



Prevention of Sexual Harassment Policy

Version Control

Version	1.0
Reviewed and Approved by	Board of Directors of Nxt-Infra Entities
Approved date	September 10, 2024, September 11, 2024 and September 12, 2024 respectively

This policy is applicable in respect of the following companies (“Nxt-Infra Entities”):

Walter Infra Manager Private Limited (acting as Investment Manager of Nxt-Infra Trust)
Walter Infra Project Manager Private Limited (acting as Project Manager of Nxt-Infra Trust)
Nxt - Infra MCP Highways Private Limited (an SPV of Nxt-Infra Trust)
DM Expressway Private Limited (an SPV of Nxt-Infra Trust)
Nxt-Infra CT Highways Private Limited (an SPV of Nxt-Infra Trust)
Welspun Road Infra Private Limited (an SPV of Nxt-Infra Trust)
Nxt-Infra CGRG Highway Private Limited (an SPV of Nxt-Infra Trust)
Nxt-Infra GSY Highway Private Limited (an SPV of Nxt-Infra Trust)

1. Objective

Nxt-Infra has a zero-tolerance policy for any act of sexual harassment of any kind and any act of suppressing or distortion of such facts or evidence and retaliation. Nxt-Infra is committed to take all necessary steps in ensuring that its staff works in a safe and respectful environment that is conducive to their professional growth and promotes equality of opportunity.

The objective of this policy is to prohibit, prevent and deter any acts of sexual harassment, and to provide a procedure for dealing with cases of sexual harassment. This policy has been published pursuant to the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and rules made there under

2. Policy Statement

The Prevention of Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 read along with its Rules of 2013, states that no employee shall be subject to Sexual Harassment at any Workplace.

3. Applicability

The policy applies to Nxt-Infra Entities and all employees (full-time, part-time, trainees and those on contractual assignments and visitors) of Nxt-Infra Entities including any gender. The policy covers such acts occurred within the premises of the organisation or deemed premises which are within the organisation’s control.

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4. Definition:

- i. Act - Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, rules made, and circulars/ guidelines issued there under.
- ii. Aggrieved Person- In relation to workplace, a person of any age whether employed or not, who alleges to have been subjected to any act of sexual harassment by the Respondent.
- iii. Employee — Employee shall have the meaning as defined in sub-section f of Section 2 of the Act.
- iv. Nxt-Infra Entities – Nxt-Infra Entities shall include all entities forming part of the Nxt-Infra Trust group, including but not limited to its Investment Manager, Project Manager, its special purpose vehicle(s), and its Holdco(s) and shall be deemed to include entities which may be established as SPV(s) or Holdco(s) of Nxt-Infra Trust from time to time.
- v. Respondent- An Employee against whom the complaint has been filed.
- vi. Workplace- Workplace includes:
 - All offices or other premises where Nxt-Infra Entities' business is conducted.
 - All Nxt-Infra related activities performed at any other site away from the Nxt-Infra Entities' 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(s) arising out of or during the course of employment including transportation by Nxt-Infra Entities for undertaking such journey
- vii. Sexual harassment includes any one or more of the following unwelcome acts or behavior (whether directly or by implication) namely:
 - (a) physical contact and advances,
 - (b) a demand or request for sexual favours,
 - (c) making sexually coloured remarks,
 - (d) showing pornography, or
 - (e) any other unwelcome physical, verbal or non-verbal conduct of sexual nature.

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

- (a) implied or explicit promise of preferential treatment in employment, (b) implied or explicit threat of detrimental treatment in employment,
- (b) implied or explicit threat about present or future employment status,
- (c) interference with work or creating an intimidating, offensive, or hostile work environment or
- (d) humiliating treatment likely to affect an individual's health or safety.



Sexual harassment includes 'quid pro quo' harassment when an individual's submission to unwelcome sexual conduct becomes an explicit or implicit condition of employment or when decisions such as promotion, transfer, compensation or discipline are determined on the basis of an individual's response to such conduct.

5. Compliance with Laws and Regulations

A. INTERNAL COMPLAINTS COMMITTEE (ICC)

The ICC shall constitute the following members:

- (a) a Presiding Officer who shall be a woman employed at a senior level at workplace from amongst the employees:

Provided that in case a senior level woman employee is not available, the Presiding Officer shall be nominated from other offices or administrative units of the workplace.

Provided further that in case the other offices or administrative units of the workplace do not have a senior level woman employee, the Presiding Officer shall be nominated from any other workplace or other department or organisation;

- (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:

The Presiding Officer and every member of the ICC shall hold office for such period, not exceeding three years, from the date of their nomination as may be specified by the employer.

The Member appointed from amongst the non-governmental organizations or associations shall be paid such fees or allowances for holding the proceedings of the ICC, by the employer, as may be prescribed.

Details of the members, including their names and contact information shall be displayed on the office noticeboard and will also be published on the intranet web pages and will be updated on a periodic basis. The ICC shall function in accordance with the charter notified by the Manager for the functioning of the ICC.

