



Environment Social Governance (ESG) Policy

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1. Background

Globally, there is an increase in awareness and activism amongst stakeholders who are demanding business accountability for the social and environmental impacts on issues such as climate change, gender equality, environmental degradation, etc. Sustainability Reporting is an emerging discipline encompassing the disclosure and communication of an entity's nonfinancial - environmental, social, governance (ESG) performance and its overall impact.

As we embark Can Fin homes journey on ESG, it is pertinent to realise that adaptation to the changing environment by playing a key role in minimising the overall impact of the business on ESG factors.

2. Overview

Can Fin Homes Limited ('CFHL') ('the Company') is registered with National Housing Bank (NHB) as Housing Finance Company. The Company has completed 36 successful years of operation in the field of home finance by way of loans for the construction or purchase of residential houses/ flats, commercial construction, loan for repairs and renovation of houses, plots loans, including mortgage loan in India.

The Company provides and maintains clean, healthy and safe working environment and strives to enhance standards of service delivery to customers. The main objective of the Company is by itself a big social responsibility of helping people to have a home of their own by providing loans for construction and/or purchase of dwelling units at competitive interest rates.

As the pioneer of retail housing finance in India, the Company stands committed to further increasing home ownership in the country. Since inception the Company believes in doing Business with moral values and principles and the Company has integrated its business and values to meet the expectations of its customers, employees, investors, value chain partners, stakeholders and society at large.

The Company's approach to sustainable growth is built on the belief that it can strengthen its business while also valuing the environment and its ecosystem. CFHL aims to achieve more sustainable outcomes as well as partner with customers, society and governments towards the achievement of the sustainable development goals. The Company believes that business success and sustainability-driven decisions go hand in hand and depends on the passion of its employees, shareholders and customers.

As an organization, CFHL aims to align its ESG approach with its strategic goals and the experience the Company seeks to offer all our stakeholders. ESG is an area of heightened focus and investment for us and has changed our outlook towards the business. This policy framework elucidates the Company's approach to align its business strategy, processes and disclosures with national and international ESG standards and frameworks.

The Environmental, Social Governance (ESG) framework reiterates the Company commitment to oversee and implement sustainable strategies, policies and practices as a responsible corporate citizen. The Company remains unwavering in its commitment to create values to stakeholders and drive a sustainable society and future.

SEBI vide Circular no. SEBI/HO/CFD/CMD-2/P/CIR/2021/562 dated May 10, 2021 mandated the filing of Business Responsibility and Sustainability Report (BRSR) for the top 1000 listed companies (by market capitalization) replacing the existing BRR with effect from the financial year 2022-2023. We had a BRSR policy approved by the Board currently we have included all

the aspects of BRSR policy in this ESG policy because we are broadening our scope on Environmental, Social Governance (ESG) policy. The BRSR policy forms part of this ESG policy.

3. Objectives

The objective of the policy is to articulate Company's commitment towards Environment, Social and ethical governance practices and long-term value creation for internal and external stakeholders of the Company viz., customers, employees, investors, regulators, business partners, community members, etc.

- ✚ The purpose of ESG Policy is to drive the Company's ESG strategy and integrate it with the core business strategy and to map the existing practices of the Company to be in line with Environmental, Social Governance (ESG) factors along with the applicable Laws, Rules, Regulations like Securities and Exchange Board of India (SEBI), i.e., Business Responsibility and Sustainability Report (BRSR), environmental laws, social laws, labor laws as well as rules and regulations prescribed by National Housing Bank (NHB), Reserve Bank of India (RBI) along with key frameworks and initiatives include the Global Reporting Initiative (GRI), the Sustainability Accounting Standards Board (SASB), and the Task Force on Climate-related Financial Disclosures (TCFD).
- ✚ The policy will also serve as a guide for sustainably conducting the operations, avoiding and minimizing environmentally adverse impacts, and implementation will provide an inclusive, safe and healthy working environment and promote the well-being of all the value chain partners and stakeholders.
- ✚ The Company will strive to incorporate ESG dimensions into its daily operations, based on the focus areas outlined in the ESG Policy.
- ✚ To raise awareness for environmental, social, and conservation issues. CFHL believe that together - we can make a difference and ensure a better future for generations to come.
- ✚ To assess our organization's sustainability and ethical performance and practices, we can identify areas that need improvement, and work towards making a positive impact

4. ESG Governance Structure, Roles and Responsibility



Board of Directors: As ESG (Environmental, Social, Governance) is an evolving area with varying standards and frameworks coupled with increasing focus and rising stakeholder expectations, the Company has decided to rely on the collective expertise of the entire Board of Directors to oversee its ESG framework. The Board will continue to have oversight on various aspects of ESG through the Risk Management Committee.

Executive Directors: The Executive Directors of the Company i.e., the Managing Director and CEO & the Deputy Managing Director/whole-time director(s) in charge are authorities responsible for the implementation of ESG goals of the Company.

Risk Management Department (RMD) & ESG Team: Team Comprising of DGMs, HRM Dept, Risk Dept, Training Dept, Premises Dept, Compliance and Secretarial Dept, have the overall responsibility of monitoring ethics, transparency, compliance, and human capital. Monitoring Human Capital including employee engagement, retention, recruitment, succession, planning, talent development, corporate culture, diversity, equity, inclusion, health, safety, and compensation programs, etc.

Roles & Responsibility of RMD section & ESG Team

Framing ESG Roadmap: Develop short-term and long-term ESG targets to set the Company's ESG roadmap for continuous improvement of performance. In case of any deviation from planned progress, identify the root cause and cause remedy to same.

