



Xanadu Policy on Prevention, Prohibition & Redressal of Sexual Harassment at Workplace

Controlled Document: Human Resource Policy

Document Name	Xanadu Policy on Prevention, Prohibition & Redressal of Sexual Harassment at Workplace
With effect from	01-07-2026
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Approved by	Co-Founder & CEO

Amendment Sheet & History of Amendments			
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1. Policy Statement & Purpose

Taking a leap forward in its fight against sexual harassment, the Indian Parliament passed “The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013” (“the Act”). The object of the Act is to provide protection against sexual harassment in the organized as well as the unorganized workplace and provide a proper mechanism of redressal of complaints of sexual harassment.

Xanadu Realty Limited (or “the Company”) is committed to provide a work environment that is professional and mature, free from animosity and one that reinforces our value of integrity that includes respect for the individual. Every employee has the Right to be free from Sexual Harassment and the Right to Work in an environment free from any form of Sexual Harassment in accordance with the Act. **Xanadu** is an equal employment opportunity company and is committed to creating a healthy working environment that enables employees to work without fear of prejudice, gender bias and sexual harassment, and to providing a workplace that is free from discrimination for to all employees without regard to race, caste, religion, color, ancestry, marital status, gender, age, nationality, ethnic origin or disability. **Xanadu** believes that all its employees have the right to be treated with dignity.

Xanadu will not tolerate any form of sexual harassment and take all necessary steps to ensure that its employees are not subjected to any form of sexual harassment. **Xanadu** will actively promote a social, physical and psychological environment that will raise awareness about and deter acts of sexual harassment against its employees.

Where the POSH Act applies, complaints shall be dealt with in accordance with the provisions of the POSH Act and the rules framed thereunder. In addition, as a matter of Company policy, **Xanadu** voluntarily extends a substantially similar internal grievance and redressal mechanism under this Policy to complaints of Sexual Harassment made by or against Employees irrespective of gender, to the extent permitted by applicable law. Such complaints shall be inquired into by the Internal Committee constituted under this Policy. Nothing contained in this Policy shall be construed as extending or modifying any statutory rights, remedies or obligations under the POSH Act.

Objective:

Sexual harassment is not only a serious misconduct but also a criminal offence that can destroy human dignity and freedom. In an order to promote the wellbeing of all the employees, **Xanadu** has framed a policy on prevention, prohibition and redressal of sexual harassment at workplace (the “Policy”) with the following objectives:

- To uphold the commitment of Company to provide an environment free of discrimination and indecent behavior at workplace.
- To promote a workplace culture that encourages mutual respect, accountability, and zero tolerance for sexual harassment.
- To actively promote a social, physical and psychological environment that will raise awareness about and deter acts of sexual harassment.
- To ensure the implementation of the Policy in letter and spirit by undertaking all necessary and reasonable steps including the constitution of appropriate Committees for purposes of gender sensitization and to conduct enquiries into complaints of sexual harassment.
- To carry out appropriate disciplinary and corrective measures against individuals found to have violated this Policy.
- To evolve a mechanism and forum for the prevention and redressal of sexual harassment.

Scope & Applicability:

Xanadu adopts a zero-tolerance approach towards Sexual Harassment. This Policy applies to all categories of employees of the Company, including any person – working in Head Office, Corporate Office, as employee, consultant, contractor, vendor, visitor or other person associated on a regular, temporary, ad hoc, or daily wage basis, either directly or through an agent 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 expressed or implied and includes a co-worker, a contract worker, probationer, trainee, apprentice or called by any other such name, at the workplace or vendor. The Company will not tolerate sexual harassment, if engaged in by customer/s or any other business associate/s.

Compliance with this Policy shall also be a condition of the engagement or association of consultants, contractors and other people to whom this Policy applies, to the extent applicable Local country laws will take precedence over this Policy, in other geographies, if applicable. Where a complaint falls within the scope of the POSH Act, it shall be dealt with by the Internal Committee in accordance with the POSH Act, the rules framed thereunder and this Policy. Where a complaint is covered by this Policy but falls outside the scope of the POSH Act, the Internal Committee shall be authorized under this Policy to receive the complaint, conduct an inquiry and make recommendations to **Xanadu** in accordance with this Policy, the principles of natural justice and applicable law.

Definitions

For purpose of this Policy, unless otherwise stated, the following definitions and abbreviations shall be applicable.