The ICC shall submit to the employer and District Officer an annual report of his organization which shall include -

- (a) Number of complaints of sexual harassment received in the year
- (b) Number of complaints disposed off during the year
- (c) Number of cases pending for more than ninety days
- (d) Number of workshops or awareness programmer against sexual harassment carried out
- (e) Nature of action taken by the employer or District Officer where no such report is

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required to be prepared, intimate such number of cases, if any, to the District Officer.

B. RESPONSIBILITIES & PROCEDURE

- **Complaint Mechanism and Appeal:** Any aggrieved employee himself/herself or alternately, as provided under the Act can:
 - File a complaint with the Internal Complaints Committee (ICC) within a period of three (3) months from the date of the incident or three (3) months from the date of the last incident, in case of a series of incidents, through email, at posh@nxt-infra.com. Note that this email id shall only be accessible by the Presiding Officer.i.e. Ms. Aditi Tawde and Mr. Rakshit Jain.
 - The ICC may extend the time limit to a further period of three months, if it is satisfied that the circumstances were such which prevented the aggrieved person from filing a complaint within the prescribed period.
 - If a person is unable to make a complaint on account of physical or mental incapacity or death, or if the person is ill-literate, the person's legal heir or any other person prescribed can submit a complaint on such person's behalf. Such a complaint can be filed by writing to the email address provided below or to the concerned human resources point of contact. Email:posh@nxt-infra.com.
 - Where such a complaint cannot be made in writing or complainant is unwilling to initiate the complaint in writing, the Presiding Officer or any member of the ICC shall render all reasonable assistance to the aggrieved person and submit the complaint in writing on behalf of aggrieved person
 - Complaints can be filed either electronically or as a physical handwritten complaint to the ICC. All complaints shall be accompanied by the requisite supporting documents which contain details of relevant dates, timings and locations; name of the respondent(s); and the working relationship between the parties. It should also include names and address of witnesses to the extent available and which the complainant believes to be true and accurate. If the complaint is filed in physical form, the complainant shall furnish six (6) copies of the complaint and accompanying documents.
 - Where any offence attracts the provisions of the The Bharatiya Nyaya Sanhita, 2023, then at the request of the complainant, the Manager shall assist the complainant in filing a police complaint.
 - Request the ICC for settlement of the matter through conciliation; provided such request is made before the ICC initiates an inquiry under the Act.
- **Appeal:** Any person aggrieved from the ICC report may prefer an appeal to the Court as prescribed in the Act within a period of ninety days from the date of the ICC report.

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➤ **Responsibilities of the ICC**

The ICC shall:

- Investigate every formal written complaint of Sexual Harassment.
- Provide reasonable opportunity to the aggrieved employee and respondent for presenting and defending their respective case before the ICC.
- Initiate appropriate remedial measures to respond to any substantiated allegations of Sexual Harassment and
- Complete its inquiry within ninety days of acceptance of the complaint.

➤ **The ICC Inquiry Process:**

The ICC will examine every complaint of Sexual Harassment as per the guidelines prescribed under the Act and ensure that a fair and just investigation is undertaken.

➤ **What Action can the ICC take:**

The ICC may, if it deems appropriate recommend the following actions (not exhaustive):

- Written apology;
- Warning, reprimand, censure;
- Termination from service;
- Compensation deduction from the salary or wages of the perpetrator;
- Withholding of promotion, withholding of pay rise or increments;
- Undergoing counseling session or carrying out community service; and/or
- Initiate appropriate statutory or legal action.

➤ **Making False or Malicious Complaints:**

Where the ICC arrives at a conclusion that the complaint was made with a malicious intent, the ICC shall take strict disciplinary action against the complainant, which action may be similar to the action taken for committing an act of Sexual Harassment. The ICC shall also take strict disciplinary action on any witness who submits false evidence or produces any forged or misleading document relating to the complaint.

6. Prohibition of disclosure information

This policy and the law prohibit any person from publishing, communicating or making known to fellow employees, the public, press and media in any manner, contents of the complaint, the identity and addresses of the aggrieved woman, respondent and witnesses, any information relating to conciliation and inquiry proceedings, or recommendations of the ICC. Any violation shall also be subject to disciplinary action and appropriate compensation and monetary penalty in accordance with the provisions of the law and the Manager's policies and procedures.

However, it is to be noted that if the complaint has been registered with the police/under the The Bharatiya Nyaya Sanhita, 2023, the matter may become part of public proceedings. Even in such instances, any person privy to the complaint, inquiry or proceedings should not disclose

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the identity and address of the aggrieved woman, respondent and witnesses to the public, press or the media in any manner

7. Policy Review

This policy will be periodically reviewed and updated to ensure its continued effectiveness and compliance with changing laws and regulations. Helps organisations to strengthen and mitigate the risks associated with bribery and corruption effectively. Regular reviews ensure that the policy remains aligned with the organisation's objectives and responsive to changes in the business environment.

This policy will be automatically amended to the extent of any relevant change(s) in the applicable laws and or for any change(s) in fact.

The policy was amended in the month of July and August 2025 respectively and approved in the Board meetings of the respective entities.

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