

ENVIRONMENTAL, SOCIAL AND GOVERNANCE (ESG) POLICY

1. Premise:

Business Responsibility & Sustainability Reporting is an emerging discipline encompassing the disclosure of an entity's non-financial environmental, social, and governance (ESG) performance and its overall impact. The stakeholders are becoming more vocal and aware of the need for corporate responsibility for social and environmental issues like climate change, gender equality, environmental degradation, etc.

According to the disclosure requirement of "National Voluntary Guidelines on Social, Environmental, and Economic Responsibilities of Business" (NVGs) in 2012, the Securities and Exchange Board of India (SEBI) mandated the top 100 listed entities by market capitalization to file Business Responsibility Reports (BRR) as part of their annual report. Later, in 2015, the top 500 listed businesses by market capitalization were required to file BRRs, and in 2019, the top 1000 listed entities were required to do so.

The National Guidelines on Responsible Business Conduct (NGRBCs) were subsequently released in March 2019 as a result of the NVGs' revision. In 2020, the Ministry of Corporate Affairs' Committee on Business Responsibility Reporting recommended changing the name of the Business Responsibility Report to the Business Responsibility and Sustainability Report (BRSR) in order to more accurately reflect the scope of the reporting requirements. The Business Responsibility and Sustainability Report (BRSR) is a new reporting requirement introduced by SEBI in May 2021 for sustainability reporting by listed firms with the aim of providing quantitative, qualitative, and standardized disclosures on ESG parameters. The BRSR is a significant step in the direction of parity between financial and sustainability reporting.

With effect from the financial year 2022–2023, SEBI mandated the filing of Business Responsibility and Sustainability Reports (BRSR) in place of the current BRR for the top 1000 listed businesses (by market capitalization). The disclosures from listed entities as per BRSR relate to their performance against the nine principles of the 'National Guidelines on Responsible Business Conduct' (NGBRCs).

The SEBI's adoption of the BRSR requirement marks a turning point in the Indian sustainability reporting landscape and gives organizations the chance to integrate sustainability into their core business strategies. Additionally, by encouraging stakeholders to consider factors other than finances, such as social and environmental implications, such disclosures will help organizations interact with their stakeholders in more meaningful ways. Also, businesses will be better able to articulate their sustainability goals, positioning, and performance, leading to the development of long-term value.

2. About Company:

Repc Home Finance Limited (RHFL/Company) is incorporated under Companies Act, 1956 and registered with National Housing Bank (NHB) as Housing Finance Company. The equity shares of the company are listed in National Stock Exchange (NSE) and BSE Limited.

The company provides financing for unbanked, and underserved communities who, despite having a consistent source of income, are unable to obtain credit because they lack the necessary documentation to prove their income. The goal of the company is to help these individuals realize their dream of home ownership, and over the years, the company has established itself as the go-to company for first-time homebuyers in urban and semi-urban areas of India. The Company is

assisting unbanked communities to establish formal credit in this way. The business strategy is based on the idea of influencing how people will finance houses in future and enabling them to live better lives. The company is not into manufacturing-related activities and water consumption is restricted to personal usage of employees only.

The company has been transparent in corporate governance by making the necessary disclosures. Since the beginning of the journey, adherence to the governance norms has served as the foundation for the growth due to which the company constantly drew the interest of investors from throughout the world.

The company believes that growth in the business can be achieved sustainably while also respecting the environment and its ecosystem. The company strives to align the ESG with its strategic objectives. The Company's attempt to align its business strategy, operations, and disclosures with ESG standards and frameworks are described in this policy framework.

3. Objective

The ESG Policy's objective is to express the Company's commitment to environmental, social, and ethical governance practices as well as long-term value creation for the Company's internal and external stakeholders, including customers, employees, investors, regulators, business partners, community members, etc. The policy will also help in guiding the company to provide an inclusive, safe, and healthy working environment and promote the well-being of all stakeholders.

4. Applicability

The ESG policy is applicable to all employees of the company and the relevant stakeholders.

5. Policy statement:

The Company is committed to ESG principles and will do the following:

- i. Engage fairly with all stakeholders.
- ii. Continue to maintain high standards of Corporate Governance.
- iii. Comply with all applicable statutory rules and regulations.
- iv. Prohibit discrimination against any employees based on gender, caste, race, age, color, religion, belief, disability, sexual orientation, marital status, etc.
- v. Supporting eco-friendly initiatives and working to advance a sustainable environment
- vi. Ensuring that policies and procedures complement the company's long-term sustainability and its ideas.
- vii. Upholding high standards of social and ethical behavior in the operations of the company.
- viii. Continue to provide employees with a fair, healthy, and secure working environment.

