

## 8. Prevention of Sexual Harassment *[Effective: March 4, 2024]*

### 8.1. Background

PNB Housing Finance Limited (PNBHFL) is committed in promoting a work environment that encourages harmony, productivity and individual growth and strives to ensure that no woman is subjected to sexual harassment at the workplace. The organization is committed in preventing, prohibiting and taking necessary corrective actions through appropriate redressal mechanisms against any form of sexual harassment at the workplace which is defined in this Policy.

This policy has been framed in accordance with the provisions of “The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013” and rules framed thereunder (hereinafter “the Act”). Accordingly, while the policy covers all 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.

Sexual harassment at the workplace, if involving any aggrieved employee is a grave offence and is punishable.

### 8.2. Applicability

This policy applies to all employees of PNBHFL including management trainees, apprentices, retainers, interns, temporary employees, any person deployed by subsidiary company, third party employee, visitors, vendors, suppliers or called by any other such name, but are subjected to sexual harassment at the workplace (defined hereinafter) of the Company.

### 8.3. Definitions

- a) “Sexual Harassment” maybe one or a series of incidents that occur at a workplace or while working from home and involving unsolicited and unwelcome sexual advances, requests for sexual favours, or any other verbal or physical conduct of sexual nature.

Acts of Sexual Harassment against an aggrieved woman include (but are not limited to) unwelcome sexually determined acts or behaviour (whether directly or by implication) listed below:

- i. Unwelcome physical contact on any part of the body, or advances which affronts the dignity of the Complainant or Aggrieved Woman
  - ii. A demand or request for sexual favours
  - iii. Making sexually coloured remarks
  - iv. Showing pornography
  - v. Any other unwelcome, physical, verbal or non-verbal conduct of sexual nature
  - vi. Interference with her work or creating an intimidating or offensive or hostile work environment in relation to or connected with any act or behaviour of Sexual Harassment.
- b) “Workplace” shall mean and include all Company premises and places where interaction is arising out of or during the course of employment and shall include transportation provided by the company, offsites, office and team parties, get-together, internet (WhatsApp,

- Instagram, Facebook, LinkedIn or any other social media platform) any interaction outside the office which is primarily arising out of official relationship between the parties.
- c) “Internal Committee or IC” means the committee constituted by the organisation to address the complaints of sexual harassment.
  - d) “Presiding officer” means the Presiding officer of the IC nominated by the company in accordance with the Act.
  - e) “Aggrieved woman” shall mean any Women Personnel, who in relation to a workplace and may be a victim of Sexual Harassment.
  - f) “Respondent” is a person against whom the aggrieved woman has made a complaint.

#### **8.4. Internal Committee for Sexual Harassment**

A Committee has been constituted to consider and address complaints of sexual harassment. The members of the committee will be appointed by Managing Director & CEO as recommended by the Chief People Officer of the Company. The sexual harassment policy derives its governance and action from the prescribed Act.

##### **8.4.1. The Internal Committee (IC) comprises of:**

- Presiding Officer: A woman employed at a senior level at the workplace amongst the employees and designated by the organisation to be a Presiding Officer.
- At least 2 members from amongst employees, preferably committed to the cause of women and or having legal knowledge.
- One external member, familiar with the issues related to sexual harassment.
- At least one half of the total members are women.

##### **8.4.2. The Internal Committee is responsible for:**

- Receiving complaints of sexual harassment at the workplace
- Initiating and conducting inquiry as per the established procedure
- Submitting findings and recommendations of inquiries
- Maintaining strict confidentiality throughout the process as per established guidelines
- Submitting annual reports in the prescribed format

Current nominated members of the committees are given in Annexure A.

#### **8.5. Procedure to Raise a Complaint**

- a) An employee who has been subjected to sexual harassment should report the incident immediately to any of the following –
  - i. Human Resource
  - ii. Chairperson of Internal Committee
  - iii. any member of the Internal Committee
  - iv. or write an email at POSH@pnbhousing.com

- b) The complaint must be lodged within 3 months from the date of incident/ last incident. The Internal Committee can extend the timeline by another 3 months for reasons recorded in writing, if satisfied that these reasons prevented in lodging of the complaint.
- c) If the aggrieved woman is unable to lodge the complaint in account of her incapacity, the following may do so on her behalf, with her written consent.
  - d) Legal heir, relative or friend
  - e) Co-worker/ Reporting manager
  - f) Any person having the knowledge of the incident.
- g) Complaints received from any other source or anonyms complaints will not be entertained by the IC. Complaints received from any other source shall be taken up for investigation by IC only and only written confirmation of the aggrieved female that she wants the matter to be taken up by the IC.
- h) If the aggrieved female does not want the matter to be taken up with IC post submission of a written complaint a written confirmation from her of the same must be taken.

## 8.6. Investigation

### 8.6.1. Resolution procedure through conciliation:

Once the complaint is received, before initiating the inquiry the IC may take steps to conciliate the complaint between the respondent and complainant (only if the complainant is the aggrieved woman). It is made clear to all parties that conciliation in itself doesn't necessarily mean acceptance of complaint by the respondent. It is a practical mechanism through which issues are resolved or misunderstandings cleared. In case a settlement has been arrived at between the aggrieved party and the respondent, then IC shall record the settlement so arrived in writing along with the recommendations of the Inquiry committee and forward the same to the Managing Director & CEO along with Chief People Officer for taking appropriate action.

The Inquiry committee shall provide a copy of the terms of settlement as recorded to the aggrieved party and respondent. Consequent thereto, the Inquiry committee shall close the proceedings and shall not carry out any inquiry on the said complaint.

### 8.6.2. Resolution procedure through formal inquiry

Conducting Inquiry

The IC initiates inquiry in the following cases:

- No conciliation is requested by aggrieved woman.
- Conciliation has not resulted in any settlement.
- Complainant informs the committee that any terms and conditions of the settlement arrived through conciliation, has not been complied with by respondent.
- The Committee proceeds to make an inquiry into the complaint after the receipt of the original complaint/closure of conciliation/repeat complaint.

