

Prevention of Sexual Harassment Policy

POLICY STATEMENT OF PURPOSE & SUMMARY

This policy is to provide an overview about prevention of sexual harassment at workplace and mechanism to address sexual harassment related concerns in the TIAA Global Capabilities Private Limited (hereinafter be referred to as the “Organization” or “TIAA GC” in this policy).

TIAA GC Prevention of Sexual Harassment (POSH) Policy ensures a safe and inclusive work environment, free from sexual harassment, discrimination or inappropriate behavior. The policy establishes a robust redressal mechanism to ensure sexual harassment complaints are addressed fairly, confidentially, and without bias. TIAA GC is committed to the safety and dignity of its associates and has zero-tolerance towards such issues.

All associates of TIAA GC are expected to uphold the highest standards of ethical conduct at the workplace and in all their interactions. This means that all associates have a responsibility to:

- Treat each other with dignity and respect
- Follow the letter and spirit of law
- Refrain from any unwelcome behavior that has sexual connotation (of sexual nature)
- Refrain from creating a hostile atmosphere at workplace via sexual harassment
- Report sexual harassment experienced and/or witnessed to appropriate authorities and abide by the complaint handling procedure of TIAA GC.

TIAA GC will take necessary steps to educate its associates as to what may constitute sexual harassment and in the event of occurrence of any such incident, TIAA GC will provide a mechanism to seek recourse and redressal to the individual allegedly subjected to sexual harassment. Appropriate corrective action will be implemented based upon the results of the investigation in the event harassment is found to have taken place.

APPLICABILITY

The sexual harassment provisions and prohibitions in this policy apply to all genders including women, men, transgender, bi-gender and others.

This policy applies to all full-time or part-time associates (including any supervisor, manager, intern, or coworker) or third-party associates (such as contingent worker, volunteer, applicant, visitor or independent contractor) covering all workplace and work-related interactions, whether in:

- Office premises
- Remote settings
- Virtual engagements
- Work-related travel

POLICY KEY TAKEAWAYS

- Zero Tolerance for sexual harassment
- Applicable to all individuals associated with TIAA GC
- Comprehensive redressal mechanism
- Protection against retaliation within the purview of the IC investigation
- Disciplinary actions
- Regular awareness & training

DEFINITIONS & TERMS WITH SPECIAL MEANINGS

1. “Sexual Harassment” may include any of the following but not limited to:
 - Unwelcome sexual advances involving verbal, non-verbal, or physical or verbal conduct, implicit or explicit
 - Demand or request for sexual favors
 - Sexually colored remarks or gesture, in written or digital form
 - Showing and exhibition of pornography
 - Any other unwelcome physical, verbal, or non-verbal conduct of sexual nature

The following circumstances, among others, if they occur or are present in relation to or connected with any act or behavior of Sexual Harassment, may amount to Sexual Harassment:

- Implied or explicit promise of preferential treatment in the employment.
- Implied or explicit threat or detrimental treatment in the employment.
- Implied or explicit threat about the present or future employment status.
- Interference with the 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. Hence, unwelcome acts can happen through any

medium, online or in person, at home or in the office premises or in a place visited in the course of employment and continues to be relevant as associates work from home or in hybrid work environment.

As used here, the term “sexual harassment” shall apply to circumstances involving sexual harassment defined under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (“Act”).

The POSH policy prioritizes the impact of behavior on complainant and not the intent. Intent does not justify or negate actions that are perceived as unwelcome or offensive.

2. “Internal Committee (IC)”: Organization designated body handling sexual harassment complaints.
3. “Complainant”: The person filing a complaint alleging to have been subjected to any act of Sexual Harassment by the Respondent under this policy.
4. “Respondent”: The person against whom a Sexual Harassment complaint is filed under this policy.

GENERAL RESTRICTIONS & REQUIREMENTS

Internal Committee (IC)

TIAA GC has constituted an Internal Committee for its offices in Mumbai and Pune. The IC is responsible for addressing and resolving complaints within the scope of the policy in a fair, confidential, and unbiased manner.

Role of the IC

- Receive, document, and investigate complaints while ensuring confidentiality and fairness.
- Follow due process, interview involved parties, gather evidence, and recommend appropriate actions based on findings.
- Organize workshops, training programs and sensitization sessions to educate associates about POSH policies and workplace safety.

Role of the Complainant

Provide relevant information as is required in the formal complaint, including documentary evidence or details of any witness relevant to the inquiry, to enable the complaint to be handled in a timely manner and to treat all matter with confidentiality.

Procedure to File a Complaint

Associates are encouraged to report incidents without fear of retaliation, as the policy enforces confidentiality and strict non-retaliation.