- **Aggrieved Person:** means an individual, of any age and or gender who is allegedly subjected, directly or indirectly, to any act of Sexual Harassment as defined under the Policy.
- **Complainant:** means the Aggrieved Person who files a complaint of Sexual Harassment before the Internal Committee, or any other person who files such complaint on behalf of the Aggrieved Person in the circumstances permitted under this Policy or applicable law.
- **Employee:** means any person engaged by, working for, or working on behalf of **Xanadu** at Xanadu offices or deployed by Xanadu at any other sites / locations for any work on a regular, temporary, ad hoc, fixed-term, project-based, contractual, or daily-wage basis, whether engaged directly or through an agent (including a contractor), with or without the knowledge of the principal employer, whether for remuneration or otherwise, including persons working on a voluntary basis, and whether the terms of engagement are express or implied. The term includes, without limitation, co-workers, contract workers, probationers, trainees, apprentices, interns, consultants, advisors, retainers, secondees, project-based personnel and site staff, irrespective of their designation or the nature of their engagement.
- **Employer:** means any person responsible for the management, supervision and control of the workplace and management includes the person or board or committee responsible for formulation and administration of policies for the Company.
- **Internal Committee:** means the committee constituted by **Xanadu** under the POSH Act and authorized under this Policy to receive complaints, conduct inquiries and make recommendations in relation to complaints of Sexual Harassment covered by this Policy.
- **Presiding Officer:** For the purpose of this Policy, she heads the team of respective ICC and is responsible for ensuring that investigation of a complaint is conducted in an unbiased/ fair manner & confidentiality of the investigation proceedings is maintained.
- **Respondent:** means an individual or individuals against whom a complaint of Sexual Harassment has been made under this Policy.

“Sexual Harassment” – For the purpose of this Policy, term “Sexual Harassment” shall include but not be restricted to the following:

Sexual Harassment is such unwelcome sexually motivated behavior (whether directly or by implication) as:

- Physical contact and advances; or
- Offensive or unwelcome flirtations; or
- A demand or request for sexual favours; or
- Making sexually coloured remarks including sexual tones including repeated sexual innuendoes, sexual epithets, derogatory slurs, sexually explicit jokes; or
- Repeated and persistent requests for dates or having a romantic / sexual relationship, threats or suggestive or insulting sounds; or
- Showing pornography, writing sexually loaded letters, phone calls, text, emails, SMSs, WhatsApp or through any other electronic communication, asking inappropriate questions about a person’s sexual and love life, or demanding or requesting explicit details about one’s marital relationship etc.; or
- And/or any other unwelcome physical, verbal or non-verbal conduct of sexual nature;
 - Showing pornography such as derogatory or sexually explicit posters, cartoons, photographs, magazines, drawings, or other printed items; suggestive objects, pictures; emails, screen savers; or other electronic communications; posters in the background with any sexual context while being on video calls, graphic commentaries and leering or obscene gestures.
 - Any other unwelcome visual, verbal, non-verbal or physical conduct of a sexual nature like staring, stalking, repeatedly sharing content or greetings when there is no response, incessant messaging, calling someone without any prior consent to create an unwelcome personal rapport.

Note: Sexual Harassment may occur through physical conduct, spoken or written communication, gestures, electronic communication, social media, virtual meetings or any other medium.

Further the following circumstances among other circumstances, if it occurs or is present in relation to or connected with any act of behavior of Sexual Harassment, amounts to sexual harassment:

- Implied or explicit promise of preferential treatment of his/her employment, or
- Implied or explicit threat of detrimental treatment of his/her employment, or
- Implied or explicit threat about his/her present and future employment status, or
- Interfering with his/her work and creating an intimidating or offensive or hostile work environment for him/her, or
- Humiliating treatment is likely to affect his/her health and safety.

Visitor or Third Party: means any person who is not an Employee and who visits the Workplace, provides services to, receives services from, or otherwise interacts with the Company or its Employees in connection with the Company's business, operations or activities.

Workplace includes:

- All offices or other premises where the Company’s business is conducted.
- All Company-related activities are performed at any other site away from the Company’s premises.
- Any social, business or other functions where the conduct or comments may have an adverse impact on the workplace or workplace relations.
- Any place visited by the employee arising out of or during employment includes transportation provided by the Employer for undertaking such a journey.

Each employee must exercise his or her own good judgment to avoid engaging in conduct that may be perceived by others as Sexual Harassment. In all the above cases, it is not the intention but the impact of any such action.

POSH Governance

1.1 Prevention of Sexual Harassment at Workplace Committee

An Internal Committee to receive and inquire into complaints of Sexual Harassment shall be constituted by **Xanadu** in accordance with the POSH Act. The Internal Committee shall also exercise the authority conferred upon it under this Policy in respect of complaints that fall outside the statutory scope of the POSH Act but are covered under this Policy.