### **8.6.3. Manner of inquiry into complaint:**

- The IC would carry out an inquiry into the complaint received. For the purpose of this inquiry, IC shall nominate three (3) or five (5) persons from amongst its members as the inquiry team.
- Complainant should submit the complaint along with supporting documents and the names of the witnesses.
- The IC within stipulated timelines after receiving the complaint shall forward one copy thereof to the Respondent for obtaining a response.
- Respondent replies with all supporting documents within stipulated timelines after receiving the copy of the complaint.
- The IC shall hear both the Complainant and the Respondent on date(s) intimated to them in advance and the principles of natural justice will be followed accordingly.
- The IC has powers to:
  - Summon and enforce the attendance of any person and examine him on oath.
  - Require the discovery and production of documents.
- 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 themselves, for three consecutive hearings convened by the Chairperson or Presiding Officer. 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.
- The Complainant and the Respondent shall not be allowed to bring in any legal practitioner to represent them in their case at any stage of the proceedings before the committee. However, they may be accompanied by a colleague for psychological or emotional support. Such colleague will not be permitted to speak at or otherwise interfere with the proceedings of the IC.
- All efforts should be taken to expedite the process and complete the inquiry as early as possible. The inquiry should be completed within a maximum of 90 days.

### **8.7. Interim actions that can be taken while inquiry is in progress:**

During pendency of the inquiry, on a written request made by the complainant, the committee may recommend that PNBHFL –

- 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 complainant's work performance, day to day reporting and any activity arising out of work relationship.
- Grant such other relief as may be appropriate. Once the recommendations of interim relief are implemented, the management will inform the committee regarding the same.

### **8.8. Inquiry Report and Recommendations:**

Summary of the findings will be made available to both the parties (complainant and respondent).

Post sharing the findings, the Inquiry committee shall submit the final report along with its recommendations to the Company within a period of 10 days from the date of completion of the inquiry to CPO along with MD & CEO.

If the conclusion is that:

- a) The allegation has not been proved; the IC shall recommend to the Company that no action is required to be taken in the matter.
- b) If the allegation against the respondent has been proved, the IC shall recommend to the Company to take action for sexual harassment as a misconduct in accordance with the applicable policy.

The Company has to act upon the recommendation within 60 days of receipt of the same.

### **8.9. False or Malicious Complaint**

In case the IC arrives at a conclusion that the allegation against the Respondent is malicious, or the Complainant has made the complaint knowing it to be false or has produced any forged or misleading document, and the malicious intent of the complainant is proved, then based on the findings of the inquiry committee may recommend to the Company to take appropriate action against the complainant in accordance with the applicable policy.

A similar recommendation for taking action would be recommended against any witness whom the IC concludes has given false evidence or produced forged or misleading documents.

### **8.10. Appeal**

Any person aggrieved from the recommendations made by the IC or non-implementation of such recommendations may prefer an appeal to the court or tribunal in accordance with the Act and rules.

The appeal shall be preferred within 90 days of the recommendations being communicated.

### **8.11. Prohibition of Retaliation:**

Retaliation of any kind against anyone who is involved in the investigation of or in making an allegation of sexual harassment is prohibited and will result in disciplinary action against the retaliator, including termination of employment.

### **8.12. Confidentiality**

The identity of the complainant, respondent, witnesses, statements and other evidence obtained in the course of inquiry process, recommendations of the committees, action taken by the employer is considered as confidential materials, and not published or made known to public or media.

The identity of the complainant, respondent, witnesses, statements and other evidence obtained in the course of inquiry process, recommendations of the committees, action taken by the employer is considered as confidential materials, and not published or made known to public or media.

### 8.13. Annual Reporting

The IC shall prepare an Annual Report and submit the details to MD & CEO or to the designated authority as in when required.

### 8.14. Exceptions and Signing Authority

The above sexual harassment policy is subject to exceptions that can be approved by the Board of Directors of PNBHFL or the NRC.

#### Annexure 1: List of Internal Committee Members

##### CSO & North Zone

Name	Role	Contact No	Location	Tenure	Email id
Ms. Veena Kamath	Chairperson	9845028520	Extended_CS0	20/02/2024 to 19/02/2027	<a href="mailto:veena.kamath@pnbhousing.com">veena.kamath@pnbhousing.com</a>
Ms. Apoorva Bhateja	Internal Member	7290061317	CSO	31/03/2024 to 30/03/2027	<a href="mailto:apoorva.bhateja@pnbhousing.com">apoorva.bhateja@pnbhousing.com</a>
Ms. Ruchika Chawla	Internal Member	9971344800	Extended_CS0	10/02/2022 to 09/02/2025	<a href="mailto:ruchika.chawla@pnbhousing.com">ruchika.chawla@pnbhousing.com</a>
Ms. Priyanka Agrawal	Internal Member	9319746934	Extended_CS0	22/08/2023 to 21/08/2026	<a href="mailto:priyanka.agrawal@pnbhousing.com">priyanka.agrawal@pnbhousing.com</a>
Mr. Vishal Mehta	Internal Member	8558862211	North	03/10/2023 to 02/10/2026	<a href="mailto:Vishal.mehta1@pnbhousing.com">Vishal.mehta1@pnbhousing.com</a>
Mr Vikas Bhutani	Internal Member	7042594448	Extended_CS0	03/10/2023 to 02/10/2026	<a href="mailto:vikas.bhutani@pnbhousing.com">vikas.bhutani@pnbhousing.com</a>
Dr. Anagha Sarpotdar	External Member	7506907837	NGO	01/10/2023 to 30/09/2026	<a href="mailto:anagha75.sarpotdar@gmail.com">anagha75.sarpotdar@gmail.com</a>

**West Zone**

Name	Role	Contact No	Location	Tenure	Email id
Ms. Veena Kamath	Chairperson	9845028520	Extended_CSO	20/02/2024 to 19/02/2027	<a href="mailto:veena.kamath@pnbhousing.com">veena.kamath@pnbhousing.com</a>
Ms. Priyanka Agrawal	Internal Member	9319746934	Extended_CSO	22/08/2023 to 21/08/2026	<a href="mailto:Priyanka.agrawal@pnbhousing.com">Priyanka.agrawal@pnbhousing.com</a>
Ms. Nikita Nahar	Internal Member	9920287484	Mumbai	02/03/2024 to 01/03/2027	<a href="mailto:nikita.nahar@pnbhousing.com">nikita.nahar@pnbhousing.com</a>
Mr. Kaushal Vyas	Internal Member	9987956168	Mumbai	16/06/2022 to 15/05/2025	<a href="mailto:kaushal.vyas@pnbhousing.com">kaushal.vyas@pnbhousing.com</a>
Mr. Deepak Bhagwan Kamble	Internal Member	9892994745	Mumbai	03/10/2023 to 02/10/2026	<a href="mailto:Deepak.kamble@pnbhousing.com">Deepak.kamble@pnbhousing.com</a>
Dr Anagha Sarpotdar	External Member	7506907837	NGO	01/10/2023 to 30/09/2026	<a href="mailto:anagha75.sarpotdar@gmail.com">anagha75.sarpotdar@gmail.com</a>