6. ESG Governance

The company relies on the collective knowledge of the entire board of directors of the Company for the implementation of ESG norms and BRSR. The Audit Committee will oversee and monitor the ESG norms & BRSR.

The ESG will be directly supervised by the Managing Director & Chief Executive Officer (CEO) of the Company and he may appoint/nominate officials for ESG execution for managing the affairs in this regard. The Managing Director & Chief Executive Officer will be authorized to take all necessary actions/decisions for the effective implementation of this policy and ESG norms.

Roles & Responsibility of the Audit Committee:

- Develop ESG Policy
- Identify the roles and responsibilities of each of the stakeholders
- Finding ways to reduce emissions, energy use, water security, waste management, and the use of renewable energy sources; and setting goals for progress in these areas

- Timely implementation of ESG norms in the company
- Identifying business opportunities to make products and services more inclusive.
- Addressing concerns on environment protection and climate risk

7. KEY FOCUS AREAS FOR ESG

7.1 Environmental sensitivity in the Company's operations

The Company will manage its operations effectively, efficiently, and sustainably, while minimizing its environmental impact. The company hopes that its investment in the digitization project, will reduce the need for paper, speed up turnaround times, and enable clients to engage with the company digitally as well through app in addition to the branches, SAT centre, website.

7.2 Climate Change

The Company will use energy-saving equipment and lighting in its workplaces to conserve electricity wherever possible. The company will make efforts to implement an efficient and environment-friendly waste disposal system including e-waste. The company will promote the judicious usage of paper and discourage the usage of plastic.

7.3 Good Governance Practices

The Company will uphold integrity, business responsibility, and compliance. The good governance procedures have been actively upheld by the company and will endeavor to make continuous improvements to raise the Governance standards. Setting the direction for and assessing the Company's performance with regard to corporate governance is under the purview of our Board of Directors. The company adheres to fair play principles by conducting business ethically.

7.4 Customers

The company intends to provide the best services to its customers. The company is having a Customer Grievance Redressal Policy which prescribes the guideline for addressing issues raised by the customers and the company will adhere to the policy.

7.5 Women Safety

The Company is committed to a safe workplace for women and have zero tolerance for sexual harassment. Any complaint under The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 shall be dealt through the prescribed processes.

7.6 Non-Discrimination & Fair Treatment:

The company's long-term performance depends heavily on employee contentment. There shall be no discrimination against employees based on their gender, caste, race, age, color, religion, belief, disability, sexual orientation, marital status, etc. The company offers fair and equal employment and promotion opportunities to all of its employees. The company will continue to foster safe and conducive working conditions for its employees. The policy governing equal employment opportunities at the company is included as Annexure-I.

7.7 Employee Ethics & Code of Conduct:

The Company is having a Disciplinary Policy and Procedures and also the employees are governed by it. The Anti-bribery, Anti-Corruption and Ethical Policy of the company is enclosed are Annexure- II.

7.8 Responsible Advocacy

Through its operations, which are based on the principles of honoring human life and tackling environmental problems in the best possible way, the company is dedicated to making a positive impact wherever possible. In order to support the country's collective transition to a low-carbon economy, the Company will align with national goals and targets. The company has a policy on responsible advocacy, which is enclosed as Annexure-III, that outlines the standards to be adhered to by employees, partners, and associates while engaging in advocacy activities with internal and external stakeholders.

7.9 Training & Development:

The company believes that its employees as its most valuable resource, it has always made sure to promote their overall growth through consistent training initiatives. The Human Resources Department will ensure that based on the requirement suitable training in behavioral and functional skills is imparted to the employees.

7.10 Stakeholder engagement and accountability

The company believes in open communication with all of its stakeholders and engages in frequent interaction with them, including regulators, customers, employees, and investors. The Company will continuously work to improve its ESG processes and disclosures, with a particular emphasis on the important issues as and when identified by stakeholders. The Company has established a Whistle Blower Mechanism to facilitate reporting of any unethical functioning. The company will conduct its operations in a way that promotes the rights and dignity of every person while also making sure that all relevant legal obligations are met. The company will take prompt corrective action in the event of any actual or potential violations of the company code, regulations, or laws, including those involving violations of human rights. The stakeholder management policy is provided in Annexure IV.

7.11 Society

As a provider of financial services, it will continue to facilitate access to financing for socially underprivileged parts of society. Wherever feasible the Company shall contribute towards improving the lives of disadvantaged groups in society, guided by the values of inclusivity and equal opportunity. Also, the company will continue to work to improve the lives of socially and economically disadvantaged groups through its CSR initiatives. The attempt will be made by the Company that suppliers do not engage in any activities that are related to violation of human rights, child labor or forced labor. The Human Rights Policy is listed in Annexure V.