ESG Risk Monitoring: The Company aims to recognize, evaluate, and handle environmental and social risks and opportunities, along with their effects, across all its operations and value chains. The company will integrate these practices into its business strategies and allocate the necessary resources to ensure successful implementation.

Review: The Company's ESG Policy shall be reviewed annually or as and when required. This Policy can be amended or modified in whole or in part, to reflect the latest national and global best practices, policy/regulatory directions/guidelines issued by regulators such as RBI, NHB, SEBI, and any other relevant statutory/regulatory authority.

Reporting: Measure business sustainability, identify relevant ESG KPIs, evaluate performance against each KPI, and report progress to stakeholders periodically along with the impact of the ESG Policy on an Annual basis through the BRSR Report.

Further, the internal Committee on ESG shall comprise the following

- General Manager
- Risk Management Head
- Compliance Head
- Products & Strategy Head
- Credit Head
- HRM head
- Premises Head
- Company Secretary.
- CSR Head

- Admin Head

This Committee along with the ESG team shall assist the Risk Management Committee of the Board in all respect for implementation of the ESG policy & framework.

Quorum & Compulsory attendance of Members of the internal Committee:

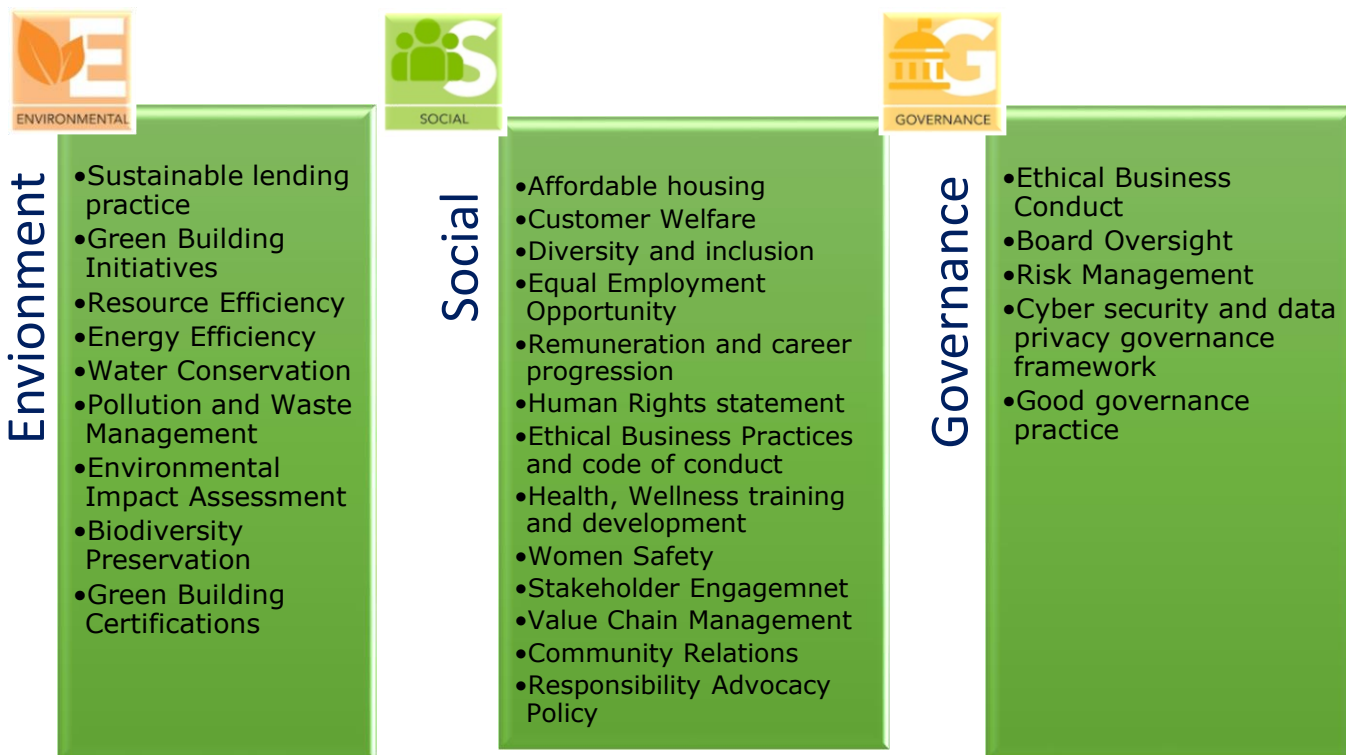
Quorum will be at least 50% of the number of members in the Committee.

Periodicity of meetings: At least once in a quarter.

Roles & Responsibility of the Committee:

- The Committee shall be responsible for evolving & framing ESG Policy & Framework and assist in reporting framework like in the Business Responsibility and Sustainability report.
- The Committee shall identify the roles and responsibilities of its value chain partners and stakeholders in formulating the Company's ESG policy & framework and training requirements.
- The Committee will assess whether the Company has successfully implemented the ESG framework within the given timeframe, and make recommendations for improvement if necessary.
- The Committee, will work together to generate fresh and innovative ideas. They will then meticulously analyze and deliberate on various feasible solutions to effectively overcome the challenges that may arise while implementing the ESG (Environmental, Social, Governance) framework. The ultimate goal is to ensure a seamless and successful implementation of the ESG framework.
- Identifying opportunities and target setting for improvement in the areas of emissions, Energy usage, water security, waste management and harnessing renewable energy sources.
- Scaling up workplace matters relating to Human Rights, ethical behavior and the Code of Conduct, Grievance handling, gender diversity, training and development, corporate Governance practices and stakeholder engagement.
- Identifying business opportunities to make products and services more inclusive by Suggesting the introduction of new products and services and meeting the Social aspirations addressing concerns on environment protection and climate risk.
- Suggest action plan towards reduction in resource utilization, like digitization of internal communication, credit processing proceeds and other such practices that can contribute to the ESG drive of the Company.