1.2 Composition of the Internal Committee

- The Internal Committee shall comprise of at least 04 (Four) members including a senior Employee.
- Presiding Officer: The Committee shall be presided over by a senior woman Employee of **Xanadu**.
- Members: A minimum of 02 (Two) members shall be appointed from amongst Employees who are preferably committed to the cause of women or who have experience in social work or legal knowledge relating to Sexual Harassment.
- External Member: At least 01 (one) member shall be appointed from a non-governmental organization or association committed to the cause of women or shall be a person familiar with the issues relating to Sexual Harassment.
- At least one-half of the total members of the Internal Committee shall be women.
- Presiding Officer and Members of internal committee shall automatically vacate office upon ceasing to be an Employee of **Xanadu**. Each member of the Internal Committee shall hold office for such period, not exceeding three years from the date of nomination, as may be specified by **Xanadu**.
- The Internal Committee shall handle complaints in a confidential manner and within a time-bound framework.
- Members of the Internal Committee shall be notified from time to time.
- The Internal Committee will meet once every quarter to discuss Complaints and issues received by it and the course of actions and status on each. The Internal Committee should also meet even if there are no formal Complaints made and to discuss the overall scenario of safety at Workplace and precautions needs to be taken to further strengthening of system.

1.3 Removal or replacement of Internal Committee

In the event Presiding Officer and / or any member of the Internal Committee shall be removed/replaced if the member:

- contravenes any provisions of the Policy or POSH Act; or
- breaches the obligations relating to confidentiality under the POSH Act or this Policy;
- has been convicted of an offence or an inquiry into an offence under any law for the time being in force pending against him/her; or
- is found guilty in any disciplinary proceedings or a disciplinary proceeding is pending against him/her; or
- has abused his/her position to render his/her continuance in office prejudicial to the public interest;

- Any vacancy arising due to cessation of employment, resignation, death, disability, removal or otherwise shall be filled by a fresh nomination in accordance with the POSH Act and this Policy.

1.4 Powers and Duties of Internal Committee

- The Internal Committee shall ensure that the mechanism for submitting complaints is safe, accessible and administered with due sensitivity.
- The Internal Committee shall receive complaints of Sexual Harassment, conduct inquiries diligently and in a timely manner, and make appropriate findings and recommendations to **Xanadu** in accordance with the POSH Act and/or this Policy, as applicable.
- The Internal Committee shall assist the Complainant in making a written complaint, where the Complainant is unable to do so.
- The Internal Committee shall follow the principles of natural justice and treat the Complainant, Respondent, witnesses, and all other people connected to the inquiry with dignity and respect and give both the Complainant and the Respondent a fair opportunity to make their submissions. All members of the Committee shall act without prejudice or bias while conducting inquiries or dealing with complaints of Sexual Harassment.
- The Internal Committee shall make reasonable efforts to ensure that the Complainant and witnesses are not victimized, retaliated against or discriminated against while the complaint is pending.
- A member of the Internal Committee shall recuse themselves from an inquiry if there is conflict of interest or a bias that may affect a fair Inquiry.
- The Internal Committee shall document all material inquiry proceedings and prepare a reasoned inquiry report.
- The members of the Internal Committee shall maintain strict confidentiality and refrain from disclosing any information relating to a potential, pending, or completed complaint of Sexual Harassment directly or indirectly with any person not authorized to receive such information or to any form of media, including print, television or online media except as permitted or required under applicable law or this Policy
- Where the complaint does not fall within the scope of Sexual Harassment under this Policy, the Internal Committee may, with due regard to confidentiality, forward the matter to the appropriate person or internal function for consideration.
- The Internal Committee shall maintain such records and provide such information or reports as may be required under applicable law.

1.5 Responsibilities of Employees

- Everyone has a personal responsibility to ensure that their behaviour complies with this Policy.
- Set an example of dignified workplace behaviour and ethical standards in line with **Xanadu's** values and Code of Conduct.
- Where appropriate, report incidents of Sexual Harassment or suspected violations of this Policy in accordance with the reporting mechanism provided under this Policy.
- Support and cooperate during any inquiry, including appearing as witnesses where required and giving full and truthful disclosure of all relevant information requested by the Internal Committee, while ensuring that complete confidentiality is maintained in relation to any complaint under this policy.
- Handle information related to known or suspected violations of this Policy in a discreet and confidential manner and refrain from independently investigating the information or suspected violations of this Policy on your own i.e., without involving the Internal Committee.
- Report any suspected Sexual Harassment or suspected violation of this Policy to the Internal Committee immediately.