**South Zone**

Name	Role	Contact No	Location	Tenure	Email id
Ms. Veena Kamath	Chairperson	9845028520	Extended_CSO	20/02/2024 to 19/02/2027	<a href="mailto:veena.kamath@pnbhousing.com">veena.kamath@pnbhousing.com</a>
Ms. Rekha R Mallya	Internal Member	9845335084	Bangalore	03/10/2023 to 02/10/2026	<a href="mailto:rekha.mallya@pnbhousing.com">rekha.mallya@pnbhousing.com</a>
Ms. Priyanka Agrawal	Internal Member	9319746934	Extended_CSO	22/08/2023 to 21/08/2026	<a href="mailto:Priyanka.agrawal@pnbhousing.com">Priyanka.agrawal@pnbhousing.com</a>
Ms. Prachi Dikshit	Internal Member	7259586186	Bangalore	16/06/2022 to 15/05/2025	<a href="mailto:prachi.dikshit@pnbhousing.com">prachi.dikshit@pnbhousing.com</a>
Mr. Balaji TK	Internal Member	9629415151	Coimbatore	16/06/2022 to 15/05/2025	<a href="mailto:balaji.tk@pnbhousing.com">balaji.tk@pnbhousing.com</a>
Mr. Madhavan R	Internal Member	9611542886	Cochin	16/06/2022 to 15/05/2025	<a href="mailto:madhavan.r1@pnbhousing.com">madhavan.r1@pnbhousing.com</a>
Dr Anagha Sarpotdar	External Member	7506907837	NGO	01/10/2023 to 30/09/2026	<a href="mailto:anagha75.sarpotdar@gmail.com">anagha75.sarpotdar@gmail.com</a>

## 9. Whistle blower *[Effective: February 3, 2023]*

### 9.1. Preface

- a. PNB Housing believes to conduct its affairs in a fair and transparent manner by adopting highest standards of professionalism, honesty, integrity and ethical behaviour. The Company is committed to developing a culture where it is safe for all employees to raise concerns about any wrongful conduct concerning the policies, procedures, codes and applicable laws, rules and regulations of the Company or in relation to corruption, misuse of office, criminal offence, suspected/ actual fraud, fraudulent reporting, misappropriation or mismanagement of the Company's assets, (hereinafter collectively referred to as 'alleged wrongful conduct') made by him in good faith and to ensure that no adverse action is taken knowingly and in retaliation to the said disclosure and to provide for the procedure thereof.
- b. This Whistle Blower Policy ("the Policy") is formulated in terms of the Regulation 22 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Listing Regulations") and the relevant provisions under Section 177(9 & 10) of the Companies Act, 2013 and the rules made thereunder.
- c. Further, Regulation 4(2)(d)(iv) of the Listing Regulations, inter-alia, provides entities shall devise an effective whistle blower mechanism enabling stakeholders, including individual employees and their representative bodies, to freely communicate their concerns about illegal and unethical practices. This Whistle Blower Policy ("the Policy") is formulated in terms of the Regulation 22 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Listing Regulations") and the relevant provisions under Section 177(9 & 10) of the Companies Act, 2013 and the rules made thereunder.

### 9.2. Purpose of the Policy

The purpose of this Policy is to provide a framework to promote responsible and secure whistle blowing. It protects employees wishing to raise a concern about serious irregularities within the Company.

The Policy neither releases employees from their duty of confidentiality in the course of their work, nor is it a route for taking up a grievance about a personal situation.

### 9.3. Applicability

This Policy and its guidelines will cover all the employees and directors of the Company and its subsidiaries, who may have made a complaint in good faith of any instance of alleged wrongful conduct and as a result of which he/she will not be subjected to any victimization by the Company.



#### **9.4. Scope of the Policy**

This Policy covers malpractices and events which have taken place / suspected to have taken place, misuse or abuse of authority, fraud or suspected fraud, violation of company rules, manipulations, negligence causing danger to public health and safety, misappropriation of monies, Leakage or suspected leakage of unpublished price sensitive information(UPSI) relating to the Company in violation of SEBI(prohibition of Insider trading) regulations, 2015 and other matters or activity on account of which Company's interest is affected and formally reported by whistle blowers.

#### **9.5. Definitions**

- I. "Alleged wrongful conduct" shall mean violation of law, infringement of Company's policies or procedures, misappropriation of monies, actual or suspected fraud, substantial and specific danger to public health and safety or abuse of authority or any other unethical practice or events which affects the interest of the Company adversely and has the potential to cause financial or reputational loss to the Company".
- II. "Protected Disclosure" means a concern raised by an employee or group of employees of the Company, through a written communication and made in good faith which discloses or demonstrates information about an unethical or improper activity with respect to the Company. It should be factual and not speculative or in the nature of an interpretation / conclusion and should contain as much specific information as possible to allow for proper assessment of the nature and extent of the concern.
- III. "Whistle Blower" means an employee, group of employees or directors who make a Protected Disclosure and also referred in this Policy as complainant.
- IV. "Subject" means a person against or in relation to whom a Protected Disclosure is made or evidence gathered during the course of an investigation.
- V. "Nodal Officer" will be the Chief People Officer for the purpose of receiving all complaints and ensuring appropriate action. The MD&CEO shall have the authority to change the Nodal Officer from time to time.
- VI. "Unpublished Price Sensitive Information" means any information, relating to the Company or its securities, directly or indirectly, that is not generally available which upon becoming generally available is likely to materially affect the price of the Securities of the Company.
- VII. "Employee" means employees or directors of PNB Housing Finance Limited.

### **9.6. Eligibility**

All PNB Housing Finance Limited employees are eligible to make Protected Disclosures under the Policy in relation to matters concerning the Company.

