed to investigate

the allegation with the assistance of the Complaints Committee.

- 6.2.4.** Where such conduct, on the part of the accused, amounts to a specific offence under the law, the Company shall initiate appropriate action in accordance with law by making a complaint with the appropriate authority.
- 6.2.5.** The Complaints Committee shall conduct such investigations in a timely manner and a written report containing the findings and recommendations will be prepared as soon as practically possible and, in any case, not later than 90 days from the date of receipt of the complaint and also ensure corrective action as per the recommendations. Complaints Committee also keep the complainant informed of the same.
- 6.2.6.** Corrective action may include any of the following:
 - a. Formal apology
 - b. Counseling
 - c. Written warning to the perpetrator and a copy of it maintained in the employee's file.
 - d. Change of work assignment / transfer for either the perpetrator or the victim.
 - e. Suspension or termination of services of the employee found guilty of the offence

6.3 Punishment for False and Malicious Complaints:

Where the Committee arrives at a conclusion that the allegation against the respondent is false or malicious or any person making or defending the complaint, or as a witness, has produced any forged or misleading document, the Complaint Committee shall take Disciplinary action against the person who has made the complaint.

7. CONFIDENTIALITY:

The Company understands that it is difficult for the victim to come forward with a complaint of sexual harassment and recognizes the victim's interest in keeping the matter confidential. To protect the interests of the victim, the accused person and others who may report incidents of sexual harassment, confidentiality will be maintained throughout the investigatory process to the extent practicable and appropriate under the circumstances.

8. ACCESS TO REPORTS AND DOCUMENTS:

All records of complaints, including contents of meetings, results of investigations and other relevant material will be kept confidential by the Company except where disclosure is required under disciplinary or other remedial processes.

9. PROTECTION TO COMPLAINANT / VICTIM:

The Company is committed to ensure that no employee who brings forward a harassment concern is subject to any form of reprisal. Any reprisal will be subject to disciplinary action. The Company will ensure that the victim or witnesses are not victimized or discriminated against while dealing with complaints of sexual harassment. However, anyone who abuses the procedure (for example, by maliciously putting an allegation knowing it to be untrue) will be subject to disciplinary action.

10. CRIMINAL PROCEEDINGS

Where such conduct amounts to a specific offence under the Indian Penal Code or under any other law, the Management shall support appropriate action in accordance with law if the complainant wishes to initiate the same.

11. CONCLUSION

In conclusion, the Company reiterates its commitment to providing its employees with a workplace free from harassment/ discrimination and where every employee is treated with dignity and respect.

12. REVIEW AND AMENDMENTS

This Policy shall be reviewed annually by the Board of Directors or as and when required. Any subsequent amendment/modification in the Act/or other applicable laws in this regard shall automatically apply to this policy.