5. ESG Focus Areas



Environment (E)

- ✦ **Sustainable Lending Practices:** Incorporate environmental risk assessments in the lending process. Promote energy-efficient and eco-friendly construction practices. The Company has a guideline on sustainable lending practice under [Annexure-1](#)
- ✦ **Green Building Initiatives:** Encourage financing for green and sustainable building projects. Support initiatives that enhance energy efficiency and reduce carbon footprint. Details are covered in [Annexure 2](#)
- ✦ **Resource Efficiency:** Implement policies to reduce resource consumption within Company operations. Strive to minimize the environmental impact of office facilities and processes. Our goals are highlighted in [Annexure 3](#)
- ✦ **Energy Efficiency:** Promote and use buildings with energy-efficient features, such as proper insulation, energy-efficient appliances, and renewable energy sources. Promote use of sustainable construction materials that have a lower carbon footprint. We will strive to reduce our carbon footprint by taking on initiatives to monitor and reduce energy consumption. Our initiatives are illustrated in [Annexure 4](#)
- ✦ **Water Conservation:** Implement water-efficient landscaping and promote rainwater harvesting, install water-saving fixtures and appliances. It is essential because water is a finite resource, and many regions around the world face water scarcity or stress due to factors such as population growth, climate change, and inefficient water management. [Annexure 5](#)

- ✦ **Pollution and Waste Management:** Adopt pollution and waste reduction measures and awareness and recycling programs and pollution and waste management also emphasize reuse or recycle waste. [Annexure 6](#)
- ✦ **Environmental Impact Assessment (EIA):** Evaluate the potential environmental impact of the borrower's projects or activities. Consider the effects on air quality, water resources, soil, biodiversity, and ecosystems. To help in reducing the Environmental Impact Assessment (EIA) of construction by adopting sustainable practices and minimizing negative effects on the environment.
- ✦ **Biodiversity Preservation:** Incorporate green spaces and Green corridors, adopting practices that support local biodiversity.
- ✦ **Green Building Certifications:** Consider obtaining certifications to ensure adherence to sustainable building practices.

Social (S):

- ✦ **Affordable Housing:** Commit to supporting affordable housing initiatives including address housing needs in underserved communities.
- ✦ **Customer Welfare:** Ensure fair and transparent lending practices. Establish customer support mechanisms for financial education and assistance. We recognize that maintaining the trust and regard of our customers is important for Company's success and longevity. CFHL defines "engagement" as "the process of encouraging people to be actively involved and associated with Can Fin Homes. The Customer Engagement Policy is provided in the [Annexure 7](#)
- ✦ **Diversity and Inclusion:** Foster a diverse and inclusive workplace. Encourage diversity in hiring, training, and promotions. Adopt diversity and inclusion policies within the company. We believe that the satisfaction of employees is critical to the long-term success of the Company. The Company provides fair and equal employment and advancement opportunities to all employees and there will be no discrimination based on race, caste, color, age, sex, disability and socioeconomic status of the candidate. We ensure a fair recruitment process that helps us to identify and hire people with the right values, who are then groomed, encouraged and retained through a combination of financial and non-financial incentives. CFHL strives to foster a supportive and understanding environment in which all individuals realise their maximum potential regardless of their differences and where everyone can feel a sense of belonging. The Diversity & Inclusion policy is provided in the [Annexure-8](#)
- ✦ **Equal Employment Opportunity:** CFHL is an equal opportunity employer and the policy on Equal Employment Opportunity is provided in [Annexure 9](#).
- ✦ **Remuneration and career progression:** The Company endeavors to provide emoluments as per industry standards to the employees and fair opportunities for the employees to fill in higher roles. The Company has a succession planning process and measures the depth of the leadership bench at the Senior Leadership levels. The succession planning policy of the Company is given in the [Annexure-10](#).

- ✦ **Human Rights statement:** The Company is committed to respecting human rights. The Company strives to ensure that suppliers do not engage in any activities that are related to violation of human rights, child labour or forced labour. The Human Right statement is provided in [Annexure 11](#)
- ✦ **Ethical Business Practices and code of conduct:** Evaluate the company's commitment to ethical business practices. The Company also has a staff service regulations and online portal on human resources. It has a Code of conduct, which covers all aspects pertaining to employment and encourages principles of ethics, transparency, accountability and good corporate practices.
Further, the Company arranges training programs, conducts seminars for employees to abide by the Company's policies in true spirit. The Anti-bribery and Anti-Corruption Policy ("Policy") of Can Fin Homes Limited ("CFHL") has been developed in alignment with CFHL's code of conduct for employees, various policies including whistle blower policy, rules and regulations adopted by CFHL and is provided under [Annexure 12](#).
- ✦ **Health, Wellness training and development:** Company is committed to employee health and wellness, healthcare benefits, mental health support, and workplace wellness programs. In the endeavor to provide a safe work environment, the Company has a comprehensive suite of benefits, including insurance cover to employees and specially designed policies to meet the life-stage needs of women such as maternity leave, and in the process of proposing paternity leave, adopting crèche facility for women employees etc.
- ✦ **Women Safety:** The Company is committed to a workplace for women which is free of harassment or discrimination and has in place a mechanism for dealing with complaints on harassment or discrimination. Complaints, if any, will be addressed effectively with utmost sensitivity and confidentiality. The Company has a Policy on Prevention of Sexual Harassment as provided in the [Annexure 13](#).
- ✦ **Stakeholder Engagement:** We will evaluate the effectiveness of the company's engagement with stakeholders. Guided by the principle of inclusiveness and equal opportunity, the Company has a long-standing commitment towards creating a positive impact on marginalised segments of society. Company is engaged in activities in the areas of skill development, rural livelihoods and value chain development, creating sustainable economic ecosystems at the village level and undertaking environmental and social projects that address critical developmental gaps. The Company will continue to focus on CSR in compliance with applicable laws and regulations.