### **9.7. Misuse**

- I. While it will be ensured that genuine Whistle Blowers are accorded complete protection from any kind of unfair treatment as herein set out, complainants are advised against abuse of this protection.
- II. Whistle Blowers are advised not to make any false or bogus allegations with a mala fide intention.
- III. Whistle Blowers, who make any Protected Disclosures, which have been subsequently found to be mala fide or malicious or Whistle Blowers who makes frequent Protected Disclosures, which have been subsequently found to be frivolous, baseless or reported otherwise than in good faith, will be subjected to strict action and will be advised against such indulgence.

### **9.8. Whistle Blower Committee**

The Whistle Blower Committee shall comprise of Chief Compliance Officer, Chief People Officer, Chief Financial Officer and Head – Internal Audit of the Company. Any 3 members will form the quorum. Head – Internal Audit shall be the Chairman of the Committee, however, in his absence, any other member may be appointed as Chairman for a specific meeting. The Audit Committee may change the composition of the Committee.

Note: The Company Secretary & Head Compliance shall discharge the responsibility till the appointment of Chief Compliance Officer.

### **9.9. Protection**

- I. No unfair treatment will be meted out to a Whistle Blower by virtue of his/ her having reported a Protected Disclosure. The Company will take steps to minimize difficulties, which the Whistle Blower may experience as a result of making the Protected Disclosure.
- II. The identity of the Whistle Blower shall be kept confidential to the extent possible and permitted under the Law. The identity of the complainant will not be revealed unless he himself has made either his details public or disclosed his identity to any other office or authority. In the event of the identity of the complainant being disclosed, the Audit Committee is authorized to initiate appropriate action as per regulations against the person or agency making such disclosure. The identity of the Whistle Blower, if known, shall remain confidential to those persons directly involved in applying this Policy, unless the issue requires investigation by law enforcement agencies, in which case members of the organization are subject to subpoena.
- III. Any other Employee assisting in the said investigation shall also be protected to the same extent as the Whistle Blower. It shall be ensured that the Whistle blower is not victimized, harassed, threatened etc. for making the disclosure

- IV. If on the basis of the complaint, the Company is of the opinion that either the complainant or the witnesses in the case, need protection, the Company shall issue appropriate directions to the Chief People Officer, in this regard.
- V. A Whistle Blower may report any violation of the above clause to the Managing Director, who shall investigate into the same and recommend suitable action to the management.

#### **9.10. Secrecy / Confidentiality**

The complainant, Nodal Officer, Whistle Blower Committee, Members of Audit Committee, the Subject and everybody involved in the process shall:

- I. Maintain confidentiality of all matters.
- II. Discuss only to the extent or with those persons as required for completing the process of investigations.
- III. Not keep the papers unattended anywhere at any time.

#### **9.11. Decision and Reporting**

- I. If an investigation leads the Whistle Blower Committee to conclude that an improper or unethical act has been committed, the Committee shall recommend to the Managing Director & CEO to take such disciplinary or corrective action as he may deem fit.
- II. A quarterly report on number of complaints received under the Policy and their outcome shall be placed before the Audit Committee by Nodal Officer.

#### **9.12. Communications**

All employees shall be notified of the contents of this Policy which shall also be put on the Intranet for the access of employees. New employees shall be informed of this Policy on their joining the services of the Company. The Policy shall also be uploaded on the website of the Company.

#### **9.13. Administration and Review of the Policy**

- I. The Managing Director & CEO shall be responsible for the administration, interpretation, application of this Policy.
- II. This Policy is to be reviewed annually or at earlier intervals by the Board of Directors of the Company, if necessary. Consequent upon changes in law/rules/regulation/regulatory guidelines etc., such changes shall be deemed to be a part of the Policy until the Policy is reviewed and approved next time.

- III. Notwithstanding anything contained in this Policy, in case of any contradiction of the provision of this Policy with any existing legislations, rules, regulations or laws the provisions of such law, legislation, rules, regulation or enactment shall prevail over this Policy.

#### **9.14. Whistle Blower Procedure**

- I. All protected disclosures against any employee irrespective of his/her grade shall be forwarded in writing and signed by the whistle blower and delivered in a sealed envelope to the Nodal Officer (Address – Chief People Officer, Antriksh Bhawan, 22, Kasturba Gandhi Marg, New Delhi – 110019) within 7 days from the knowledge of the alleged wrongful conduct. Alternatively, the same can also be sent through email with the subject “Protected disclosure under the Whistle Blower Policy” to the email ID- [whistleblower@pnbhousing.com](mailto:whistleblower@pnbhousing.com). If any person receives a complaint from a complainant, then he can forward it to the nodal officer. Protected Disclosures concerning the Nodal Officer should be addressed to the Managing Director & CEO of the Company.
- II. All protected disclosures shall state the name, employee number, department/ branch, background and history of the alleged wrongful conduct giving the names, dates, events and places etc. and the reason why the whistle blower is particularly concerned about the situation.
- III. Any unsigned or, anonymous disclosures shall not be entertained.
- IV. The Nodal Officer shall acknowledge receipt of the protected disclosure and initiate appropriate action within 15 days from the date of its receipt.
- V. In order to protect the whistle blower and the Company from adverse publicity, initial enquiries may be conducted by the Nodal Officer or by a suitable person as decided by the Nodal Officer to decide whether an investigation is appropriate and if so, what form it should take.
- VI. In case, if it is felt that the investigation needs to be initiated, the Nodal Officer shall, inform the Whistle Blower Committee about the same. The Whistle Blower Committee may at its discretion consider involving any other Officer of the Company and/ or an outside agency for the purpose of investigation. After taking into account the facts and evidences of the protected disclosures, The Whistle Blower Committee may also resolve to an agreed action without need for any further investigation.
- VII. The decision to conduct an investigation is by itself not an accusation and is to be treated as a neutral factfinding process.
- VIII. Additional information may be sought from the whistle blower by the Nodal Officer or any person appointed by the Nodal Officer, depending on the nature of the complaint, its seriousness, difficulties involved in collating additional evidence.
- IX. The investigation shall be completed normally within 60 days of the receipt of the protected disclosure and is extendable by such period as the Whistle Blower Committee deems fit.

- X. On completion of the investigation, the Nodal Officer shall forward the findings / recommendations to the Whistle blower Committee, within 15 days of completion of the investigation.
  