- Do not misuse this Policy by filing malicious complaints about settling personal scores, seeking revenge or obtaining any personal benefit.
- Virtual and Electronic Interactions: Employees shall maintain the same standards of professional conduct during virtual interactions and electronic communications as are expected at the Workplace. Without limiting the generality of this Policy, Employees shall:
- Seek consent, where appropriate, before initiating one-on-one video calls and respect reasonable requests regarding the mode of communication, except where video participation is reasonably required for legitimate business purposes.
- Maintain professional boundaries and refrain from making unwelcome comments, gestures, advances or communications of a sexual nature during virtual meetings or through any electronic or digital medium.
- Do not record, capture, circulate or share any image, audio recording, video recording or communication of another person without their knowledge or consent, except where authorized or required in the ordinary course of business.
- Do not repeatedly contact, message or pursue personal interactions with another person after it has been made clear, expressly or by conduct, that such interaction is unwelcome.
- Do not engage in bullying, stalking, harassment or any unwelcome conduct of a sexual nature through electronic communication, social media, virtual collaboration platforms or any other digital medium where such conduct arises out of or relates to employment or engagement with **Xanadu**.

1.6 Xanadu's Responsibilities

- **Xanadu** will not tolerate any act of Sexual Harassment. It shall treat Sexual Harassment as misconduct and take prompt, appropriate action in accordance with this Policy and applicable law. Provide a safe working environment at the workplace which shall include safety from the people coming into contact at the workplace.
- Display at any conspicuous place in the workplace, the penal consequences of sexual harassment, and the order constituting the Internal Committee.
- Organize gender-sensitization workshops and awareness programs at regular intervals.
- It shall raise awareness about the prevention of Sexual Harassment through such initiatives as it may consider appropriate.
- It will ensure that necessary facilities and information are provided to the Internal Committee for dealing with the complaint and conducting an inquiry.
- Assist in securing the attendance of the Respondent and witnesses before the Internal Committee and make available such information to the Committee as it may require in relation to the complaint.
- It will provide assistance to the Internal Committee in any manner reasonably required to conduct a fair and expeditious inquiry and implement recommendations made by the Internal Committee.
- Treat sexual harassment as a misconduct under the service rules and initiate action for such misconduct.
- Where the alleged conduct constitutes an offence under the Bharatiya Nyaya Sanhita, 2023 or any other applicable law, **Xanadu** shall provide reasonable assistance to the Complainant in initiating appropriate legal proceedings, where requested by the Complainant and in accordance with applicable law.
- Do all other things it may deem fit for successful implementation of this Policy.
- ICC shall submit an annual report on Sexual Harassment to the Employer who will submit the to the concerned authorities. Employers reserve the right to revise, amend or modify this Policy at any time and in any manner without notice. Any change or revision will be available with Corporate HR team and communicated appropriately.

2. Redressal Procedure

2.1 Redressal Mechanism

An Aggrieved Person/ Complainant may make a written complaint of Sexual Harassment to the Internal Committee in accordance with this Policy. If the Aggrieved Person is unable to make a complaint on account of their physical incapacity, a complaint may be filed, with the written consent of the Aggrieved Person, by:

- their relatives or friends; or
- their co-worker; or
- an officer of the National Commission for Women or the State Women's Commission (where the Aggrieved Person is a woman); or
- any person who has knowledge of the incident.

If the Aggrieved Person is unable to make a complaint on account of mental incapacity, a complaint may be filed by:

- their relatives or friends; or
- a special educator; or
- a qualified psychiatrist or psychologist; or
- the guardian or authority under whose care they are receiving treatment or care; or
- any person who has knowledge of the incident jointly with the Aggrieved Person's relative or friend or a special educator or qualified psychiatrist or psychologist, or guardian or authority under whose care they are receiving treatment or care.

If the Aggrieved Person 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 their written consent. If the Aggrieved Person is deceased, a complaint may be filed by any person who has knowledge of the incident, with the written consent of their legal heir.

Where the Respondent is a Visitor or Third Party, the Aggrieved Person may submit the complaint to the Internal Committee. **Xanadu** and the Internal Committee shall take such steps as are reasonably available within their authority, including coordinating with the Respondent's employer or organization, where applicable, and assisting the Aggrieved Person in approaching the appropriate authority. Where a Visitor or Third Party alleges Sexual Harassment by an employee of **Xanadu** in connection with the Workplace, such person may submit a complaint to the Internal Committee, which shall deal with the complaint in accordance with this Policy.