Being a provider of financial services, enabling access to finance to the socially marginalised segments of society will continue to be a part of its lending activities.

The Company believes in maintaining a transparent relationship with its stakeholders and holds regular interactions with them, including investors, employees, customers and regulators. The Company seek to enhance its practices and disclosures on ESG, with a focus on the material topics identified by stakeholders, on an ongoing basis.

By means of the Whistle Blower policy, the Company will continue to empower and encourage various stakeholders including employees to bring to the notice of the Company, any issue involving compromise/ violation of our code of conduct/ ethical norms, legal or statutory provisions without fear of reprisal, retaliation, discrimination or harassment. Chairman of the Audit Committee addresses these concerns by initiating

a thorough enquiry conducted by the appropriate authoritative body within the Company. The stakeholder engagement policy is provided in the [Annexure 14](#)

- ✦ **Supply Chain Management:** Evaluate the social practices of our value chain partners, suppliers and contractors. Assess risks related to child labor, forced labor, and unethical practices in the supply chain.
- ✦ **Community Relations:** Assess the impact of the Company's operations on local communities. Evaluate community engagement efforts and the Company's contribution to community development.
- ✦ **Responsible Advocacy:** The Company has a Policy on Responsible Advocacy provided under [Annexure 15](#) which specifies the guidelines followed by the employees and others partners & associates in the advocacy activities with internal and external stakeholders.

Governance (G):

- ✦ **Ethical Business Conduct:** Promote a strong ethical culture within the company. Uphold integrity, honesty, and compliance with laws and regulations.
- ✦ **Board Oversight:** Clearly define the roles and responsibilities of the board in overseeing ESG matters. Establish Committees to focus on specific aspects of ESG performance.
- ✦ **Risk Management:** Integrate ESG risk assessments into overall risk management processes. Regularly review and update risk management policies.
- ✦ **Cyber security and data privacy governance framework:** The Company's cyber-security and data privacy governance encompasses management oversight at various levels through Executive Committees, Information Technology Strategy Committee of the Board with the ultimate responsibility assumed by the Board of Directors. The Company follows a comprehensive 360-degree approach to cyber security with the triad of Confidentiality, Integrity and Availability (CIA) at the heart of the information security framework. The approach covers all aspects of prevention, detection and response.
- ✦ **Good Governance practices:** We are committed to maintain the highest levels of ethical standards of integrity, corporate governance and regulatory compliance. These parameters form the bedrock of our corporate governance policy. We have proactively upheld good governance practices and are constantly striving to enhance our standards. Our Board of Directors are responsible for setting the course for, and evaluating the Company's performance with regards to corporate governance. The parameters of evaluation include compliance, internal control, risk management, information and cyber security, customer service, social & environmental responsibility.

The Company's corporate governance framework complies with the The Companies Act, the regulations and guidelines of the Reserve Bank of India/National Housing Bank, the Securities and Exchange Board of India ("SEBI") and the requirements of the listing agreements entered into, with the Indian stock exchanges.

CFHL follows fair play rules by following ethical practices while doing business. The Fair Competition policy of the Company is provided under [Annexure 16](#).

Annexure 1: Sustainable lending Practice policy

Sustainable lending policy is Can Fin Homes's initiative to encourage and support environmentally sustainable projects and activities. The goal of green financing is to channel funds towards projects/parts of the project that have positive environmental impacts, such as renewable energy, energy efficiency, sustainable infrastructure, and other eco-friendly initiatives, etc.

The Company is committed to creating a positive impact through its business founded on the values of respecting human life and addressing the challenges to the environment. The Company supports capacity creation in sustainable sectors like renewable energy, waste management and energy efficiency. The Company will be aligned to national goals and targets in the nation's collective transition to a low-carbon economy.

- ✚ **Environmental Impact:** Can Fin will focus on sustainable lending/financing projects and businesses that have a positive impact on the environment. This includes promoting investments in renewable energy, energy efficiency, sustainable agriculture, and other eco-friendly initiatives involved in construction. The Company is committed to promoting sustainable sourcing of inputs for construction-related activities and is working towards building a brighter and greener future.
- ✚ **Social Responsibility:** Can Fin will also consider the social impact of their loans by supporting projects that contribute to community development, poverty alleviation, and social well-being. This could involve financing affordable housing, and its CSR initiatives in healthcare facilities, or education initiatives.
- ✚ **Ethical Practices:** Sustainable lending is a responsible approach that involves thoroughly evaluating the ethical practices of potential borrowers. As part of this approach, our company is committed to refraining from providing loans to any individuals or organizations engaged in activities that include child labor, forced labor, illegal activities, and other unethical practices. By upholding these standards, we strive to promote sustainable and socially responsible lending practices that benefit both our clients and the wider community.
- ✚ **Stakeholder Engagement:** Sustainable lending is an approach that emphasizes the importance of social and environmental sustainability principles in the lending process. For this reason, it is crucial to engage with stakeholders such as customers, investors, and the community to ensure that their projects align with sustainable practices. To achieve this, we shall implement a feedback mechanism that collects input from these groups during the last disbursement. This feedback mechanism will serve to gather insights on how well the project aligns with sustainability principles and areas for improvement. The purpose of the feedback mechanism is to promote transparency, accountability, and collaboration between the lending institution and stakeholders.