- XI. The Whistle Blower Committee shall, after taking into account the allegations made, evidence provided in the protected disclosure and the recommendation offered by the nodal officer, decide on an appropriate action, which inter alia could include the following:
  - a. Whether to refer the matter for further internal investigation or subject the same to an independent external enquiry.
  - b. Appropriate disciplinary action including but not limited to withholding of increments, stock options or termination from the services of the Company as per the provisions of the PNB Housing Finance Ltd Employee's Conduct, Discipline and Appeal Rules 2012.
  - c. Appropriate administrative steps to recover any loss caused to the Company as a result of the alleged wrongful act by the accused.
  - d. Initiating any criminal proceedings against the accused.
  - e. Referring the matter to law enforcement agencies.
  - f. Recommending corrective action/ measures to prevent recurrence of such events in future.
  - g. Any other action as deemed fit keeping in view facts of the case.
  
- XII. An appeal against the decision of the Whistle Blower Committee shall lie before the Managing Director & CEO, whose decision in this regard shall be final and binding on all concerned.
  
- XIII. A complaint against the Managing Director & CEO can be made to the Chairman of the Audit Committee at [chairmanacb@pnbhousing.com](mailto:chairmanacb@pnbhousing.com) and it would be investigated as decided by the Audit Committee.
  
- XIV. In appropriate or exceptional cases, employees or Directors may also directly report concerns or complaints of violation or potential violation to the Chairman of the Audit Committee at [chairmanacb@pnbhousing.com](mailto:chairmanacb@pnbhousing.com).

### **9.15. Record Retention**

All records under this policy will be maintained for a period of 10 years.

## 10. Disciplinary Action Policy *[Effective: March 4, 2024]*

### 10.1. Purpose

The policy aims to create an internal governance framework and defines unacceptable employee action and the resultant redressal approach. It is designed to achieve fair methods for dealing with disciplinary matters.

The procedural steps set out in this policy are a guide to be taken to deal with each situation reasonably and, wherever possible, help the person concerned to improve their conduct of behavior to reach acceptable standards. The steps taken will depend upon the circumstances in each case and the point at which the disciplinary procedure is initiated, or the omission of any of the stages, will depend entirely on the seriousness and the nature of the misconduct.

This policy also aims to encourage employees to voice concerns about perceived injustice, mistreatment, or persistent obstacles caused due to interpersonal issues or issues arising from the interpretation and implementation of the Company's policies and processes.

The purpose of the Disciplinary policy is to-

- a) Set and maintain standards of conduct within PNB Housing Finance Ltd (PNBHFL).
- b) Help and encourage all employees to maintain satisfactory standards of conduct.
- c) To explain the company's disciplinary action process for policy violations

### 10.2. Applicability

This policy is applicable to all employees of PNBHFL, including full-time, part-time, interns, trainees, retainers, apprentices and contractual employees of PNBHFL.

This policy is applicable at the workplace, during work hours, and anything incidental to the workplace such as official trips, official outbounds, parties, and company transport.

### 10.3. Disciplinary Procedures

The procedures are primarily tools to help and encourage improvement amongst employees whose conduct is unsatisfactory. There are two primary areas in which disciplinary action may be required.

**Minor Misconduct** – Minor Misconduct means improper conduct or wrongful behavior with reference to the rules and regulations applicable to the PNBHFL

employees. Minor misconduct includes, but is not limited to, the incidents and/or actions indicated in Annexure 1.1.

**Major misconduct** – Major misconduct includes, but is not limited to, the incidents and/or actions indicated in Annexure 1.2.

\* Note: Misconducts mentioned in annexures 1.1 and 1.2 are not limited to the list and can be defined on case-to-case basis depending upon the facts and the decision taken by the disciplinary authority.

#### **10.4. Authority to institute Disciplinary Proceedings and Impose Penalties**

The Disciplinary Authority may institute disciplinary proceedings against an employee of the company as per the Disciplinary authority grid defined below (clause 18).

#### **10.5. Process for taking Disciplinary Action**

##### **10.5.1. For Minor Misconducts:**

- a) Where it is proposed to impose any minor penalty, the employee concerned shall be informed in writing of the charges of misconduct against him/her and given an opportunity to submit his/her written statement of defence within a specified period not exceeding 7 days or any other time period specified by the Disciplinary Authority.
- b) Where the Disciplinary Authority is satisfied that an inquiry is necessary, it shall follow the procedure for imposing a major penalty as laid down.
- c) the record of such cases shall include:
  - i. a copy of the charges furnished to the employee.
  - ii. the defence statement, if any, of the employee
  - iii. hearing in person, in case required.
  - iv. the orders of the Disciplinary Authority together with the reason
- d) In case of minor misconduct, If for any reason, it is not possible to conduct the domestic enquiry, the respective Disciplinary Authority may straightaway proceed to take necessary disciplinary actions based on the available material facts.

##### **10.5.2. For Major Misconducts:**

- a) All complaints and proceedings with respect to irregularities in high-risk areas, fraudulent irregularities or gross violations of the Code of Conduct as well as minor aberrations in the region shall be addressed to and led by the Disciplinary Authority and shall take necessary corrective action.
- b) An employee who is alleged to have committed an act of misconduct (other than minor misconduct) shall be given a show cause in writing by the Disciplinary Authority or such other officer/s who are so authorized by the management, calling for a written explanation within 3 working days, except if the employee requests for more time, in such a case the time can be extended to another 2 working days from the date of receipt of the show cause.

- c) The employee shall submit his/her explanation in writing accepting the guilt or refuting the allegations made against him in the show cause within the stipulated time. The management shall consider the explanation submitted by the employee, and if the explanation is found to be unsatisfactory employee shall be given a chargesheet in writing by the Disciplinary Authority or such other officer/s who are so authorized by the management, calling for a written explanation within 3 working days, except if the employee requests for more time, in such a case the time can be extended to another 2 working days from the date of receipt of the chargesheet.
- d) The employee shall submit his/her explanation in writing accepting the guilt or refuting the allegations made against him in the charge-sheet within the stipulated time. The management shall consider the explanation submitted by the employee, and if the explanation is found to be unsatisfactory, a domestic enquiry may be conducted. Thereafter in case required personal hearing may be granted before passing any order.
- e) On receipt of the written statement of the employee, or if no such statement is received within the specified time, an enquiry may be held by the Disciplinary Authority or if it considers it necessary to do so, appoint an Inquiry Authority (an employee or an outsider) for the purpose by an order. Where the Disciplinary Authority itself inquires or appoints an inquiring authority for holding an inquiry, it may, by an order, appoint an employee of the company to be known as the "Presenting Officer" to present the case on behalf of company to support the articles of charge.