2.2 Complaint Filing Procedure

The following must be adhered to:

- The complaint must be in writing. In circumstances where the Aggrieved Person is unable to make a written complaint, the Internal Committee shall provide reasonable assistance to reduce the complaint into writing and the complaint shall, wherever practicable, be authenticated by the Complainant.
- The Complainant should provide (to the extent reasonably practicable, sufficient particulars including incidents, dates and persons that are involved in their complaint. Details with respect to the following may be provided while filing a complaint:
 - the alleged event, matter or issue that is subject to the complaint (time/date/place etc.)

- the name and details of the Employee (Respondent) against whom the complaint is being filed
 - names and addresses of the witnesses (if any)
 - details of documentary evidence (if any) such as WhatsApp chat records, SMS, E-mails, CCTV Footage, Audio/Video recording etc. and
 - any additional information, documentation, or other evidence available to support the complaint (if any).
- Complaint must be made within a period of 03 (Three) months from the date of incident and in case of a series of incidents, within a period of 03 (Three) months from the date of last incident.
 - The Internal Committee may extend the time limit for receiving a complaint to another period of 03 (Three) months if it is satisfied that the circumstances were such which prevented the Complainant from filing a complaint within the first 03 (Three) months.
 - The Internal Committee shall record the reasons for such extension of 03 (Three) months in writing.
 - The Complaint may be submitted electronically at speakup@xanadu.in to the IC or with any of the IC members.

FOR WOMEN EMPLOYEES

- She-Box - In addition to the above, a woman may submit a complaint of workplace Sexual Harassment through the She-Box platform. She-Box provides single-window online platform for filing and tracking complaints, which are automatically forwarded to the relevant Internal Committee or Local Committee, as applicable. It is available exclusively to women. The availability of She-Box does not limit the right of a woman to submit a complaint directly to the Internal Committee under this Policy. To register your Complaints please visit: She-Box: <https://shebox.nic.in>.

2.3 Complaint Handling Procedure

2.3.1 Procedure for Conciliation

Prior to initiating an inquiry, the Internal Committee may, at the written request of the Complainant, take steps to settle the matter between the Complainant and the Respondent through conciliation. The following shall be adhered to with respect to conciliation:

- Monetary settlement cannot be made the basis of such conciliation.
- In case a settlement has been arrived at, the Internal Committee shall record it and forward it to the Management to initiate action as specified in the terms of settlement recorded by the Internal Committee.
- The Internal Committee shall also provide copies of the settlement as recorded to the Complainant and the Respondent.
- If conciliation has been reached, the Internal Committee shall not be required to conduct any further inquiry unless the Respondent fails to comply with the terms of settlement.

2.3.2 Procedure for conducting Inquiry

If the Complainant does not wish to pursue conciliation or terms of a settlement arrived at through conciliation are not complied with by the Respondent, the Internal Committee shall, upon a written request from the Complainant to do so, conduct an inquiry into the complaint. The following shall be adhered to with respect to the inquiry:

- On receipt of the complaint, the Internal Committee shall send a copy of the complaint to the Respondent within a period of 07 (Seven) working days. The Respondent shall be informed that the

complaint and all related material must be kept strictly confidential and must not be disclosed except as permitted under this Policy or applicable law.

- The Respondent shall file a written reply to the complaint along with a list of documents and names and addresses of witnesses (if any), within a period of 10 (Ten) working days from the date of receipt of the complaint.
- If the Complainant or the Respondent desires any witness to be called, they shall communicate in writing to the Internal Committee the name and relevant particulars of such witness.
- If the Complainant or Respondent desires to tender any documents in evidence before the Internal Committee, they shall supply copies of such documents. Each party shall identify the documents relied upon and, where practicable, certify the copies submitted by them.
- The Internal Committee shall share all material relied upon by one party with the other party and provide a reasonable opportunity to respond, subject to applicable confidentiality requirements and any redactions reasonably necessary to protect sensitive personal information. The Internal Committee shall have the powers to require the attendance of Employees, examine persons and call to produce documents or information reasonably necessary for conducting the inquiry. Refusal by any Employee to attend an inquiry meeting when required or to provide any documents or information within their possession or control may constitute misconduct and may result in appropriate action by **Xanadu**.
- The Internal Committee shall have the right to terminate the inquiry proceedings or to make an ex-parte decision on the complaint, if the Complainant or Respondent fails, without sufficient cause, to present themselves, for 03 (Three) consecutive hearings convened by the Presiding Officer. Such termination or ex-parte order may not be passed without giving a notice in writing, 15 (Fifteen) days in advance, to the Complainant or Respondent as the case maybe.
- In conducting the inquiry, at any point in time, the complaint shall be heard by a minimum of 03 (three) members including the Presiding Officer and the External Member, and the Internal Committee shall complete the inquiry within a reasonable period but not beyond 90 (ninety) days.
- The Internal Committee shall notify in writing the time and dates of its meetings to the Complainant, the Respondent and witnesses, as applicable.
- All inquiry proceedings shall be documented in detail and treated as strictly confidential with restricted viewing only on need-to-know basis.
- Inquiry proceedings shall be minute and recorded in writing. They may be audio recorded as well (where possible). The minutes/transcribed record of the proceedings and the statement of witnesses shall be endorsed by the persons concerned and the Internal Committee as a record of the proceedings.
- All Employees and witnesses who are part of the Internal Committee proceedings shall sign a confidentiality declaration.
- The Complainant and 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 Internal Committee.