8. ESG REPORTS

The "Business Responsibility and Sustainability Report" (BRSR), a reporting format required by SEBI, tries to create connections between a company's financial success and ESG performance. This can make it simpler for regulators, investors, and other related stakeholders to get an accurate assessment of the overall stability, growth, and sustainability of the business. The company will publish the BRSR report as required under regulatory requirements.

9. Other policies under ESG

The ESG policy also includes the following policies which are enclosed are Annexures:

- i. Equal Employment Opportunity Policy - Annexure I
- ii. Anti-Bribery, Anti-Corruption and Ethical Policy - Annexure II
- iii. Responsible Advocacy Policy - Annexure III
- iv. Stakeholder Management Policy - Annexure IV
- v. Human Rights Policy - Annexure V
- vi. Supplier Code of Conduct - Annexure VI
- vii. Health And Safety Policy - Annexure VII
- viii. Environmental Management Policy - Annexure VIII

10. REVIEW

This policy shall be reviewed from time to time based on the business, operational or regulatory requirements of the company but not later than the 3 years from the date of the Board's approval. In case of any inconsistency between the policy and the applicable regulatory provision, the regulatory provision shall prevail.

11. RULE

This policy aims to create a strategic overview for the functioning of the company and wherever required the Managing Director & CEO is authorized to frame rules for the effective implementation of this policy.

EQUAL EMPLOYMENT OPPORTUNITY POLICY

Introduction:

Repro Home Finance Limited (RHFL/Company) is incorporated under Companies Act, 1956 and registered with National Housing Bank (NHB) as Housing Finance Company. The equity shares of the company are listed in National Stock Exchange (NSE) and BSE Limited. The company offers financial services to its customers to fulfil their housing needs.

The Company, being a private establishment within the meaning of Section 2(v) of the Rights of the Persons with Disabilities Act, 2016 (RPWD Act) and rules thereunder, aims to create employment at all levels without any discrimination whatsoever.

The Company has been providing equal employment opportunities without any discrimination on the grounds of age, color, disability, race, caste, sex, and religion.

Applicability:

This Policy is applicable to the employees of the company.

System and Processes for persons with disabilities:

The Company shall ensure that the following systems and processes are in place:

1. To treat differently-abled persons equally with its other employees, to provide appropriate facilities and amenities to persons with disabilities (PWDs) to enable them to effectively discharge their duties in the establishment.
2. To identify the posts suitable for persons with disabilities in the Company and to place them at such functions wherein they can conveniently attend and discharge their duties.
3. To give equal opportunity to persons with disabilities, if found suitable, at all stages of employment in the Company, including recruitment, selection, and promotion.
4. A column in the application form may be included seeking information if the applicant is a person with a disability and if so, the nature of the disability and specific needs, if any.
5. Wherever required, the training programs from time to time for the upgradation of the skill of persons with disabilities with regard to their employment may be given.
6. To provide preference in transfer and posting, subject to their suitability and availability. The exemptions from mandatory serving/compulsory transfers as per HR policy shall also be looked into, keeping in view the convenience of persons with disabilities & administrative exigencies.

Appointment of Liaison Officer by the Company:

The Managing Director & CEO shall appoint a Liaison officer and to designate him/her to oversee the provision of required facilities/amenities, including the process of recruitment for persons with disabilities.

The above Liaison Officer shall be the Grievance Redressal Officer for the purpose. He/she shall be the designated authority to oversee the provision of required facilities/amenities including the process of recruitment of persons with disabilities.

The Managing Director & CEO shall be the final Authority and his decisions will be binding on the Issues/matters relating to PWDs.

This Policy along with the required details of the Liaison Officer shall be displayed on the website or at

any conspicuous place in the Corporate Office premises.

Responsibility

Every employee of the Company is responsible to give effect to this policy. If any employee violates this Policy, or discriminates against any person with disability, or renders any harassment to such person, disciplinary proceedings shall be initiated against such employee.

Maintenance of record

The Company shall maintain records of the persons with disabilities in relation to matters of employment, facilities provided, and other necessary information in compliance with the provisions of this policy and all such records as may be prescribed under RPWD Act from time to time.

Review

This policy shall be reviewed from time to time based on the business, operational or regulatory requirements of the company but not later than the 3 years from the date of the Board's approval. In case of any inconsistency between the policy and the applicable regulatory provision, the regulatory provision shall prevail.

Rule

This policy aims to create a strategic overview for the functioning of the company and wherever required the Managing Director & CEO is authorized to frame rules for the effective implementation of this policy.