Provided that it may not be necessary to hold an inquiry in respect of the articles of charge admitted by the employee in his/her written statement but shall be necessary to record its finding on each such charge.

- f) The Disciplinary Authority shall provide all the prima facie facts and evidence that has been collected for the misconduct to the Inquiry Authority if the investigation is done by them.
- g) The employee may seek permission for appointing an intermediary who may present his/her case on his/her behalf but may not engage a legal practitioner for the purpose. Further, the Disciplinary Authority can take a decision whether the appointment of an intermediary in the ongoing proceeding is required or not.

NOTE: The disciplinary authority may refute any such request where the delinquent employee has requested for employee assistance who is undergoing in any investigation.

- h) The Inquiring Authority shall by notice in writing specify the day on which the employee shall appear in person before the Inquiring Authority.
- i) On the date fixed by the Inquiring Authority, the employee shall appear before the Inquiring Authority at the time, date and place specified in the notice.
- j) The Inquiring Authority shall ask the employee whether he pleads guilty or has any defence to make and if he pleads guilty to any of the articles of charge, the Inquiring Authority shall record the plea and take the acknowledgement of the delinquent employee.
- k) If the employee does not plead guilty to any of the articles of charge mentioned in the charge sheet, the Inquiring Authority shall adjourn the case to another date not exceeding 30 days or within such extended time depending upon the case.
- l) The Inquiring Authority shall, where the employee does not admit all or any of the charges, conduct the enquiry on remaining charges.



- m) The Inquiring Authority may also record an order that the employee may for the purpose of preparing his/ her defence may inspect within five days the document listed, submit a list of documents and witnesses that he/ she wants for the inquiry and may submit a request to produce documents/facts in support within five days.
- n) On the date of inquiry, the Presenting Officer on behalf of Disciplinary Authority shall produce all documents and the witnesses. The witnesses shall be examined by the Presenting Officer and cross examined by employee or Defence Assistant on behalf of the employee. The Presenting Officer/Defence Assistant/Delinquent employee/intermediary, in presence of Inquiry Authority shall be entitled to re-examine the witnesses.
- o) On the conclusion of the inquiry, the Inquiring Authority shall prepare a report which shall contain the following:
  - i. details of misconduct or misbehaviour.
  - ii. details of the defence and counter.
  - iii. an assessment of evidence in respect of each charge.
  - iv. any other relevant facts, findings and conclusions thereof

**EXPLANATION:**

If, during the proceedings the Inquiring Authority is of the opinion that there is an additional or subsequent charge which was not there at the initial stages of investigation, then the authority may change, amend, alter or add such charges by recording its reasons. This alteration, addition or amendment to the original charge shall be duly communicated to the delinquent employee who shall have opportunity to represent his/her case before a final order is passed against him by the Authority.

### **10.6. Action on the Inquiry Report**

If the Disciplinary Authority is of the opinion that any of the penalties specified below should be imposed on the employee, it shall make an order imposing such a penalty. Also, if the Disciplinary Authority is of the opinion that no penalty is called for, it may pass an order exonerating the concerned employee.

If the Disciplinary Authority disagrees with the findings of the Inquiring Authority on charges or on any one of them, it will record its reasons for such disagreement and decide to conclude the case.

- The Complainant and the Respondent shall not be allowed to bring in any legal practitioner to represent them in their case at any stage of the proceedings before the committee. However, they may be accompanied by a colleague for psychological or emotional support. Such colleague will not be permitted to speak at or otherwise interfere with the proceedings of the IC.
- All efforts should be taken to expedite the process and complete the inquiry as early as possible. The inquiry should be completed within a maximum of 90 days.

## 10.7. Penalties

Without prejudice to any other provisions contained in these rules, any one or more of the penalties may be imposed on any employee, for an act of misconduct or for any other good and sufficient reason.

**i. Minor:**

- a) Caution or warning letter
- b) Change in job responsibilities/roles and/or location change
- c) Deferred increment or incentive for a specific duration
- d) Adversely impacting annual performance rating

**ii. Major:**

- a) Warning recordable in reliving letter
- b) Suspension from employment for a certain period of time
- c) Recovery of full / partial monetary loss caused or likely to be caused to the Company
- d) Recovery/forfeiture of/from pay or gratuity of the whole of or part of any pecuniary loss caused to the Company by negligence or breach of orders or trust.
- e) Withholding of increments
- f) Withholding of promotion
- g) Demoting to the lower grade
- h) Dismissal of Services
- i) Termination

***Dismissal of Services:***

Dismissal of services on account of misconduct can be decided by the Disciplinary Authority in major misconducts. Individual who is dismissed from the services will not be eligible for any notice period pay and will be relieved on an immediate basis post the handover is completed.

***Termination of services:***

Can be done as per the clause(s) mentioned in the appointment letter. In such cases, the employee will be relieved by giving three months' notice or payment of three month's pay and allowance in lieu of notice in such cases.

- a) Of an employee appointed in a temporary capacity otherwise than under a contract or agreement, on the expiration of the period for which he was appointed or earlier in accordance with the terms of his/her appointment.
- b) Of an employee appointed under contract or agreement, in accordance with the terms of such contract or agreement; and
- c) Of an employee on abolition of post.

An employee shall be retired from the services of the company compulsorily before attaining the age of superannuation if: -

- a) He is declared medically unfit.
- b) Becomes incapacitated to work.
- c) Becomes physically or mentally disabled.
- d) Is having adverse service record, is habitually inefficient or is dishonest.

#### **10.8. Communication of the Orders/Notice:**

Every order, notice or other process mode are issued under these rules shall be served in person on the employee concerned or communicated by registered post / courier residential address as provided by employee in HR records notification on official or personal email id and other legally accepted modes of communication.

#### **10.9. Common Proceedings:**

Where two or more employees are concerned in a case, the Disciplinary Authority may make an order that proceedings against all of them may be taken in a common proceeding.