Complaints involving a Third Party: Inquiry by **Xanadu's** Internal Committee - If the complaint is filed with the **Xanadu's** Internal Committee:

- The Internal Committee is empowered to receive and conduct an inquiry in accordance with this Policy and applicable law.
- The Internal Committee shall, after completing the inquiry, share its findings and recommendations with the Respondent's employer or organization where applicable, for such action as it considers appropriate.

2.3.3 The Internal Committee shall adhere to the following while conducting inquiry:

- The Internal Committee shall make an inquiry into the complaint in accordance with the principles of natural justice such that the Internal Committee shall provide every reasonable and fair opportunity to the Complainant as well as to the Respondent, for putting forward and defending their respective cases.
- The Internal Committee shall be sensitive to the often covert, private, and subtle nature of Sexual Harassment and shall consider that the Complainant may not be able to submit or present direct or corroborative evidence. The absence of direct or corroborative evidence shall not, by itself, be ground for rejecting a complaint.
- The Internal Committee shall take note of the respective socio-economic positions of the parties, their hierarchy in the workplace, and other power differentials while evaluating the evidence and making its findings and recommendations.
- While inquiring into a complaint, the Internal Committee shall take note that in cases of harassment via postings and messages through electronic and social media, the Internal Committee shall consider the public humiliation that this involves for the Complainant as well as the unwitting exposure of others who are using this media to circulate such messages and images.

2.3.4 Initiation of action during pendency of inquiry

During the pendency of an inquiry, on a written request made by the Complainant, the Internal Committee may recommend any of the following to **Xanadu**:

- In case the Complainant and/or Respondent are Employees, any one or more of the following may be recommended –
 - grant leave to the Complainant up to a period of 03 (Three) months (the leave granted shall be in addition to the leave the Complainant is otherwise entitled to); or
 - transfer the Complainant or Respondent to any other workplace; or
 - restrain the Respondent from reporting on the work performance of the Complainant or writing their confidential report and assigning the same to another Employee (if applicable); or
 - in case the complaint has been filed by an intern or an apprentice working under the Respondent, restrain the Respondent from supervising any official/academic activity of the Complainant and assign the same to another Employee.
 - direct the Respondent to not communicate with the Complainant in any manner including any mode of electronic communication such as text messages, emails, video/audio calls, on any social media platform or via any other mode of electronic communication.
- In case the Respondent is a Visitor/Third Party, any one or more of the following may be recommended –
 - take adequate steps to ensure that they do not enter the Workplace or contact/threaten the Complainant and/or witnesses.

2.3.5 Inquiry Report – Findings and Recommendations

On completion of the inquiry, the Internal Committee shall provide a written report of its findings and recommendations to **Xanadu** within 10 (Ten) days of the date of completion of the inquiry. Such report should also be made available to the Complainant and the Respondent. The inquiry report shall specify the allegations against the Respondent, the statements made and evidence presented by the

Complainant, Respondent and/or witnesses, the Internal Committee's findings, the reasons for such findings, and its recommendations.

a. In case the allegations against Respondent have not been proven –

If the Internal Committee arrives at the conclusion that the allegations against the Respondent have not been proven, it shall recommend to **Xanadu** that no action be initiated against the Respondent and the matter be closed.