This approach will prioritize sustainability as it aligns with the movement towards responsible and ethical lending practice.

Annexure 2: Green Building initiatives policy

The company is dedicated to conducting its business sustainably and efficiently, to reduce its facilities' environmental impact. The company's primary focus areas include digitization, energy conservation, water conservation, waste management, and sustainable procurement. The company invests in providing digital solutions to customers and encourages their adoption, thereby reducing paper usage. The company also promotes the digitization of its operations.

The company is committed to maintaining sustainable and environmentally friendly workplaces wherever possible. This is achieved by utilizing energy-efficient lighting and equipment in its branches and offices, as well as implementing measures to optimize equipment capacity. Furthermore, the company intends to increase its use of renewable energy sources wherever feasible.

The Company is dedicated to combating climate change and reducing its environmental impact. To achieve this, it aims to set clear, measurable targets for reducing emissions, reducing emissions intensity, or achieving carbon neutrality, where reduction is not feasible, by offsetting it.

These targets will be established within a specific time frame, ensuring that progress is made towards a more sustainable future. CFHL is having 16 branches that are solar-powered and we are focusing on having more such branches which can contribute to our goals.

We will provide guidance on incorporating sustainable design principles from the outset, taking into account factors such as energy efficiency, the use of renewable materials, minimizing waste, and optimizing building orientation to maximize natural light and reduce the need for artificial lighting and heating. Our goal is to help our stakeholders create buildings and structures that are not only functional and aesthetically pleasing but also contribute to a more sustainable future for our planet.

Annexure 3: Resource Efficiency policy

The Company is committed to conducting its business sustainably and efficiently, thereby reducing the environmental impact in its facilities. The key areas of focus are digitization, energy conservation, water conservation, waste management, and sustainable procurement.

The Company is investing in providing digital solutions to customers and encourages their adoption, thereby reducing the usage of paper. The Company is also promoting digitization of internal work and operations.

The Company is committed to protecting the environment by minimizing its impact on the planet. To achieve this, it is actively promoting the use of sustainable products and services in all aspects of its operations. This includes sourcing materials and inputs that are eco-friendly and support sustainable practices. The company is also taking steps to ensure that its suppliers and partners share its values and commitment to sustainability.

By prioritizing sustainability, the Company aspires to take initiatives for:

- a) Single-use plastic will be phased out and plastic use will be reduced in offices and branches as much as possible.
- b) Our goal is to make our offices and branches eco-friendly, and we're actively working towards achieving it.
- c) Reducing paperwork with digitized operations and automation.
- d) Printing and photocopying operations by employees across offices and branches will also continue to be monitored and regulated to reduce the wastage of paper.
- e) The Company has introduced e-Board/ Committee meetings which are conducted in a completely paperless manner thus making significant efforts to reduce the consumption of resources, specifically paper, wherever it can.
- f) Promoting sustainability by providing training and awareness programs among our employees, value chain partners and stakeholders.
- g) Supporting the transition to renewable/clean energy

Annexure 4: Energy Efficiency policy

To tackle the pressing issue of climate change and promote a sustainable future, we recognize the importance of addressing energy and emissions. As such, we are dedicated to minimizing our carbon footprint and will be undertaking various initiatives to closely monitor and reduce our energy consumption. Our initiatives will be targeted towards:

- a) Installing LED lights across all offices and Branches which consumes less power
Procurement of Energy Saving Green IT Equipment
- b) Implementing automated energy management solutions to reduce energy consumption
- c) Retrofitting existing high energy-consuming devices and equipment to maximize performance while consuming less electricity
- d) Disposal of waste of IT assets in to an authorized dealer in an environment-friendly way.

Annexure 5: Water Conservation policy

Water conservation is a critical practice that involves the responsible and sustainable use of water resources. The practice is essential because water is a finite resource, and many regions around the world are facing water scarcity or stress due to various factors. Climate change is another critical factor affecting water availability. As the climate changes, precipitation patterns shift, resulting in more frequent and severe droughts in some areas. This, in turn, exacerbates water scarcity and puts a strain on water resources.

Inefficient water management practices also contribute to water stress. Many regions around the world use outdated infrastructure that results in significant water loss through leaks and evaporation. This results in wasted water that could otherwise be used to meet the needs of people and ecosystems. Here are small initiatives that if adopted can contribute to water conservation. CFHL promote below listed key points in daily operations and raise awareness among stakeholders.

- a) **Rainwater Harvesting:** Collecting rainwater for later use in gardens or for non-potable household purposes. Installing rain barrels or cisterns to capture rainwater from rooftops.
- b) **Public Awareness and Education:** Promoting water conservation practices at the community level. Educating people about the importance of water conservation and ways to reduce water usage.
- c) **Reuse and Recycling:** Treating and reusing wastewater for non-potable purposes. Implementing water recycling systems across its operations.
- d) **Personal Responsibility:** Encouraging all our staff, individuals, value chain partners, community around us to be mindful of their water usage at home and daily activities
- e) **Innovative Technologies:** Exploring investing in and adopting technologies that improve water efficiency in various sectors.

Water conservation is a shared responsibility that involves individuals, communities and governments working together to ensure the sustainable use of this precious resource. By adopting water-saving practices and technologies, we can contribute to the preservation of water ecosystems and address the challenges posed by water scarcity.