#### **10.10. Suspension:**

- a) An employee may be placed under suspension by the Disciplinary Authority:
  - i. Where a disciplinary proceeding under major penalty against him/her is contemplated or pending or,
  - ii. Where a case against him/her in respect of any criminal offence is under investigation, inquiry or trial.
  - iii. Where in the opinion of the Disciplinary authority, he/she has engaged himself/herself in activities prejudicial to the interest or security of the company.
- b) An employee shall be deemed to have been placed under suspension by an order of the Disciplinary Authority with effect from the date of his/her detention, if he/she is detained in custody, whether on a criminal charge or otherwise, for a period exceeding 48 hours.

#### **10.11. . Leave during Suspension:**

No leave shall be granted to an employee under suspension.

#### **10.12. Subsistence allowance during Suspension:**

An employee who is placed under suspension shall, during the period of suspension, be entitled to receive payment from the company by way of subsistence allowance as per applicable law.

Note: Other components, such as incentive/bonus/annual variable pay/increment will be put on hold until the investigation is completed.

### 10.13. Allowances:

If during the period of suspension, the employee retires by the reason of his /her attaining the age of superannuation/or tenders his/her resignation from services of the Company, no subsistence allowance shall be paid to the employee from the date of his/her retirement.

### 10.14. Pay, Allowances and Treatment of Service on Termination of Suspension:

Where the Disciplinary Authority holds that the employee is fully exonerated or that suspension was unjustifiable the employee shall be granted the full pay to which he/she would have been entitled to together with any allowance of which he was in receipt immediately prior to his/her suspension. In other cases, the employee would be entitled for pay or allowances as decided by Disciplinary Authority but not less than the subsistence allowance as mentioned above.

### 10.15. Appeals:

An employee may prefer an appeal against an order imposing upon him/her any of the penalties or against the order of suspension. The appeal shall lie to the Appellate Authority. An appeal shall be presented within 30 Days from the receipt of the order appealed against him/her. The appeal shall be addressed to the Appellate Authority and submitted to the authority whose order is appealed against. The Appellate Authority may pass an order confirming, enhancing, reducing or setting aside the penalty or remitting the case to then authority which imposed the penalty for retrial.

### 10.16. Authority to relax time limit and to condone delay.

The Competent Authority under the rules to make any order may extend the time specified in these rules or condone any delay for good and sufficient reason.

### 10.17. Competent Authority for placing an employee under Suspension.

The Competent Authority for suspension will be Disciplinary Authority.

### 10.18. The Disciplinary Authority and the Appellate Authority shall be as under

S.No	Name/Category of the Post	Disciplinary Authority	Appellate Authority
1	i. Regional Head & below roles in branches ii. SM II and below roles – CSO	Head– Business HR & Talent Acquisition and Head–Talent Management & Rewards– jointly on final decision	Chief People Officer
2	i. Zonal Heads & above roles – branches ii. AGM/ Head / National Head	Chief People Officer	Managing Director & CEO

3	Functional Head	Managing Director & CEO	Nomination & Remuneration Committee
4	Managing Director & CEO	Nomination & Remuneration Committee	Board of Directors

### 10.19. Roles and Responsibilities

Company's expectations from employees

- i. Comply with the Code of Conduct and policies of the Company and shall not engage in any act/omission resulting in violation of law.
- ii. Maintain effective and professional work relationships with colleagues, visitors, and clients and treat all with dignity and respect.
- iii. Co-operate with their reporting manager, Human Resources, and the Disciplinary Committee, and participate in the disciplinary proceedings as and when required for the resolution of the infractions alleged against them.
- iv. Employee Responsibility
- v. Employees must cooperate fully and promptly in any investigation.
- vi. Where possible, the individuals interviewed will be assured of anonymity and discretion at all stages of the investigation. Further, all the individuals involved in the disciplinary process are required to ensure that confidentiality is maintained throughout the disciplinary action process.
- vii. Publishing/communicating or in any other manner making known to the public, press or media or to any other person who is not authorized to receive, any information in relation to the process, the identity of the employees involved, the investigation and disciplinary proceedings, recommendations of the Disciplinary Committee, is strictly prohibited and appropriate action shall be taken against the defaulting employee.

Manager's Responsibility

- i. Provide appropriate feedback to their team in respect of their conduct.
- ii. Endeavour to resolve the issues initially through informal discussion with the employee.
- iii. The manager shall act promptly upon receipt of a complaint against any employee and where necessary, shall ascertain the veracity of the complaint and its background.
- iv. Issue the necessary communication to the employee, upon finalization of the decision of the Disciplinary Committee and will, along with the HR, be responsible for ensuring that the decision is fully implemented.
- v. Monitor the employee's improvement, or lack thereof, in applying the prescribed corrective action.
- vi. Abide to the managerial/supervisory responsibilities.

## **Annexure 1.1 - ACTS CONSTITUTING MINOR MISCONDUCT**

The following acts may constitute minor offences. The list is illustrative and not exhaustive:

- i. Leave without permission/approval for continuous seven days or absence from the employee's appointed place of work.
- ii. Failure to notify the Company / Management of any change of address.
- iii. Smoking cigarette, chewing tobacco or pan while on duty in office premises.
- iv. Misuse of the furniture or property of the company.
- v. Defacing the walls/building of the work premises.
- vi. Use of equipment / property in ways not permissible.
- vii. Habitual absence or habitually overstaying the sanctioned leave, habitual absence from the employee's appointed place of work without permission or sufficient cause.
- viii. Any breach of the PNB FHL Employees Disciplinary Rules & Conduct or otherwise acting in breach of any law or rules applicable to the establishment.
- ix. Not attending Company stipulated trainings or with lack of sincerity.
- x. Tailgating or sharing access with another person/employee to mark attendance.
- xi. Applying or obtaining leave on false pretext.
- xii. Habitual negligence or gross negligence; signing any official document without doing due diligence.
- xiii. Making indecent gestures or otherwise misbehaving with employees or officers or customers or guests.
- xiv. Preventing any officer or employee from discharging his/her duties towards the Company.
- xv. Refusal by employee to do any work or job given by organisation which concerns the activity of the company.
- xvi. Spreading false rumours or giving false information which tends to disrupt the Company or its employees or spreading panic among the employees.
- xvii. Refusal to accept any order or communication or any kind of in-subordination as communicated by the manager or the organisation.
- xviii. Any conduct on the part of the employee inconsistent or incompatible with the due or faithful discharge of his/her duties towards the Company.
- xix. Any breach of the express or implied or incidental duties of an employee.
- xx. Conduct in private life prejudicial to the reputation of the Company.
- xxi. Preparing false bills or statement of expenditure.
- xxii. Bringing to the work premises inside anything, which is not directly related to the job of the respective employee.
- xxiii. Idling on duty within work premises or neglect of work.
- xxiv. Accept or permit any member or any other person action on his/her behalf to accept any gift.

