

Policy Title	Policy on Prevention, Prohibition and Redressal of Sexual Harassment at Workplace (“POSH”)
Entity	Nexus Select Mall Management Private Limited (formerly known as Nexus India Retail Management Services Private Limited) (“ Manager ” or “ the Company ”) in its capacity as manager of Nexus Select Trust
Effective Date	November 13, 2022 and as amended from time to time

Version	Version Approval Date	Version Effective Date	Change Type	Policy Approving Authority
Version 1	November 13, 2022	November 13, 2022	Creation	Board of Directors of the Manager
Version 2	June 3, 2024	June 3, 2024	Modification	

Applicability	This policy is applicable to Nexus Select Mall Management Private Limited (formerly known as Nexus India Retail Management Services Private Limited) (“ Manager ” or “ the Company ”) in its capacity as Manager of Nexus Select Trust
Introduction & Objective	<p>The Manager believes that all employees and all those who deal with company have the right to work with dignity. To achieve the goal, the Manager is committed to create healthy and safe working environment where employees can report sexual harassment and deliver their best without any inhibition, threat or apprehension.</p> <p>Under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redress) Act, 2013 it is responsibility of the Company to prevent or deter the commission of acts of sexual harassment and to provide the procedures for the resolution, settlement or prosecution of acts of sexual harassment by taking all steps required. The Manager has therefore set out a policy namely Policy on Prevention, Prohibition and Redressal of Sexual Harassment at Workplace (hereafter referred to as the Policy). This policy flows from the Sexual Harassment of women at workplace (Prevention, Prohibition & Redressal) Act, 2013. Consequently, the complaint mechanism and reliefs as per this Policy are primarily focused on women. With respect to men, complaint mechanism and reliefs as per this Policy are non-statutory and at the discretion of the Company.</p> <p>It is the responsibility of all those connected with the Company to comply with this Policy.</p> <p>The Objective of the policy is:</p> <ol style="list-style-type: none"> a. Provide work environment free from all forms of sexual harassment. b. Express zero tolerance to any sexual harassment at workplace through Prevention, Resolution and Deterrence of acts of sexual harassment.
Scope	<ol style="list-style-type: none"> a. The Policy applies to all employees and third parties who engage with and / or visit the Company. Persons can be employed on regular, temporary, ad hoc or daily wage basis. These include contract workers, consultants, retainers, probationers, trainees,

	<p>and apprentices or called by any other such name by the Company. This Policy also applies to all vendors, contractors, customers, agents and suppliers of the Company.</p> <p>b. The policy will be incorporated in the service conditions of all employees explicitly or by inferences and will come into effect immediately. All parties connected with the Company are mandated to follow this policy and to work collaboratively to prevent sexual harassment.</p>
<p>Definitions</p>	<p>a. Aggrieved person: Any person (employed, connected and visiting the Company) who complained of sexual harassment.</p> <p>b. Respondent: Any person (employed, connected and visiting the Company) against whom aggrieved person complained.</p> <p>c. Workplace: Includes all offices and branches in the Company, all instances reported within the Company and in any place visited by the employee arising out of or during the employment including transportation provided by the Company for undertaking such journey.</p> <p>d. Sexual Harassment: Includes one or more of the following unwelcome acts or behaviour (whether directly or by implication)</p> <ol style="list-style-type: none"> i. Physical contact or advances (e.g., pushing, grabbing, jostling, touching the body and / or attempts to do so). ii. Demands and requests for sexual favours (e.g., unwanted sexual attention, forcing to spend time together). iii. Sexually coloured remarks (e.g., verbal sexual innuendos such as jokes, suggestions, or hints about sexual behaviour, comments about physical appearance, offensive comments abusive language). iv. Showing pornography (e.g. Display, giving or sending of pornography in the form of pictures, books, magazines, postcards, photos, animation, sound recording, film, video, and video games done personally and/ or via documents, or by telephone, cell-phone messages, web site communication, or emails). v. Any other physical, verbal and non-verbal behaviour of sexual in nature (e.g., Non-verbal communication such as staring, gestures of sexual nature, following the person, stalking, persistent visiting, telephoning, sending of cell-phone messages, or other invasions of personal privacy, spreading rumours about sexuality, gender and / or character of a person). <p>In addition to above definition, if there are following circumstances along with or apart from, it shall amount to sexual harassment (creation of hostile work environment).</p> <p>e. Hostile Work Environment will include the following:</p> <ol style="list-style-type: none"> i. Direct and / or indirect promise of preferential (special) treatment in employment. ii. Direct and / or indirect threat of detrimental (harmful / damaging) treatment in employment. iii. Direct and /or direct threat about present or future employment status.