Associates facing sexual harassment or witnessing an incident can file a complaint through the following process:

If anyone experiences or witnesses Sexual Harassment in the workplace, he/she/they can complain in writing to:

- a) Any member of the local IC as mentioned in Annexure – I.
- b) Send an email to the confidential email ID as mentioned in the “Contact” section of this Policy
- c) A Complainant can make a complaint to the IC in writing within a period of three (3) months from the date of an incident and in case of a series of incidents, within a period of three (3) months from the date of the last incident. Complaints can be sent via email, with a secure password to any of the above listed.
The IC at respective offices may, for the reasons to be recorded in writing, extend the time limit not exceeding three months, if it is satisfied that the circumstances were such, which prevented the Complainant from filing a complaint within the said period.
- d) In case the Complainant cannot lodge the complaint in writing, the presiding officer or any member of the IC will render all reasonable assistance to the Complainant for making the complaint in writing. In case the Complainant is unable to make the complaint on her/his/their own for any reason, the complaint can be made on her/his/their behalf by her/his/their legal heir, or any such person as may be prescribed in case of mental or physical incapacity or death of the Complainant.
- e) For a thorough and fair investigation, it is advised that IC is provided with relevant facts and supporting information.
- f) For cases where the Complainant is a visitor or an associate of a vendor, sub-contractor, business partner, the Complainant may obtain the contact details of the IC through the notices published on all Organization premises.

TIAA GC is committed to the safety and dignity of its associates and has zero-tolerance towards such issues. Associates or aggrieved persons are therefore encouraged to report complaints as soon as possible and within the timelines prescribed under this policy, without fear of speaking up.

Role of the Respondent

To attend the formal meetings with the IC as and when required and to provide an honest, true, and accurate account of any situation that has been asked to comment on and to treat all matters with confidentiality.

Role of the Line Managers

- Ensure all issues reported of this nature are highlighted on an immediate basis to the designated mailbox.
- Encourage the associate to report the complaint or send the complaint on behalf of the associate.
- Make reasonable work adjustment or support as per request from the Complainant/Respondent
- Line Managers must not engage directly with the complainant or respondent regarding the complaint and are required to strictly adhere to the formal complaint and inquiry process as outlined under the policy.

Conciliation

The IC may, before initiating an inquiry and at the request of the Complainant, take steps to settle the matter between the Complainant and the Respondent through conciliation, provided that no monetary settlement shall be made as a basis of conciliation.

Managing Complaints – IC Inquiry

- Complainant should set out their formal complaint in writing and submit to the designated mailbox or IC Member. The IC will investigate the matter and deal with it in accordance with the provisions of law and internal policy as applicable.
- The IC shall conduct the inquiry in accordance with the principles of natural justice and process as per this policy and the Act.
- IC will conclude the inquiry within 90 calendar days of receipt of the written complaint.
- IC will share the inquiry report clearly outlining the outcome of the inquiry, the recommendations and the rationale for the decision reached, to the Organization within 10 calendar days of completing the inquiry. The recommendations may amongst others include issuing of a penalty (as outlined in disciplinary sanctions section).

- Organization will have 60 calendar days from receipt of the inquiry report to implement the recommendations of the IC and share the outcome with Complainant and Respondent along with a copy of the IC report.

The Complainant and Respondent are expected to attend IC meetings as and when the same are set up and are requested to keep the IC informed of any planned leaves to ensure the meetings and discussions are being set up at a convenient time. The IC is entitled to give an ex-parte decision or terminate the inquiry proceedings if the Complainant or the Respondent fails to appear before the IC for 3 consecutive hearings without sufficient cause.

All concerned parties are expected to co-operate with the IC and ensure adherence with the requirements of law and TIAA Code of Business Conduct Policy.

Disciplinary Sanctions

Pursuant to investigations, the IC may recommend disciplinary sanctions under circumstances such as:

- Where its investigation concludes that there was an incidence of/incidences of sexual harassment.
- Where an associate is found to have made a false or malicious accusation or produced false evidence to justify a complaint (for example, for the purpose of attempting to damage the reputation of a colleague or organization).
- Where a witness has given false evidence or produced false documents.
- Where an associate has breached their obligation to maintain confidentiality of information relating to the inquiry proceedings of the IC, by divulging information to an unauthorized person.

Indicative Recommendations of potential Disciplinary action

- a) Counseling
- b) A written apology/warning/reprimand or censure
- c) Withholding of promotion/increments
- d) Termination from service
- e) Disciplinary measures under applicable Organization's policies
- f) Such other actions as may be mentioned in the Act

Interim Measures

During the pendency of the inquiry, the Complainant is entitled to make a written request for transfer or request the transfer of the Respondent or leave for a period up to 3 months which

the IC members may take into account on a case to case basis. If the Respondent and the Complainant are in the direct line of reporting, the Respondent may also be restrained from reporting on work performances of the Complainant or from writing a confidential report by assigning the said tasks to another associate.