## **Annexure 1.2 ACTS CONSTITUTING MAJOR MISCONDUCT(S)**

The following acts may constitute major offences. The list is illustrative and not exhaustive:

- i. Inciting other employees to go on or participate in an illegal or unjustified strike or to act in furtherance thereof.
- ii. Malingering, go-slow or slow-down, dharna, picketing, gherao, sabotage or any abetment or instigation thereof, whether as a concerted action by the employees or by an individual employee.
- iii. Indulging in any tactics or strategy having the result of a stay-in-strike, or the like or doing such things as to cause stoppage of work of any section or department.
- iv. Theft, embezzlement, fraud, misappropriation or dishonesty in connection with the business or property of the Company; or of any employee within the premises of the establishment / works.
- v. Taking or giving bribes or any illegal gratification or tips.
- vi. Bringing any political or other outside influence including that of individual directors or members of the Board to bear upon any superior authority to further his/her own interest in respect of matters pertaining to his/her service in the Company.
- vii. Bringing any political or outside influence, publish or threat to publish the information related to any ongoing investigation on any social media platform.
- viii. Breach of any law, rules, regulations and orders applicable to the Company / Management.
- ix. Assault, fighting, riotous or disorderly or indecent behaviour or any act subversive of discipline.
- x. Writing a letter to any superior containing offensive remarks against him.
- xi. Delivering derogatory speeches, inciting employees to misbehave or indulging in any act of intimidation or coercion against any co-employees.
- xii. Use of offensive vile or obscene language with hidden imputation against the Management or any of its officers.
- xiii. False complaint before any authority Restraining and/or confining any officer with a view to making him concede to his/their demands.
- xiv. Refusal to submit for medical examination dishonesty or misuse of funds.
- xv. Deceptive or corrupt practices in connection with the Company's work or business.
- xvi. Contempt of rules or disrespect of authority or general affront to the Company.
- xvii. Refusal to obey transfer orders.
- xviii. Dual employment.
- xix. Any breach of the PNB FHL Employees Disciplinary Rules & Conduct or otherwise acting in breach of any law or rules applicable to the establishment.
- xx. Engage or participate in any demonstration which is prejudicial to the interest of the sovereignty and integrity of Republic of India.
- xxi. Engage in any non-authorized earning related to the organisation; Demand of money/commission from customer, client, colleagues etc.
- xxii. Damaging any of the Company property or tempering with any equipment, articles or any written record including notices put up on the Notice board, falsifying official records, and the like.
- xxiii. Misbehaviour during a domestic enquiry into charges of misconduct or during the pendency of disciplinary action and/or threatening, intimidating, abusing, beating, assaulting, manhandling, or otherwise pressuring or misbehaving with the Enquiry Officer or the

- Presenting Officer or the witnesses, either before the commencement of or during or after the enquiry.
- xxiv. Violation of any Act/Statute applicable to the Company/ Establishment.
  - xxv. Endangering the safety of self or others or endangering the Company's property.
  - xxvi. Furnishing false or incomplete information or suppressing any information regarding name, age, father's name, education, qualifications, ability, previous service, previous salary details, conviction in a Court of Law, dismissal, removal or compulsory retirement by a previous employer or any other matter germane to the employment either at the time of employment or at any time during the course of employment.
  - xxvii. Acting in any manner prejudicial to the interests of the Company/Management.
  - xxviii. Presence or Consumption of any un-authorized toxic substance like drug/alcohol/tobacco/gutka in office or during office hours
  - xxix. Commission of any act, which amounts to a criminal offence involving moral turpitude.
  - xxx. Conviction on any criminal offence and/or sentence to a prison term for a conviction and/or sentence related to a rule or standard regulating conduct in, or of relevance to, the workplace.
  - xxxi. Misappropriation of Company property.
  - xxxii. Distribution or exhibition of any newspaper, handbill, pamphlets, posters or posting any information through internet or short message services via any electronic or internet devices without prior permission in writing of the Management.
  - xxxiii. Disclosure by any employee to any unauthorized person of information relating to the company's business or security measures or communicating directly or indirectly to any outside party any documents or information which has come into his/her possession, or which he has secured knowledge in the course of his/her employment, unless expressly permitted in writing by the Manager.
  - xxxiv. Habitual indebtedness or insolvency.
  - xxxv. Any act or omission leading to loss of confidence in the employee.
  - xxxvi. Aiding, abatement of or incitement to commit any act of misconduct.
  - xxxvii. Non-observance of specified control systems/checks.
  - xxxviii. Misrepresentation.
  - xxxix. Unauthorized use of another employee's password.
    - xl. Unauthorized use and/or negligence in the use of and/or use for purposes not related to the business or job function and/or abuse of internet, e- mail and computer hardware and software facilities.
    - xli. Making false reports or making false entries on any official company documents or records.
    - xl.ii. Gross insubordination or blatant disrespect to management or clients.
    - xl.iii. Intentional interfering with or obstructing other employees in the performance of their duties.
    - xl.iv. Transmitting the company's business transactions or mails received on official e mails to own personal e mails.
    - xl.v. Unauthorised soliciting or collecting contributions for any purpose whatsoever on company premises.
    - xl.vi. Intimidation.
    - xl.vii. Fraud.
    - xl.viii. Bribery.
    - xl.ix. Dishonesty.
      - l. Assault.
      - li. Threatening behaviour.



- ii. Any misconduct constituting breach of contract under the common law or any other legal provisions.
- liii. Any Act subversive of discipline
- liv. `Sexual Harassment' which means and includes such unwelcome sexually determined behaviour (whether directly or by implication) as.
  - a. Physical contact or advances.
  - b. A demand or request for sexual favours.
  - c. Sexually coloured remarks.
  - d. Showing pornography.
  - e. Any or other unwelcome physical, verbal or non-verbal conduct of sexual nature.
  - f. Indulging in or abatement of any act of Sexual harassment within the company premises

Note: Any exception to the type of misconduct (minor/major) whether to conduct a proper enquiry or not basis the artifacts available can be decided by Disciplinary Authority (case to case basis).