Annexure 6: Pollution and Waste Management policy

Every year, the company takes a comprehensive approach to accounting for its greenhouse gas (GHG) emissions. It measures, externally verifies and publicly discloses this data in accordance with the GHG Protocol Corporate Accounting Standards. The company recognizes the importance of playing an active role in combating climate change and transitioning to a low-carbon economy. As a result, it has committed to striving towards carbon neutrality. To achieve this, the company will prioritize reducing its carbon footprint wherever possible. When it is not feasible to reduce emissions, it will offset them through other means.

India has a comprehensive legal framework for waste management, and various laws and rules address different aspects of waste management, including solid waste. However, India has been actively working on solid waste management, and there may have been developments. In light of this the Company shall make efforts to dispose of waste most responsibly.

- a) Across all our branches, including the Registered Office, we segregate dry, wet, and sanitary waste.
- b) Single-use plastic is prohibited to the extent possible across all our branches. The management is promoting environment-friendly initiatives. The Company discourages the usage of plastic cups, bottles and straws for beverages and instead has distributed ceramic coffee mugs to all the employees and reusable cutlery is used in the cafeteria.
- c) The Company will strive to reduce the use of all forms of plastic in its offices, and branches as well as in its promotional, marketing and outreach events.
- d) Apart from dry and wet waste, management is cautious of handling other wastes like E-waste, hazardous waste, ensuring safe handling, transportation, and disposal. E-wastes are to be outsourced to the vendor which can dispose of the wastes as per the proper waste disposal mechanism.
- e) The old papers and documents are scrapped in such a manner that they may be recycled.
- f) We promote the Swachh Bharat Mission (Urban and Gramin). It is a nationwide campaign that includes initiatives for solid waste management, sanitation, and cleanliness.
- g) The Company is conscious of paper usage in its operations, transactions and customer communications. Our push to go digital would help to reduce paper consumption, thereby reducing paper waste.
- h) Printing and photocopying operations by employees across offices and branches will also continue to be monitored and regulated to reduce the wastage of paper.
- i) The Company has introduced e-Board/ Committee meetings which are conducted in a completely paperless manner thus making significant efforts to reduce the consumption of resources, specifically paper, wherever it can.

Annexure-7: Customer Engagement Policy

Under this Policy CFHL defines “engagement” as “the process of encouraging people to be actively involved and associated with Can Fin Homes.

CFHL is aware of the ongoing legal responsibilities as per the laws of our country. The main focus of the policy is to ensure that customer's voice is heard at every level of the organization, both on a formal or informal basis, as individuals or as members of groups, at a level that is comfortable and at a pace that can be determined.

Acquiring a new customer is much costlier than retaining an existing one and hence, it is essential to build customer engagement and loyalty. This can be achieved in the following ways:

Deciding the range of ways for customers to become associated with CFHL for existing and future service quality and standards.

Relationships are based on openness, honesty, and transparency. Use of digital channels and emerging technologies correctly.

CFHL should consider customers’ views if found viable and feasible, while making decisions across all aspects of service delivery and ensure that the outcome from customer engagement is reported through our governance structure and back to all our customers.

CFHL needs to understand the needs, requirements and experience of the customers to consider the same. This applies to the process of customer engagement as much as it does to the services provided by us. There may be barriers that get in the way of effective engagement. To involve and include more customers, CFHL needs to identify ways to widen access to catering to their different requirements and interests.

CFHL to undertake periodic survey exercises to give some insights about the satisfaction with its services, as a starting point. The survey elicits information about its customers about the experience of the services that have been delivered.

Customer feedback via electronic media will facilitate CFHL to gauge their views and response for taking corrective steps, wherever necessary.

Events may be held to promote a service, support environmental improvements, provide information, consult on a major issue, or for social/community reasons.

CFHL understands that clear and timely information is key to establishing a trustworthy relationship with customers.

All prevailing regulatory/legal/statutory compliances, as applicable and modified from time to time need to be adhered to within the prescribed time frame, if any.

The Policy shall be reviewed periodically for its appropriateness and to be updated as and when found necessary.

Annexure-8: Diversity and Inclusion Policy

Can Fin Homes Limited ("CFHL") aims to create an inclusive workplace and leverage the power of diversity for sustainable competitive advantage, economic growth and societal progress. Employees from different backgrounds should be able to function without any barriers and with equal opportunities to participate, develop, and contribute freely and equitably.

The objective of this policy is to:

- To ensure that CFHL continues to be an employer for all diversity groups- gender identity, disability, caste, creed, colour, religion, marital status, age, sexual orientation and expression, medical condition, language and any other aspects as applicable.
- To create an environment that has zero tolerance for discrimination. Discrimination against any employee on any of the above grounds is prohibited and equal prospects are made available.
- To create and foster an open culture of inclusion for all its stakeholders, including all employees (whether permanent, fixed term or temporary), business partners, vendors, suppliers, consultants, contractual staff, trainees, direct selling agents, and any other person/entity acting directly or indirectly for and on behalf of CFHL.

The basis for recruitment, development, training, compensation and advancement of employees at CFHL shall solely be based on qualifications, performance, skills, experience, expertise, potential, and discipline and there shall be no other extraneous criteria of differentiation.

CFHL follows the principle of equal pay and terms of employment (including benefits, training, promotions, performance reviews, transfers, exits, etc.) without any bias. CFHL believes that all its employees should receive equal pay where they are carrying out similar work, work rated as equivalent or work of equal value.

All employees and stakeholders of CFHL shall be always treated with dignity and respect. There is no tolerance for disrespectful or inappropriate behavior, unfair treatment or retaliation of any kind. Harassment (physical, verbal or mental harassment) is not tolerated in the workplace and in any work-related circumstances outside of work.

CFHL inculcates awareness amongst its employees through educational sessions and by forming internal groups to promote diversity among employees.