ANTI-BRIBERY, ANTI-CORRUPTION, AND ETHICAL POLICY

The Anti-bribery, Anti-Corruption and Ethical Policy ("Policy") of Repco Home Finance Limited (RHFL/Company) emphasizes zero tolerance towards bribery and corruption malpractices and reflects its commitment to maintaining the highest ethical standards undertaking open and fair business culture, following the best practices of corporate governance.

The Policy is applicable to all stakeholders, or any other person associated with RHFL such as directors, employees (whether, permanent contractual, or temporary), consultants, contractors, trainees, casual workers, agency staff, interns, agents, business partners, vendors, service providers, suppliers, who may be acting directly or indirectly on behalf of RHFL.

Bribes or illegal gratifications made in the form of money or anything of value, in return to a person holding a position of authority, for a business favor or advantage is strictly prohibited and in case any relevant stakeholder is found guilty of such act then suitable action will be initiated against the concerned stakeholder.

The following shall be adhered to:

1. Conduct business lawfully and ethically.
2. Every stakeholder shall perform their role and responsibility with utmost integrity.
3. All forms of bribery and corruption practices are prohibited.
4. Prohibition of giving or accepting any kind of favors to facilitate or expedite official business or work.
5. RHFL may make charitable donations that are legal and ethical as per rules, powers, and practices, duly ensuring that the charity or support is for a legitimate cause and the donations are not being used as a channel for bribery.
6. Stakeholders must not use RHFL's name or trademark for political activities of any kind or provide money or other forms of support to political parties on behalf of RHFL.

An illustrative list of practices that are prohibited under this Policy shall include but not limited to:

1. Dishonest misappropriation of property/money, criminal breach of trust, and cheating, as defined under Indian Penal Code.
2. Receiving or giving bribes.
3. Acceptance/giving of gifts over and above the extent and the manner as may be provided under the Company Rules and Regulations.
4. Charity in order to obtain commercial advantages.
5. Any other unethical act or omission.

All stakeholders are encouraged to raise concerns about any issue or suspicion of non-compliance with this Policy. The company will investigate all allegations relating to corruption and Bribery and take legal/disciplinary action as may be deemed appropriate. However, the concerns expressed anonymously/pseudonymously shall not be investigated. Further, no official/department shall take cognizance of such anonymous complaints.

This policy shall be reviewed from time to time based on the business, operational or regulatory requirements of the company but not later than the 3 years from the date of the Board's approval. In case of any inconsistency between the policy and the applicable regulatory provision, the regulatory provision shall prevail.

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RESPONSIBLE ADVOCACY POLICY

With the aim of influencing policy, regulations, and other decision-making processes, advocacy refers to the activities carried out when interacting with a wide range of stakeholders, including government agencies, non-governmental organizations, academic and research institutions, associations at local, national, and international levels, and individuals.

Repc Home Finance Limited (RHFL/Company) considers it essential to speak for and interact with authorities on issues pertaining to the numerous industries in which it operates. The ideals of commitment, integrity, and transparency, as well as the necessity to balance the interests of many stakeholders, serve as the foundation for the company for interactions with the appropriate authorities.

The Policy on Responsible Advocacy specifies the following critical and necessary guidelines to be followed by all employees, relevant contractors engaged by RHFL, and all partners & associates in all advocacy activities with internal and external stakeholders:

1. Achieve complete compliance with all applicable regulations pertaining to advocacy activities with the Government, non-governmental organizations, industry associations, and individuals.
2. Focus on transparency, accountability, strong corporate governance standards, and ethical guiding principles in all advocacy interactions.
3. Strengthen public advocacy principles by seeking alignment with the appropriate national and international transparency, accountability, and ethical code of conduct frameworks
4. Ensure adherence to anti-corruption policy in all stakeholder interactions and implement record management tools
5. Undertake appropriate disciplinary action against any proven instance of non-compliance with this policy.

This Policy applies to all Board Members of RHFL, employees of RHFL, and contractors of RHFL when acting on behalf of the company such as agents, public affairs, communications and legal consultants, outsourced personnel, and other third-party representatives.

This policy shall be reviewed from time to time based on the business, operational or regulatory requirements of the company but not later than the 3 years from the date of the Board's approval. In case of any inconsistency between the policy and the applicable regulatory provision, the regulatory provision shall prevail.

This policy aims to create a strategic overview for the functioning of the company and wherever required the Managing Director & CEO is authorized to frame rules for the effective implementation of this policy.

Stakeholder Management Policy

Repc Home Finance Limited (RHFL/Company) acknowledges that effective stakeholder management is a crucial element of the business operations to be carried out at each level. It is an important mechanism to understand stakeholders and their needs, involve them in managing risks, and resolving conflicts at an early stage.