	<ul style="list-style-type: none"> iv. Creation of conditions and situations that interfere with work or creation of an intimidating or offensive or work environment. v. Humiliating treatment likely to affect health and / or safety of the aggrieved person.
<p>Complaint Mechanism</p>	<p>An Internal Committee (IC) is constituted for the Manager.</p> <p>a. Composition of the Internal Committee (IC)</p> <ul style="list-style-type: none"> • The Internal Committee shall be presided by a woman employee at a senior level and not less than half of its members shall be women. • Not less than two members from employees shall be appointed with the Internal Committee. Further, to ensure fairness and impartiality the Internal Committee shall involve one external member. <p>b. Tenure and Working of the Internal Committee (IC)</p> <p>The Internal Committee shall hold office for period not exceeding 3 years from the date of nomination.</p> <ul style="list-style-type: none"> • The Internal Committee shall hold office for period not exceeding 3 years from the date of nomination. • A quorum of 3 members is required to be present for the meetings and proceedings to take place. The quorum shall include the presiding officer of the Internal Committee, one member of the Internal Committee and the external member. • The Internal Committee members will regularly meet at the end of every six months for the purpose of implementation of the policy and monitoring the progress done till date. • Complaint of sexual harassment regarding a member / chairperson and breach of confidentiality by the member / chairperson will lead to immediate and automatic disqualification of the concerned person from the Internal Committee as a member / chairperson. <p>The Committee will take cognizance of referrals made only to the Committee members or the Secretary who will notify the remaining Committee members. Complaints can also be registered via email to Chief Human Resources Officer at rohan.vaswani@nexusmalls.com</p> <p>In accordance with the provision of the law, the Committee shall review a complaint made by an aggrieved employee or person working for the Company which is received within a period of three months from the date of the incident or in case of a series of incidents within three months from the date of the last incident. If the Committee determines that harassment has occurred or determines that there has been a false or malicious complaint or false evidence, it may administer any combination of disciplinary</p>

	<p>measures consistent with the severity and extent of the misconduct. Such measures include without limitation (subject to applicable law):</p> <ul style="list-style-type: none"> • Verbal warning: • Additional training: • Written warning: • Requirement of a written apology: • Restitution and/ or fines: • Suspension with or without pay: • Impact performance evaluations: • Salary reduction and/or demotion: • Undergoing counselling or carrying out community service: • Termination: and <p>Such additional action as may be required under law.</p>				
No Retaliation	<p>a. The Company has zero tolerance to retaliation against the aggrieved person and all others who report such misconduct.</p> <p>b. Any act of retaliation should be reported to the Company by the aggrieved person and witnesses.</p> <p>c. Appropriate steps will be taken by the Company to ensure that retaliation will not be done and / or continued and stopped and / or corrected if reported the aggrieved person or person who, in good faith, has participated in or provided information pertaining to incident/s of sexual harassment, regardless of whether the complaint was upheld.</p> <p>d. Individuals engaging in retaliatory conduct will be subject to disciplinary action by the Company</p>				
Confidentiality	<p>a. Publication, communication or information to public and media in any manner contents of the complaint, identity and addresses of the aggrieved person, respondent and witnesses, information related to conciliation or enquiry proceedings, recommendations by the Internal Committee, and action taken by the employer shall not be done and shall be treated as confidential.</p> <p>b. Information may be disseminated regarding justice to aggrieved persons under this Policy without disclosing name, address, identity, or any other particulars leading to identification of the persons involved.</p>				
Conclusion	<p>The Company is committed to the implementation of this Policy both in letter and in spirit. The Policy is subject to modifications periodically as per changing times, needs of the organization and/or change in law. Please refer to the links below for more information on the Sexual Harassment of women at Workplace (Prevention, Prohibition and Redressal) Act, 2013.</p> <p>http://wcd.nic.in/wcdact/womenactsex.pdf</p> <p style="text-align: center;">TIMELINES AS PER LAW</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 60%; text-align: left;">Activity</th> <th style="width: 40%; text-align: left;">Time Limit</th> </tr> </thead> <tbody> <tr> <td style="height: 20px;"> </td> <td> </td> </tr> </tbody> </table>	Activity	Time Limit		
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Complaint Registration with the Internal Committee	3 months from the incident of sexual harassment or last incident in case of series of incidents.
Extension for complaint registration to be given by the IC	3 months
Documents to be sent to the respondent	Within 7 days of receipt
Respondents reply to be obtained	Not exceeding 10 days
Completion of Inquiry by the Internal Committee	90 days
Submission of Report by the Internal Committee	10 days within completion of inquiry
Action to be taken by the employer on the final recommendations by the Internal Committee	Within 60 days

a. Sexual harassment can happen both in direct and / or indirect manner. It could be asking something in exchange (Quid Pro Quo) and / or difficult, intimidating and offensive work environment (Hostile Work Environment) that interferes with the work and performance at work. It could be either before and / or after incident of sexual harassment. The behaviour may be a single incident or continuous unwelcome behaviour.

b.

i. Unwelcome denotes unwanted, undesirable and uninvited behaviour that makes a person feel uncomfortable. A behaviour or a gesture while may be acceptable to one person, need not be acceptable and comfortable for another person. Intention of the person and/or motive behind the behaviour will not be considered when it comes to classifying/naming behaviour as sexual harassment. Sexual harassment cannot be justified and defended from this point of view. If the person was offended, humiliated or intimidated by the behaviour of the person or even felt so, it will fall within the purview of this Policy. It is important how the person perceives/understands /interprets the behaviour. Impact and effect of the sexual harassment on the person is important.

ii. The behaviour will be held as unwelcome, if the person has made it clear that the behaviour is offensive and unwelcome. This will be pronounced where the person of the behaviour is junior and indicating that the behaviour is unwelcome to a senior would be difficult.

Examples: granting or denying recruitment, granting or denying promotion, threat of demotion, threat of termination or suspension, achieving or denying a privileged position such as a board member / special committee member, positive or negative performance appraisal result / career advancement, threats to spoil career, increased or decreased remuneration / bonus / allowances, issuing or denying any other form of benefit or enhancement such as travel overseas, or training, or conference attendance or such related activities.

Amendment	<p>This Policy will stand automatically amended to the extent of any relevant change(s) in the applicable law and or for any change(s) in fact.</p> <p>This policy shall be modified by Board of Directors of the Company based on the recommendations, if any.</p>