



INDIA LEASE DEVELOPMENT LIMITED

CIN : L74899DL1984PLC019218

Regd Office : MGF HOUSE, 4/17-B, ASAF ALI ROAD, NEW DELHI – 110002

Phones: 41519433, 41520070 Fax : 011- 41503479

Website : www.indialease.com E-mail : info@indialease.com

BOARD DIVERSITY POLICY

INTRODUCTION

In terms of Regulation 19 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and under part D, Schedule II to the said Regulation, a Board Diversity Policy is to be framed. The Policy has to be approved by Nomination and Remuneration Committee.

PURPOSE

The Board Diversity Policy ('the Policy') sets out the approach to diversity on the Boards of Directors (Board) of India Lease Development Limited (ILD) and enable the Board to have broad spectrum of demographic attributes.

VISION

The Company recognizes the importance and benefits of having the diverse Board to enhance quality of its performance.

POLICY STATEMENT

ILD recognizes that a truly diverse Board will have the benefit of leverage difference in the skills, knowledge, thoughts, perspective, race, gender and other distinctions between directors. These differences will be considered in determining the optimum composition of the Board. All the appointments on Board will be made on merit, skills, experience and knowledge which the Board as a whole requires to be effective. The strength of the directors on the Board shall be in compliance with the Articles of Association. The Board of Directors of the company shall have optimum combination of Executive and Non-Executive directors with atleast one woman director. The Nomination and Remuneration Committee shall identify persons who are qualified to become directors, recommend to the board their appointment and renewal and shall carry out evaluation of every director's performance. In this regard ILD shall continue to provide sufficient information to shareholders about the qualification, experience and expertise of each Board member.



INDIA LEASE DEVELOPMENT LIMITED

CIN : L74899DL1984PLC019218

Regd Office : MGF HOUSE, 4/17-B, ASAF ALI ROAD, NEW DELHI – 110002

Phones: 41519433, 41520070 Fax : 011- 41503479

Website : www.indialease.com E-mail : info@indialease.com

MONITORING AND REPORTING

The Nomination Committee will report annually, in the Corporate Governance Report, on the Board's composition under diversified perspectives, and monitor the implementation of this Policy.

REVIEW OF THIS POLICY

The Nomination Committee will review this Policy, as appropriate, to ensure the effectiveness of this Policy. The Nomination Committee will discuss any revisions that may be required, and recommend any such revisions to the Board for consideration and approval.

DISCLOSURE OF THIS POLICY

This Policy will be uploaded on the Company's website www.indialease.com for public information.

A summary of this Policy together with the measurable objectives set for implementing this Policy, and the progress made towards achieving those objectives will be disclosed in the annual Corporate Governance Report.

. POLICY ON PREVENTION OF SEXUAL HARASSMENT AT WORKPLACE

1. INTRODUCTION

India Lease Development Limited (ILD) believes that every employee should have the opportunity to work in an environment free from any conduct which can be considered as sexual harassment. Sexual Harassment infringes the fundamental right of a woman to gender equality under Article 14 and 15 of the Constitution of India and her right to life and live life with dignity under Article 21 of the Constitution of India which includes right to a safe environment free from sexual harassment.

The right to protection from sexual harassment and right to work with dignity are recognized as universal human rights by International Conventions such as Convention on the Elimination of all Forms of Discrimination against Women, which has been ratified by Government of India. Also, the Supreme Court of India had laid down the fundamental guidelines to address the issue of sexual harassment. Consequentially the Government of India enacted The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 ("Act") which was published in Gazette of India on 22nd April 2013 and The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Rules, 2013 ("Rules") which was published in Gazette of India on 09th December, 2013.

2. SCOPE

This policy extends to all employees of the company and is deemed to be incorporated in the service conditions of all employees.

