

POLICY FOR PREVENTION OF SEXUAL HARASSMENT AT WORKPLACE

Reference	MREIT/POSH-V3/2024
Approving Authority	Board of Directors of K Raheja Corp Investment Managers Private Limited (Formerly known as K Raheja Corp Investment Managers LLP) (‘Manager’ or ‘Investment Manager’) as the manager of Mindspace Business Parks REIT (‘Mindspace REIT’ or ‘REIT’)
Effective Date	This policy for Prevention of Sexual Harassment at Workplace (“POSH Policy” or “Policy”) shall come into effect from the date it was adopted by the Board of Directors at their board meeting held on July 17, 2023.

Revision History		
Version	Date	Change Type
V1	July 17, 2023	Approved
V2	October 30, 2023	Amended
V3	March 25, 2024	Amended

1. PURPOSE

We desire to uphold a healthy and congenial working environment that enables employees to work without fear of prejudice, gender bias and sexual harassment.

2. SCOPE

This policy is applicable to all employees of K Raheja Corp Investment Managers Private Limited (Formerly known as “K Raheja Corp Investment Managers LLP”) (**“Manager”** or **“Investment Manager”**) acting as the manager of Mindspace Business Parks REIT (**“Mindspace REIT”** or **“REIT”**).

3. INTRODUCTION

We value every employee and are committed to protect the dignity and respect of each employee. We have ‘zero tolerance’ for sexual harassment and any act of sexual harassment will invite serious disciplinary action.

This policy aims to inform the employees about what conduct constitutes sexual harassment and in the unlikely chance of such an occurrence, to enable a fair mechanism for dealing with such misconduct.

4. POLICY COVERAGE

‘Sexual Harassment’ is any unwelcome sexually determined behavior (whether directly or by implication), such as:

- Physical contact and advances
- A demand or request for sexual favors; whether verbal, textual, graphic, electronic or by any other action.
- Sexually colored remarks
- Showing pornography

- Any other unwelcome physical, verbal or non-verbal conduct of sexual nature whether by words, gestures or actions.

5. INTERNAL COMMITTEE

An Internal Committee has been constituted to consider and redress complaints of Sexual Harassment.

Committee:

Chairperson/Presiding Officer	Ms. Manisha Gupta Email id: mgupta@kraheja.com Contact no: 09820973455
Member	Ms. Neetu Shukla Email id: neetu.shukla@kraheja.com Contact no: 09819593315
Member	Mr. Govardhan Gedela Email id: ggedela@kraheja.com Contact no : 09987540334
Member	Ms. Hiral Motta Email id: hmotta@kraheja.com Contact no: 08591070077.
Member	Ms. Ameeta Aziz Parpia, Advocate (External Committee Member) Email id: ameeta@ahparpiaco.com Contact no: 9820433857

6. COMPLAINT PROCESS

- I. Any employee who feels being sexually harassed directly or indirectly may submit a complaint of the alleged incident to any member of the Internal Committee in writing with his / her signature within 3 months from the date of the incident and in case of a series of incidents, within a period of 3 months from the date of the last incident.
- II. In the event where the victim has approached/communicated to anybody else other than the internal committee, then that person is required to inform only to the committee immediately and no one else without any delay. He or she should also ensure that confidentiality of the incident/victim is maintained and not disclosed to anybody else.
- III. The Internal Committee will hold a meeting with the Complainant within a week of the receipt of the complaint. Thereafter, the person against whom complaint is made may be called for a deposition before the Committee and an opportunity will be given to him / her to give an explanation, where after, an "Enquiry" shall be conducted and concluded.
- IV. The Internal Committee shall immediately proceed with the Enquiry and communicate the same to the Complainant and person against whom complaint is made.
- V. In the event, the complaint does not fall under the purview of Sexual Harassment or the complaint does not constitute an offence of Sexual Harassment, the same would be dropped after recording the reasons thereof.

VI. In order to ensure that this important matter is not trivialized, any complaint which, in the opinion of the Internal Committee, is deliberately false or frivolous would be viewed very seriously.

VII. The Internal Committee shall complete the Enquiry within a period of 90 days from the date of receipt of complaint and will submit the report within 10 days of completion of the Enquiry. The exact nature of any disciplinary action taken against any person will remain confidential.

The Internal Committee shall be governed by such rules as may be framed by Supreme Court Orders from time to time and by any other legislation that may be enacted on this subject from time to time.

Given the sensitive nature of cases of sexual harassment and their impact on the victim as well as the person against whom such allegations are leveled, K Raheja Corp is committed to maintaining confidentiality in relation to such complaints and the resultant Enquiry.

7. PENALTY CLAUSE

If the complaint is found to be true, the Employer will initiate any/all of the below mentioned actions:

- a) Warning letter
- b) Transfer of services
- c) Suspension/Termination of employment

8. AMENDMENT

The Company reserves the right to amend or modify this policy in whole or in part, at any time without assigning any reason whatsoever.