Confidentiality

Any information related to the conciliation, inquiry, recommendations, or action taken shall be kept confidential by the complainant, respondent, witnesses, and IC members and not be published, communicated, or made known to the public, press and media in any manner.

Regular Awareness & Training

To ensure a safe and respectful workplace, regular training and awareness sessions are conducted under the policy. These sessions aim to educate associates about what constitutes sexual harassment, the importance of respectful conduct, and the procedures for reporting concerns. All associates are encouraged to actively participate in these trainings to stay informed about their rights, responsibilities, and the organization's commitment to zero tolerance for any form of harassment.

POLICY ENFORCEMENT

As outlined in the TIAA Code of Business Conduct, all associates are expected to comply with applicable laws and regulations, as well as relevant policies that apply to TIAA business activities. Violation of this Policy may result in disciplinary action up to and including termination of employment.

TIAA GC reserves the right to modify, update, or discontinue the policy at any time without prior notice, as deemed necessary.

FURTHER INFORMATION AND SUPPORT

The Internal Committee can be contacted at POSHTIAAGCIndia@in.tiaa.org this email ID is a confidential ID created for the specific purpose of issues related to Sexual Harassment. Access to this email is limited to members of the IC only.

Alternatively, women associates may choose to lodge the complaint related to workplace sexual harassment through external online complaint management system “SHe- Box” portal which is initiated by Ministry of Women and Child Development.

If you have questions or concerns related to this policy, send an email to

POSHIAAGCIndia@in.tiaa.org

The Employee Assistance Program can provide free and confidential counselling and personal support. It can be accessed the following ways:

Contact Details: Toll free numbers [1800-258-8999](tel:1800-258-8999) & [1800-258-8121](tel:1800-258-8121) or Visit website at

www.1to1help.net

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Policy Owner	People Team- Risk, Governance & Controls Head'
Policy Approver	Chief Human Resources Officer

ANNEXURE I

Members of Mumbai IC

Name	Role - IC	Designation	Contact Number	Email
Deepika Reddy	Chairperson	Managing Director	9849550021	Deepika.Reddy@in.tiaa.org
Vivek Menon	IC Member	Managing Director	9820004619	Vivek.Menon@in.tiaa.org
Samrat Salian	IC Member	Managing Director	9930355575	Samrat.Salian@in.tiaa.org
Khushali Dave	IC Member	Senior Director	9867901574	Khushali.Dave@in.tiaa.org
Nikhil Kotian	IC Member	Senior Director	9820467368	Nikhil.Kotian@in.tiaa.org
Gurpreet Singh	IC Member	Senior Director	9867791427	Gurpreet.Singh@in.tiaa.org
Preeti Suresh Chawla	IC Member	Director	-	Preeti.Chawla@in.tiaa.org

Gayathiri Devi	IC Member	Director	8879343943	Gayathiri.Devi@in.tiaa.org
Harshit Akhilbhai Baxi	IC Member	Managing Director	9619699935	Harshit.Baxi@in.tiaa.org
Nidhi Kapoor	IC Member	Associate Director	8693866102	Nidhi.Kapoor@in.tiaa.org
Pratima Chandrasekhar	IC Member	Associate Director	9702999948	Pratima.Chandrasekhar@in.tiaa.org
Nallini Olivannan	External Member	-	9940050056	nallini@interweave.in

Members of Pune IC

Name	Role - IC	Designation	Contact Number	Email
Deepika Reddy	Chairperson	Managing Director	9849550021	Deepika.Reddy@in.tiaa.org
Shilpa Shyamlal Santwani	IC Member	Managing Director	9881726602	Shilpa.Santwani@in.tiaa.org
Piyush Relan	IC Member	Managing Director	9870046399	Piyush.Relan@in.tiaa.org
Abirami Sivagnanam	IC Member	Senior Director	8939360909	Abirami.Sivagnanam@in.tiaa.org
Ajit Pingle	IC Member	Senior Director	9880415806	Ajit.Pingle@in.tiaa.org
Sandip Patra	IC Member	Senior Director	9923333655	Sandip.Patra@in.tiaa.org
Jina Chetia	IC Member	Senior Director	9689922825	Jina.Chetia@in.tiaa.org
Nandini Khandelia	IC Member	Senior Director	9822903245	Nandini.Khandelia@in.tiaa.org
Soma Ghosh	IC Member	Director	8208756209	Soma.Ghosh@in.tiaa.org
Pradyumna Chavan	IC Member	Director	9689533067	Pradyumna.Chavan@in.tiaa.org
Nallini Olivannan	External Member	-	9940050056	nallini@interweave.in