Appropriate disciplinary/ legal action will be taken against any employee/personnel who violates this policy. Based on the seriousness of the offense, disciplinary action against an employee may include verbal or written reprimand, warning, suspension or termination of employment.

No reprisal or retaliatory action will be taken against any individual for raising concerns as regards this policy. However, any such reporting by an employee if found to be in bad faith or in a false or frivolous manner, will be considered a violation of the code of conduct, and such employee may be subject to disciplinary action.

CFHL respects the privacy of every individual and ensures utmost secrecy and confidentiality of information/concerns concerning disability/ sexuality/ gender identity or any other personal

information shared with it by its employees (or potential candidates). However, if any disclosure is mandated under law, then any such disclosure will be handled with utmost confidentiality and under applicable laws.

Annexure 9: Equal Employment Opportunity Policy

Introduction:

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.

This Policy is applicable to Can Fin Homes Ltd. employees and its operations. The Company shall ensure that systems and processes are in place on the following:

(a) Facility & amenity provided to the persons with disabilities:

To treat differently abled persons equally with its other employees, to provide appropriate facilities and amenities to persons with disabilities to enable them to effectively discharge their duties in the establishment.

To provide the facilities & amenities, relating to accessibility & movement including for drinking water, toilet, parking, seating arrangement etc., priority in handling the issues / matters concerning PwDs.

(b) List of posts identified suitable for persons with disabilities in the Company.

To identify the posts suitable for persons with disabilities in the Company. Accordingly, the PwDs, found suitable and required numbers, are identified for recruitment in the post / cadre of Assistants & Junior Officers and to place them at Offices, to enable them to comfortably / conveniently attend & discharge their duties / works. The nature of works suitable like relating to Accounting; Processing of papers, etc., which may be revised from time to time may be considered. The Managing Director / Deputy Managing Director (in the absence of the Managing Director) is authorized to identify the suitable posts for persons with disabilities from time to time.

(c) The manner of selection of persons with disabilities for various posts:

To give equal opportunity to the persons with disabilities, if found suitable, at all stages of employment in the Company, including recruitments, selections and promotions and also to participate, perform and excel in their work on an equal basis in everyday life.

A column in the Application form for the above process is provided seeking information if the applicant is a person with disability and if so, nature of disability and specific needs, if any.

(d) Post-Recruitment and pre-promotion Training facility:

To organize Training programs from time to time for upgradation of their skill with regard to their employment, based on requirement. Also, to provide Pre- Promotion and post-promotion training to such PwDs, depending upon their requirements.

(e) Preference in Transfer and posting:

To Provide preference in transfer and posting, subject to their suitability and availability. The exemptions from mandatory serving / compulsory transfers as per H R policy shall also be looked into, keeping in view the convenience of PwDs & administrative exigencies.

(f) Special Leave, preference in allotment of residential accommodation if any, and other facilities:

To provide Special leave, Preference in allotment of residential accommodation, if any, and other facilities to PwDs.

(g) Provisions for assistive devices, barrier-free accessibility:

To provide an accessible environment and availability of assistive devices, subject to regulatory guidelines, availability of devices, administrative constraint, as required. To specify, providing crutches; specially made shoes; wheel chairs etc., depending upon the requirement.

(h) Appointment of Liaison Officer by the Company:

To 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. Executive in the cadre of Asst. General Manager or above shall be the Liaison Officer for the purpose.

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. He shall also be empowered/authorized to implement/lay down operational guidelines to ensure that the applicable provisions of the RPwD Act and rules. The provisions/such guidelines shall be subject to the provisions under CFHL Staff Service regulations, the qualifications and merit of the individual.

The Managing Director or the Deputy Managing Director in the absence of the Managing Director shall be the Final Authority to nominate any other Executive / Official 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 in the website or at any conspicuous place in the Registered Office premises.

Responsibility:

Every employee of the Company is responsible to give effect to this policy. If any employee violates this Policy, or discriminates any person with disability, or renders any harassment to such person, he/she shall be dealt with under the provisions of the Service Regulations of the Company. The Company shall maintain records of the persons with disabilities in relation to matter of employment, facilities provided and other necessary information in compliance with the provisions of this policy.

Maintenance of Record [Physical / Electronic] (Pursuant to Rule 9 of R PwD's Act, 2016 and related Rules)

Sl. No.	Name	Address and Phone No.	Gender	Date of Birth	Joining Date	Nature of Disability	Nature of the Work	Facility Provided

Total No. of Persons with Disabilities employed under Can Fin Homes Ltd.								

Annexure-10: Succession Planning Policy

Background:

Succession planning refers to the process of filling positions at the senior level in the organisation such as Board, Senior Management and other key roles Identification, assessment of their potential and development of suitable candidates for the said roles is the objective of succession planning. Essentially, the concentration is on training and mentoring them to take up higher responsibilities, when required, to facilitate smooth succession without hindering the operational efficacy of the institution.

The Policy of Succession planning envisages the strategy of continuously grooming the employees in consonance with their skills and talent to mitigate attrition related risks like Vacancy, Readiness and Transition.

As per the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, the Board of Directors should oversee the succession planning and ensure that plans are in place for proper succession of appointments for the Board and the Senior Management.

1. Applicability:

The main focus of the Policy will be on the Succession Planning at the Board and Senior Management level.

"Executive Board" shall mean and include Whole-time Directors appointed by the Board/ Shareholders.

'Senior Management' shall mean and include the following: Management Executives (i.e., employees one level below the Board), KMPs (other than whole-time director); Chief Investor Relations Officer, Chief Information Technology Officer; Chief Risk Officer and any other person at the discretion of the Nomination and Remuneration Committee ('NRC') as defined in the HR policy of the Company.