b. In case the allegations against the Respondent have been proven –

- Where the Internal Committee determines that Sexual Harassment has taken place, it shall recommend appropriate corrective, disciplinary and preventive measures. In determining its recommendations, the Internal Committee shall consider the nature and severity of the misconduct, the surrounding circumstances, any aggravating or mitigating factors, the impact on the Complainant and whether the Respondent has previously engaged in similar misconduct. Where the Respondent is an Employee, the Internal Committee may recommend any one or more of the following:
 - A written apology from the Respondent;
 - A written warning is to be placed in the Respondent's personnel file;
 - Reprimand or censure the Respondent;
 - Withholding of promotion or reduction in rank;
 - Withholding pay rise or increments;
 - Transfer or suspension without pay;
 - Termination from service/dismissal from the services of **Xanadu**;
 - A direction to undergo a counselling session;
 - A direction to carry out community service;
 - Deduction from the salary or wages of the Respondent such sum as the Internal Committee may be considered appropriate to be paid to the Complainant or to their legal heirs. In case, **Xanadu** is unable to make deductions from salary of the Respondent due to them being absent from duty or cessation of employment, it may direct the Respondent to pay such sum to the Complainant. In case the Respondent fails to pay the sum, the Internal Committee may forward the order for recovery of the sum as an arrear of land revenue to the District Officer concerned.
- The Internal Committee shall consider the following factors, as applicable, when considering the amount to be paid to the Complainant into consideration:
 - the mental trauma, pain, suffering, and emotional distress caused to the Complainant;
 - the loss of career opportunity due to the incident of Sexual Harassment;
 - medical expenses incurred by the Complainant for physical or psychiatric treatment;
 - the income and financial status of the Respondent;
 - the feasibility of such payment in lump sum or in instalments.
- c.** Where the Respondent is a Third Party, the Internal Committee may recommend any one or more of the following:
 - Communication of the inquiry findings and recommendations to the Respondent's employer, organization or competent authority, where applicable, for appropriate action.
 - Issuance of a warning to the Respondent and/or the Respondent's employer or organization, where applicable;
 - Declaring the Workplace/organization out of bounds to the Respondent;

- Withdrawal of the right to provide services to organization for a certain period (if applicable);
- Providing reasonable assistance to the Complainant in approaching the police or any other competent authority where requested;
- Debarring/blacklisting the Respondent from future engagement or association with **Xanadu**;
- Any other corrective or preventive measure reasonably available to **Xanadu** under applicable law or the terms governing its relationship with the Third Party.

Xanadu shall act upon the recommendations made by the Internal Committee within 60 (sixty) days of receipt of the inquiry report.

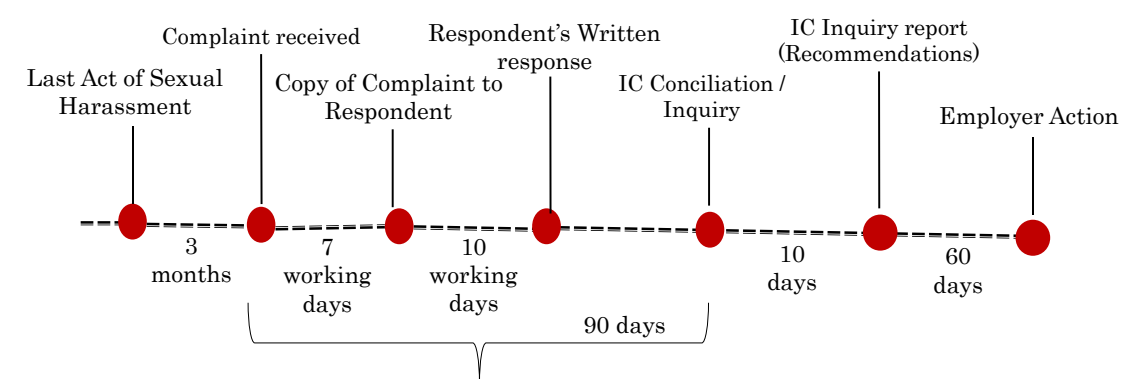
2.3.6 Malicious Complaints

- If on inquiry, it is revealed that the complaint was made with malicious intent or with knowledge that the allegations were false, strict action will be recommended by the Internal Committee against the Complainant. Hence, in case the Internal Committee arrives at a conclusion that allegation against the Respondent is malicious or Complainant has made the complaint knowing it to be false or has produced forged or misleading evidence, the Internal Committee may recommend appropriate action against the Complainant in accordance with applicable law and **Xanadu's** policies.
- A mere inability to substantiate a complaint or provide adequate proof need not attract action against the Complainant as malicious intent shall be established through the inquiry before any action is recommended against the Complainant. Mere inconsistencies, inability to recollect details, or the absence of corroborative evidence shall not, by themselves, amount to malicious intent.