Sexual harassment would mean and include any of the following:

- Sexual harassment would mean and include any of the following: Unwelcome sexual advances, requestor demand for sexual favors either explicitly or implicitly in return for any favour or otherwise.
- Unwelcome sexual advances involving verbal, non-verbal or physical conduct such as sexually coloured remarks, jokes, letters, messages, phone calls, e-mails, gestures, showing of pornography, lurid stares, physical contact or molestation, stalking, sounds which offends the individuals dignity.
- Act or conduct by a person in authority which creates the environment at workplace or outside work place hostile or intimidating to the person belonging to the opposite or same sex.
- Any other unwelcome physical, verbal or non-verbal conduct of sexual-nature

3. DEFINITIONS

Sexual Harassment by any employee in the workplace, which may lead to preferential treatment, detrimental treatment, intimidating or offensive work environment or humiliating conduct, has been defined as including "**unwelcome**" sexually determined behaviour (whether directly or by implication) such as:

- physical contact and advances;
- a demand or request for sexual favours;
- making sexually coloured remarks;
- showing pornography;
- Any other unwelcome physical, verbal or non-verbal conduct of a sexual nature;
- Digital harassment, including sending communications using online platforms such as sexually coloured remarks, remarks on personal appearances, gender preference, etc.; and
- Cyber-stalking through virtual communication platforms.

The following circumstances, amongst other circumstances if present in relation to or connected with any act or behaviour of sexual harassment may amount to Sexual Harassment:

- Implied or explicit promise of preferential treatment in employment
- Implied or explicit threat of detrimental treatment in employment
- Implied or explicit threat about present or future employment status
- Interference with work or creating an intimidating or offensive or hostile work environment
- Humiliating treatment likely to affect health or safety

Please note, this is not a comprehensive list and is only indicative of what could be termed as Sexual Harassment. Also refer to Chapter I, Section 3, subsection 2 of **The Sexual Harassment of Women at Workplace (Prevention, Prohibition & Redressal) Act, 2013 (hereinafter referred to as "the Act")**.

Note that the Act has already defined "sexual harassment" by focusing on the impact of an act on an aggrieved person, rather than the intent of the aggressor. Hence, unwelcome acts can happen through any medium, online or in person, and continue to be relevant as employees work from home.

'Aggrieved employee' in relation to the workplace means the person, of any age, who alleges to have been subjected to any act of Sexual Harassment by another employee.

'Complainant' means an Aggrieved employee who submits a written complaint of Sexual Harassment at workplace to the POSH Committee.

'Respondent' means a person against whom the Complainant has made her/his complaint (who may or may not be an employee of ILD).

'Employee' means a person employed at or affiliated with ILD or its affiliates, for any work on 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 co-worker, a contract worker, probationer, trainee, intern, apprentice or called by any other such name.

'Workplace' means ILD, and its affiliates and any place visited by the Employee arising out of or during the course of employment including transportation provided by ILD for official or statutory purposes, and also applies to the virtual/online workplace when Employees are working from home.

4. COMPLAINT REDRESSAL COMMITTEE

The company will form a committee. The committee will consist of female employees and male employees selected by the CEO of the Company. The committee will be headed by a female employee as chairperson. The tenure of the members shall be 24 months unless extended. The committee will have the power to co-opt any employee as deemed fit to facilitate the process of enquiry.

5. REDRESSAL PROCESS

- Any employee who feels is being sexually harassed directly or indirectly may submit a complaint against the alleged incident in writing to chairperson of the committee within 3 months of occurrence of the incident or any other extended period as may be allowed on reasonable ground.
- The Company will maintain a register to record the complaint received and treat the contents as highly confidential
- Committee will hold a meeting with the complainant within 72 hours of receipt of the complaint but not later than one week in any case.
- At the first meeting, all the committee members present along with the chairperson shall hear the complainant and her/his allegations. The complainant can also submit corroborative material with a documentary proof, oral or written material, witness to substantiate his/her complaint. The entire proceeding should be recorded vividly in camera or in person.
- Thereafter, the person against whom complaint is made maybe called for a deposition before the committee. An opportunity will be given to him/her to give an explanation, after which an enquiry shall be conducted and concluded.
- Whether the complaint is substantiated or not, the chairperson of the committee after deliberating shall submit her findings and

recommendations to the CEO of the Company.

- The name of the complainant and the nature of complaint shall be treated as highly confidential to maintain sanctity of the process and the matter will not be discussed with any other employee of the company under any circumstances.
- The committee shall complete the enquiry within 30 days from the date of complaint.
- In case the complaint is found to be false or baseless, the complainant shall be liable for apt disciplinary actions by the management
- Disposal of enquiry report by CEO of the Company.
- Provision of appeal to the Chairman of the Company.

6. THE SEXUAL HARRASSMENT OF WOMEN AT WORKPLACE (PREVENTION, PROHIBITION AND REDRESSAL) ACT, 2013

The provisions of sexual harassment of women at workplace (prevention, prohibition, and redressal) Act, 2013 will prevail, notwithstanding anything contained in the policy as above.