The Stakeholder Management Policy is applicable to all stakeholders, or any other person associated with RHFL such as directors, employees (whether, permanent contractual, or temporary), consultants, contractors, trainees, casual workers, agency staff, interns, agents, business partners, vendors, service providers, suppliers, who may be acting directly or indirectly on behalf of RHFL.

The company should ensure effective Stakeholder Management:

1. Maintaining positive legal compliance to applicable stakeholder engagements.
2. Determining the nature of the impact on stakeholders, their legitimate concerns, interests, and expectations as well as their potential influence on the company.
3. Integrating the value of inclusiveness, transparency, materiality, completeness, and cultural appropriateness in all our engagement activities.
4. Timely disclosure as prescribed under the regulatory guidelines.
5. Resolving stakeholder grievances in a time-bound manner.

Undertaking engagement in a non-discriminatory and interactive manner that encourages stakeholders to provide feedback and engage positively with the business operations.

This policy shall be reviewed from time to time based on the business, operational or regulatory requirements of the company but not later than the 3 years from the date of the Board's approval. In case of any inconsistency between the policy and the applicable regulatory provision, the regulatory provision shall prevail.

This policy aims to create a strategic overview for the functioning of the company and wherever required the Managing Director & CEO is authorized to frame rules for the effective implementation of this policy.

HUMAN RIGHTS POLICY

As one of its core values, Repco Home Finance Limited (RHFL/Company) supports, protects, and promotes human rights and ensures that fair, ethical business and employment practices are followed.

The company is committed to compliance with all applicable employment, labor, and human rights laws.

This policy is applicable to all stakeholders of the company, including directors, employees (whether permanent, contractual, or temporary), business partners, vendors, suppliers, consultants, trainees, direct selling agents, or any other person/entity acting for and on behalf of the company.

This policy emphasizes that the company does not support breaches of or abuses of human rights and lays out the broad framework to ensure that all stakeholders are treated with the highest respect and dignity.

The company is committed to maintaining a safe, harmonious business environment and workplace for everyone, irrespective of caste, region, gender, religion, disability, qualifications, background, etc. The company advocates that the workplace should be free from violence, harassment, intimidation, and/or any other unsafe or disruptive conditions, either due to external or internal threats. Accordingly, the company will strive to provide reasonable safeguards for the benefit of employees while having due regard for their privacy and dignity.

The company prohibits all forms of slavery, coerced labor, child labor, human trafficking, physical/sexual violence, etc.

It is crucial to safeguard a company's name, reputation, and trust as an organization that upholds and defends human rights. Any employee or other stakeholder who violates the practice of humanity is likely to face appropriate disciplinary or punitive action.

This policy shall be reviewed from time to time based on the business, operational or regulatory requirements of the company but not later than the 3 years from the date of the Board's approval. In case of any inconsistency between the policy and the applicable regulatory provision, the regulatory provision shall prevail.

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Supplier Code of Conduct

All "Suppliers" that have a business relationship with Repco Home Finance Limited (RHFL/Company) and/or intend to do so are subject to the Supplier Code of Conduct outlined in this document. The term "Supplier" in this context refers to vendors, service providers, dealers, agents, consultants, as well as their staff members, and other representatives. The fundamental standards that we expect our Suppliers to accept and abide by when doing business with the company are briefly outlined in this Code.

Health and Safety

In order to ensure compliance with both general health and safety regulations as well as standards and rules relevant to their industry, all suppliers must have in place effective health and safety management systems that are appropriate for the type and scope of their business and the goods, works, or services they supply. Suppliers operating on our premises are required to adhere to our health and safety requirements. If deemed appropriate, the company may audit this compliance in order to promote ongoing development.

Human Rights

All of our Suppliers are required to abide by all local, state, and national labor laws as well as laws protecting human rights. We expect that all businesses associated with us respect their employees and provide a secure work environment free from harassment, intimidation, and fear. We are committed for supporting equitable opportunities for all of our workers, clients, and vendors. All of our suppliers must treat everyone fairly, respectfully, and with dignity. We do not discriminate against anyone and we do not accept it on the basis of age, color, disability, ethnicity, gender, religion, or any other illegitimate or unjustified basis.

Environment

To get and use resources sustainably, to reduce and adapt to climate change, to prevent pollution, and to maintain and enhance biodiversity, we acknowledge that a considerable change in business practices is required. We encourage our Suppliers to present ideas that strengthen our operations' resilience while also being aware of how their own companies must adjust to a changing environment.

Community

We expect Suppliers to have an understanding of how their activities impact their local area and the wider community. We encourage them to make positive contributions towards local employment opportunities, workforce volunteering, and charitable activities as well as minimizing disruption to communities.