2.3.7 Appeal Procedure

Complaints governed by the POSH Act - Where the complaint is governed by the POSH Act, any party aggrieved (Complainant or Respondent) by the recommendations of the IC and / or non-implementation of recommendations may file an appeal to the Appellate Authority as per service rules and/or as per other provisions of the POSH Act and applicable law within 90 (ninety) days from the date of the recommendations.

Timelines



2.3.8 Support Services

Xanadu shall endeavour to facilitate access to a mental health professional or other appropriate support services, for any of concerned party, on request where reasonably considered necessary and feasible.

3. Other Policy Considerations

3.1 Confidentiality

All information and proceedings pertaining to Sexual Harassment must be kept confidential. Therefore, the contents of the complaint, the identity and addresses of the Complainant, Respondent and witnesses, any information relating to conciliation and inquiry proceedings, the inquiry report including the recommendations of the Internal Committee and the action taken pursuant to the recommendations against the Respondent shall not be published, communicated or made known to the public, press or media in any manner except as permitted or required under applicable law. However, information may be disseminated regarding the justice secured to any Aggrieved Person without disclosing the name, address, identity or any other particulars calculated to lead to the identification of the Complainant or witnesses. Appropriate information shall be shared with Government authorities as per Law.

If any person (including Complainant, witnesses) breaches confidentiality, **Xanadu** shall be entitled to take appropriate action in accordance with applicable law and its policies.

3.2 Protection against Retaliation

No person shall be subjected to retaliation, who, in good faith, files a complaint or participates in any way in an inquiry under this Policy. **Xanadu** shall take reasonable steps to prevent and address retaliation. Individuals engaging in retaliatory conduct will be subject to disciplinary action and where appropriate, legal action and/or Police complaint. If an Employee suspects that someone they know has been retaliated against for raising a complaint, they are encouraged to immediately contact the Internal Committee.

3.3 Filing of Complaint with Police

Nothing in this Policy shall preclude any person from simultaneously lodging a complaint with the police in respect of any act amounting to an offence under applicable law. If requested by the Complainant, **Xanadu** shall provide reasonable assistance in this regard, to an extent reasonably practicable and in accordance with applicable law.

3.4 Awareness and Sensitization

- The Internal Committee and the Human Resources Department shall be responsible to create and maintain a safe environment that is free of Sexual Harassment by promoting a culture of equality, dignity and respect.
- Workshops and awareness programmes shall be organized at regular intervals for sensitizing Employees with the provisions of this Policy.
- The names, designations, official contact details and email addresses of the members of the Internal Committee shall be published and made easily available to the Employees.

3.5 Review and Audit

- The entire redressal process along with its documentation shall be subject to periodic review.
- It is mandatory to maintain records of the complaints received along with the details of the proceedings at the time of inquiry.
- **Xanadu** shall periodically monitor the timely submission of reports to the relevant Government Authorities, as applicable.
- **Xanadu** reserves the right to amend this Policy in order to comply with any applicable laws/rules/regulations that come into effect from time to time or otherwise require amendments to this Policy.
- This Policy should be reviewed on a biennial basis or earlier, to incorporate amendments.

3.6 Internal Committee Members

Members of the Internal Committee of Xanadu Realty Limited for the period **July 01, 2026 to June 30, 2029** are as follows:

IC of MMR	Sl. No.	Name	Gender	Role
	1	Sharon Dmello	Female	Presiding Officer
	2	Madhur Mital	Male	Member
	3	Akshay Soman	Male	Member
	4	Khushboo Dau	Female	Member
	5	Pallavi Babar	Female	Member
	6	Lakshita Bhati	Female	External Member

IC of Pune Region	Sl. No.	Name	Gender	Role
	1	Sharon Dmello	Female	Presiding Officer
	2	Nitya Chatterjee	Male	Member
	3	Chitra Jalan	Female	Member
	4	Pallavi Babar	Female	Member
	5	Lakshita Bhati	Female	External Member

IC of Bangalore Region	Sl. No.	Name	Gender	Role
	1	Sharon Dmello	Female	Presiding Officer
	2	Navin Chand	Male	Member
	3	Manisha Singh	Female	Member
	4	Pallavi Babar	Female	Member
	5	Lakshita Bhati	Female	External Member

If the Complainant needs assistance in writing the complaint, they can seek help from the Internal Committee. The complaint can be submitted to the Internal Committee electronically (at speakup@xanadu.in) or physically.

Xanadu may reconstitute or modify the composition of the Internal Committee from time to time in accordance with the POSH Act and this Policy. Any such change shall take effect from the date notified by **Xanadu**.

Incidents and Procedure