7. CONCLUSION

As a responsible corporate citizen, ILD is committed foster a gender friendly workplace its seeks to enhance equal opportunities to all genders, prevent/stop/redress sexual harassment at the workplace and institute good employment practices.

INDIA LEASE DEVELOPMENT LIMITED

POLICY ON PREVENTION OF SEXUAL HARASSMENT AT WORKPLACE

1. COMMIMENT:

The Company is committed to promoting a work environment that is conducive to the professional growth of its employees and encourages equality of opportunity.

It will not tolerate any form of sexual harassment. It will take all necessary steps to ensure that its employees are not subjected to any form of harassment.

2. SCOPE:

This policy applies to all categories of employees of the company.

3. DEFINITION OF SEXUAL HARASSMENT:

Sexual harassment may be one or a series of incidents involving unsolicited and unwelcome sexual advances, request for sexual favours, or any other verbal or physical conduct of sexual nature.

4. RESPONSIBILITIES REGARDING SEXUAL HARASSMENT:

All employees of the company have a personal responsibility to ensure that their behaviour is not contrary to this policy and maintain cordial work environment.

5. COMPLAINT MECHANISM

An appropriate Redressal Committee has been created in the company for time bound redressal of the complaint made by the victim.

6. REDRESSAL COMMITTEE

Initially and till further notice, the Redressal Committee being constituted will comprise of the following two members only:-

- i) Chief Executive Officer
- ii) Company Secretary

The Redressal Committee is responsible for:

- i) Investigating written complaint.
- ii) Taking appropriate remedial measures to respond to any substantiated allegations of sexual harassment.
- iii) Discouraging and preventing employment related to sexual harassment.

7. PROCEDERS FOR RESOLUTION, SETTLEMENT OR PROSECUTION OF ACTS OF SEXUAL HARASSMENT:

The Company is committed to providing a supportive environment to resolved concerns of sexual harassment as under:-

A. Informal Resolution Options

When an incident of sexual harassment occurs, the victim can request the harasser to behave decently. If the harassment does not stop or if victim is not comfortable with addressing the harasser directly, the victim can bring her concern to the attention of the Redressal Committee for redressal of her grievances. The Redressal Committee will thereafter provide advice or extend support as requested and will undertake prompt investigation to resolve the matter.



INDIA LEASE DEVELOPMENT LIMITED

:2:

B. Complaints:

- i. An employee disclosing about herself with a harassment concern may make a formal complaint in writing in the form of a letter to the Company Secretary within 15 days from the date of occurrence of the alleged incident.
- ii. The Company Secretary will proceed to determine whether it falls under the purview of Sexual Harassment, preferably within 30 days from receipt of the complaint and in case it does not fall within the parameter, he will record his reasoning in writing.
- iii. Where such conduct, on the part of the accused, amounts to a specific offence under the Law, the company shall initiate appropriate action in accordance with law by making a complaint with the appropriate authority.
- iv. The Redressal Committee shall conduct such investigations in a timely manner and shall submit a written report containing the findings and recommendations to the Chairman not later than 90 days from the date of receipt of the complaint. The Chairman will ensure corrective action on the recommendations of the Redressal Committee and keep the complainant informant of the same.

Corrective action may include any of the following:-

- a. Formal apology
- b. Counseling
- c. Written warning to the perpetrator and a copy of it maintained in the employee's file.
- d. Change of work
- e. Suspension or termination of services of the employee found guilty of the offence.
- f. In case the complaint is found to be false, the complainant shall, if deemed fit, be liable to appropriate disciplinary action by the Management.

8. CONFIDENTIALITY

To protect the interest of the victim, the accused person and others who may report incidents of sexual harassment, confidentiality will be maintained throughout the investigatory process.

9. PROTECTION TO COMPLAINANT/VICTIM

The company will ensure that the victim who brings a harassment complaint or witnesses are not victimized or discriminated against while dealing with complaints of sexual harassment.

However, any one who abuses the procedure (for example, by maliciously putting an allegation knowing it to be untrue) will be subject to disciplinary action.

10. CONCLUSION

In conclusion, the company reiterates its commitment to providing its employees, a workplace free from harassment/discrimination and where every employee is treated with dignity and respect.