Business ethics and governance

All of our Suppliers are obligated to abide by all laws and regulations that may be in force. All of our Suppliers shall never, directly or indirectly, offer or accept any unauthorized remuneration or other compensation with the intent of persuading a person or entity to violate their legal obligations. The Supplier shall not seek or maintain a business or other advantage from a third party, whether public or private, including with any employee of the company, directly or through intermediaries, or engage in any unethical behavior (implicit or explicit), or offer or promise any personal or improper advantage.

HEALTH AND SAFETY POLICY

Repc Home Finance Limited (RHFL/Company), firmly believes that health and safety are fundamental parts of our activities, policies, processes, and business operations. The company is committed to providing a safe and healthy workplace to its employees, as well as to the relevant stakeholders, at all of our operational locations.

The company recognizes that Health & Safety and the overall well-being of its employees are vital to its success and growth aspirations. It is our conviction to promote the conducive working environment so that every activity is performed in a safe manner which facilitates the continual growth and sustainability of our business.

This policy outlines the measure which the Company shall endeavor to take:

1. Integrate Health & Safety aspects in every business decision we make and in every activity we perform.
2. Leaders at all levels, demonstrate their personal commitment to health and safety.
3. Comply and exceed applicable legal and regulatory health and safety requirements and set the highest standards for positive safety compliance, wherever we operate.
4. Develop skills, knowledge, and competence and build capability by engaging employees, business partners, and service providers through appropriate education and training to help them work safely.
5. Ensure a safe place to work by identifying, assessing, and reducing risks & vulnerabilities.
6. Provide adequate resources to ensure continual improvement of health and safety.

Every employee of the Company is responsible to give effect to this policy. If any employee violates this Policy or discriminates against any person with a disability, or renders any harassment to such person, disciplinary proceedings shall be initiated against such employee.

This policy shall be reviewed from time to time based on the business, operational or regulatory requirements of the company but not later than the 3 years from the date of the Board's approval. In case of any inconsistency between the policy and the applicable regulatory provision, the regulatory provision shall prevail.

This policy aims to create a strategic overview for the functioning of the company and wherever required the Managing Director & CEO is authorized to frame rules for the effective implementation of this policy.

ENVIRONMENTAL MANAGEMENT POLICY

Scope and Objective

This policy covers the operations of Repco Home Finance Limited (RHFL/Company). We shall engage our employees, customers, and relevant stakeholders to encourage environment-friendly practices across our company.

Purpose

The objective is to better manage these impacts such that, the risks to the environment, our stakeholders and our operations are minimized. This policy will serve as a framework for understanding and managing our environmental risks, impacts, and opportunities.

Environment Management Policy Statement

The company is committed to reducing any negative impact on the environment causing through its operations. The company will create awareness of environmental protection, climate change risk mitigation, and compliance among employees, customers, and other stakeholders. The company should promote the stewardship of natural resources, eco-friendly livelihoods, green enterprises, local economic ecosystems, etc., in line with the Sustainable Development practices for an inclusive society.

Policy Commitments

To comply with all the environmental and legal requirements within the Company so as to preserve and enhance bio-diversity and strive towards an 'eco-friendly' approach in our infrastructure, processes, operations, use of materials, and solutions.

To increase the awareness levels among the beneficiaries for behavior change.

To recognize the need to work closely for Energy Management, and Waste management and thus will continue to work towards greater integration of environmental factors in our procurement practices.

Awareness and Employee Engagement

The Company understands that its employees and customers can play a major role in reducing the Company's environmental impact. The Company will engage employees and encourage them to adopt environmentally friendly practices. The Company shall also endeavor to create awareness among employees and customers regarding various initiatives, products, and services of the company which have a positive environmental impact.

Review

This policy shall be reviewed from time to time based on the business, operational or regulatory requirements of the company but not later than the 3 years from the date of the Board's approval. In case of any inconsistency between the policy and the applicable regulatory provision, the regulatory provision shall prevail.

Rule

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Prevention of Sexual Harassment in Workplace Policy

A. **Introduction:**

This Policy is framed in accordance with the provisions of ‘The Sexual Harassment of Women at Workplace Act, 2013’ and the rules framed thereunder. Any clarifications pertaining to the policy, reference shall be made to the Act and rules enacted by the Government of India.

We as a Company promote Gender equality among our employees and will not tolerate or entertain any form of harassment or discrimination of women who are employed permanently or for a probationary period or on a contract basis.

The Policy on Prevention of Sexual Harassment of Women at Workplace intends to provide protection against sexual harassment of women at the workplace and prevention and redressal of complaints of sexual harassment and matters related to it.

B. **Scope and Coverage:**

This policy is applicable to all Employees of the Company. This policy considers the right to life with dignity and the fundamental right to carry on any occupation, trade or profession, which depends on the availability of a safe working environment where women employees feel secure and truly believe that their dignity is maintained.

All such acts which come under the definition of sexual harassment shall be covered under this policy and all inquiries shall be tried at Corporate Office.

C. **Definitions:**

1. **Sexual Harassment:** It includes any one or more of the following unwelcome acts or behavior (whether directly or by implication) namely:
 - a. Physical contact and advances; or
 - b. A demand or request for sexual favors; or
 - c. Making sexually colored remarks; or
 - d. Showing pornography; or
 - e. Any other unwelcome physical, verbal or non-verbal conduct of sexual nature.
 - f. Physical contact and advances such as touching, stalking, sounds which have explicit and /or implicit sexual connotation/overtone, molestation.
 - g. Display of pictures, signs etc. with sexual nature/ connotation/ overtones in the work area and work-related areas.
 - h. Verbal or non-verbal communication which offends the individual’s sensibilities and affects her/his performance and has sexual connotations/overtone/ nature.
 - i. Teasing, innuendos and taunts, physical confinement and /or touching against one’s will and likely to intrude upon one’s privacy.
 - j. Any other act as be prescribed under the provisions of ‘The Sexual Harassment of Women at Workplace Act, 2013’ read with rules made thereunder.

The following circumstances, among other circumstances, if it occurs or is present in relation to or connected with any act or behavior of sexual harassment may amount to sexual harassment

- i. Implied or explicit promise of preferential treatment in employment.
 - ii. Implied or explicit threat or detrimental treatment in the employment.
 - iii. Implied or explicit threat about the present or future employment status.
 - iv. Interference with the work or creating an intimidating or offensive or hostile work environment.
 - v. Humiliating treatment which is likely to affect health or safety.
 - vi. An alleged act of Sexual Harassment committed during office hours falls under the purview of this policy.
 - vii. Any other circumstances act as be prescribed under the provisions of The Sexual Harassment of Women at Workplace Act, 2013.
2. **Aggrieved woman:** In relation to a workplace, a woman, of any age, whether employed or not alleges to have been subjected to any act of sexual harassment by the respondent.
 3. **Respondent:** A person against whom the aggrieved woman has made a complaint under section 9 of The Sexual Harassment of Women at Workplace Act, 2013 read with rules made thereunder.
 4. **Employee:** A person employed at the workplace, for any work on a 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 coworker, a contract worker, probationer, trainee, apprentice or by any other such name.
 5. **Workplace:** In addition to the place of work (Registered Officer/Corporate/Branch offices/SAT Centre) it shall also include any place where the aggrieved woman or the respondent visits in connection with his/her work, during the course of and/or arising out of employment/ contract/ engagement with the company. It will also cover all places as may be defined in The Sexual Harassment of Women at Workplace Act, 2013.
 6. **Employer:** A person responsible for management, supervision, and control of the workplace. For the purpose of this definition, the employer of the Company shall be the Managing Director & CEO.

D. Internal Complaint Committee:

1. The Managing Director & CEO of the Company shall constitute an Internal Complaint Committee (ICC). The ICC shall comprise the following:
 - a. Presiding Officer who shall be a woman employed at a senior level at workplace from amongst the employees.
 - b. 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
 - c. one member from amongst non-governmental organizations or associations committed to the cause of women or a person familiar with the issues relating to sexual harassment.
 - d. at least one-half of the total Members so nominated shall be women.
2. The honorary sitting fees may be paid to external member of ICC as may be decided by Managing Director & CEO from time to time. In addition to the sitting fees, the expenses related to attending meeting including travel, accommodation, etc. will be borne by the company.

E. Procedure of Lodging the Complaint:

- I. The complainant needs to submit a detailed complaint, along with any documentary evidence available or names of witnesses, if any, to any of the committee members at the workplace.
- II. The complaint must be lodged within 3 months from the date of incident/last incident. The Committee can extend the timeline by another 3 months for reasons recorded in writing, if satisfied that these reasons prevented the lodging of the complaint.
- III. Provided that where such a complaint cannot be made in writing, the Presiding Officer or any Member of the Internal Complaint Committee shall render all reasonable assistance to women for making the complaint in writing.
- IV. If the Aggrieved Individual is unable to make a complaint on account of her mental or physical incapacity, a complaint may be filed by:
 - a. her relative or friend; or
 - b. her Special Educator; or
 - c. a qualified psychiatrist or psychologist; or
 - d. the guardian or authority under whose care she is receiving treatment or care; or
 - e. any person who has knowledge of the incident jointly with her relative or friend or a special educator or qualified psychiatrist or psychologist, or guardian or authority under whose care she is receiving treatment or care;
- V. If the Aggrieved Individual for any other reason is unable to make a complaint, a complaint may be filed by any person who has knowledge of the incident, with her written consent.
- VI. If the Aggrieved Individual is dead, a complaint may be filed by any person who has knowledge of the incident, with the written consent of her legal heir.

F. Conciliatory Proceedings:

Based on the severity of the situation and on the request of the women, conciliatory proceedings can be initiated and if such a settlement is arrived at, then the same shall be reported to the Managing Director & CEO and the copies of the settlement shall be provided to both the parties and no further inquiry shall be initiated.

If the respondent is not complying with the terms of settlement that were arrived at, then ICC shall proceed with the inquiry or could forward the complaint to the police.

A copy of the findings and opportunity to be heard shall be made available to both parties.

G. Manner of Inquiry into Complaint:

- I. Complainant should submit the complaint along with supporting documents and the names of the witnesses. The complaint should be submitted in six copies.
- II. Upon receipt of the complaint, the committee should send 1 copy of the complaint to respondent within 7 working days.
- III. Respondent shall reply with all supporting documents within 10 working days of receiving the copy of the complaint.
- IV. No legal practitioner can represent any party at any stage of the inquiry procedure.
- V. The Committee shall inquire into the complaint in accordance with the principles of natural justice.
- VI. In conducting the inquiry, a minimum of three committee members including the Presiding Officer should be present.

- VII. All proceedings of the Committee will be recorded in writing. The Committee and individuals shall endorse their respective statements as a token of authenticity. In case of refusal to endorse the same by either party, the endorsement shall be made by the presiding officer with appropriate remarks.
- VIII. The Complaints Committee shall have the right to terminate the inquiry proceedings or to give an ex-parte decision on the complaint, if the complainant or respondent fails, without sufficient cause, to present herself or himself for three consecutive hearings convened by the Chairperson or Presiding Officer, as the case may be. Provided that such termination or ex-parte order may not be passed without giving a notice in writing, fifteen days in advance, to the party concerned.
- IX. The inquiry will be governed by the provisions of The Sexual Harassment of Women at Workplace Act, 2013 and the rules made thereunder.

H. Interim Relief to the Aggrieved Woman:

During the pendency of the inquiry, on a written request made by the complainant, the committee may recommend to the Managing Director & CEO to Transfer the complainant or the respondent to any other workplace or Grant leave to the aggrieved woman or Prevent the respondent from assessing the complainant's work performance or Grant such other relief as may be appropriate.

Once the recommendations of interim relief are implemented, the Managing Director & CEO will inform the committee regarding the same.

I. Penalty awarded to the Respondent:

If the committee arrives at a conclusion that the allegation against the respondent has been proven, the committee shall recommend the Managing Director & CEO to take action for sexual harassment as misconduct.

J. Action Taken on false or malicious Complaints:

In case the Committee 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, it may be recommended to the Company to take suitable action against the Complainant who has made such a frivolous complaint, in accordance with the provisions of the applicable service rules or as prescribed under applicable law.

Mere inability to substantiate a complaint or provide adequate proof need not attract action against the Complainant. Further, the malicious intent on part of the Complainant needs to be established through the inquiry process before any action against such Complainant is recommended by the ICC to the Company.

K. Duties of the Employer:

- i. Provide a safe working environment at the workplace which shall include safety from the persons coming into contact at the workplace.
- ii. Display at any conspicuous place in the workplace the penal consequences of sexual harassment, and the order constituting the ICC.
- iii. Declare names and contact details of all members of the ICC.
- iv. Organize workshops and awareness programs at regular intervals for sensitizing the employees with the provisions of the Act and orientation/capacity building programs for the members of the ICC.
- v. Provide necessary facilities to the ICC for dealing with the complaint and conducting an inquiry.

- vi. Assist in securing the attendance of the respondent and witnesses before the ICC and make available such information to the ICC in the context of the complaint.
- vii. Provide assistance and initiate action to the aggrieved person if they so choose to file a complaint against the respondent in relation to the offense under the Indian Penal Code or any other law for the time being in force.
- viii. Treat sexual harassment as misconduct under the code of conduct and initiate action for such misconduct.
- ix. Monitor the yearly submission of the annual reports by the ICC to the Managing Director & CEO and to the District Officer with regard to the number of cases filed if any, and their disposal under the Act.
- x. Management on the recommendation of the complaints committee and/or the HR department may seek appropriate expert advice and arrange for help and support for the recipient in the form of counseling and/or medical attention.
- xi. Any other duties as may be prescribed under The Sexual Harassment of Women at Workplace Act, 2013.

L. Review:

This policy shall be reviewed from time to time based on the business, operational or regulatory requirements of the company but not later than the 3 years from the date of the Board's approval. In case of any inconsistency between the policy and the applicable regulatory provision, the regulatory provision shall prevail.