3.Objectives:

- a) To ensure that the business of the Company is not adversely affected or hampered on account of superannuation, voluntary retirement, resignation, death or permanent incapacitation or sudden exit of any Member of the Board, Senior Management or any other employee covered under this Policy.

- b) To create a talent pool of high potential personnel, who will be suitable for appointment at the Board and Senior Management positions and to groom them to assume specific roles as and when required.
- c) To ensure qualitative and timely replacements for high level personnel in the Board and Senior management

4. Implementation Process:

A. Positions at the Directors level:

The responsibility of ensuring timely replacement for positions of any Director, lies with the NRC Committee.

For vacancies in the Executive Board, the NRC in consultation with the Chairman and other Members of the Executive Board, shall recommend the name(s) of the candidate(s) (whether internal or external) who have the necessary qualifications, qualities and traits for such position(s).

For other vacancies in the Board, the NRC shall identify and recommend name(s) of the candidate(s) with requisite qualifications and characteristics for being considered for such position(s).

The NRC shall undertake a process of due diligence to determine the suitability of the person for appointment/re-appointment /continuation as a Director on the Board, based upon qualification, expertise, track record, integrity and other 'fit and proper criteria.

In the event of any unexpected vacancy in the Executive Board, NRC shall meet and appoint from the identified pool of persons to take charge of the said position either on an interim basis or on permanent basis.

B. Positions at the Senior Management and other critical positions:

The Executive Board should review the vacancies, if any, at Senior Management level and other critical positions at least once a year. On the basis of such requirements. an appropriate action plan should be drawn and adopted.

Such action plan, in the first instance, should consider the identification and short listing of an employee within the same location/function through a lateral transfer of an employee from another location/function. In case of non- availability, alternatively, the plan should consider selection of an external candidate having the required skills, experience, leadership quality and expertise, necessary for the said position.

The Executive Board should ensure that the external candidate fits into the work culture and ethics of organization and also has the ability to lead the team by example, work and motivate them, have a congenial rapport with the Members of the Senior Management and other staff members.

It is also imperative to have a contingency plan in place to deal with sudden exits at the said Senior Management level. The Human Resource Department of the Company should identify a select pool of employees who can be trained to occupy senior level positions in case of any such eventuality for handling responsibilities.

In addition to the above indicated key positions, there should be succession plans for the functional business heads like the Cluster and Branch Manager and the persons heading / handling various departments/ sections in the Registered Office, as well.

Succession planning entails the following:

Identification of employees who possess the potential needed for assuming the higher rungs of leadership within their branch/ department.

Outline the plan of action in reasonable span of 6 months to a year in order to prepare and groom identified staff to assume and discharge elevated responsibility in the future.

Based on the above review process, the Executive Board should give its consent to implement the succession plan for the concerned Region/Branch/Function, within a definite time frame.

Executives and concerned officials responsible for execution of the Succession Planning Policy should ensure confidentiality in respect of the discussions and decisions regarding the prospective candidate. The information should be shared, if and when required, only with the concerned candidate, in order to prepare him for such elevation.

Amendments and modifications to this Policy may be made from time to time to be in conformity with the regulatory guidelines, listing regulations or Board directions from time to time.

Annexure-11: Human Rights Statement

As one of its core values, Can Fin Homes Limited ("CFHL") supports, protects and promotes human rights and ensures that fair, ethical business and employment practices are followed.

CFHL is committed to the compliance of all applicable employment, labour and human rights laws. This Statement applies to all stakeholders of CFHL, including employees (whether permanent, contractual or temporary), Directors, business partners, vendors, suppliers, consultants, trainees, direct selling agents, or any other person / entity acting for and on behalf of CFHL.

This Statement sets out the broad framework to ensure that all stakeholders are treated with utmost respect and dignity and conveys the fact that CFHL does not condone human rights violations or abuses.

CFHL is committed to maintain a safe, harmonious business environment and workplace for everyone, irrespective of caste, region, gender, religion, disability, qualifications, background etc. CFHL 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, CFHL has strived to provide reasonable safeguards for the benefit of employees while having due regard for their privacy and dignity.

CFHL prohibits all forms of slavery, coerced labour, child labour, human trafficking, physical/sexual violence etc.

The protection of CFHL's brand, reputation, trust as an institution which promotes and protect human rights is imperative. Any non-compliance or adherence to the practice of human by any employee or any other stakeholders is likely to invoke appropriate disciplinary /punitive action.

Annexure-12: Anti-Bribery and Anti-Corruption Policy

The Anti-bribery and Anti-Corruption Policy ("Policy") of Can Fin Homes Limited ("CFHL") has been developed in alignment with CFHL's code of conduct for employees, various policies including whistle blower policy, rules and regulations adopted by CFHL.

The Policy emphasizes CFHL's zero tolerance towards bribery and corruption malpractices and reflects its commitment to maintain highest ethical standards undertake open and fair business culture, follow the best practices of corporate governance and enhance CFHL's reputation at appropriate levels.

The Policy provides necessary information and guidance on how to recognize and deal with bribery and corruption issues. It applies to all stakeholders, or any other person associated with CFHL such as individuals, directors, employees working at all levels and grades (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 CFHL.

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 favour or advantage.

With respect to Bribes:

- CFHL prohibits all forms of Bribery and corruption practices.
- CFHL conducts its business lawfully and ethically and also expects every stakeholder to conduct its business with integrity.
- CFHL prohibits giving or accepting of any kind of favours to facilitate or expedite official business or work.
- CFHL may make charitable donations that are legal and ethical as per rules, powers and practices, duly ensuring that the charity or a support is for a legitimate cause and that donations are not being used as a channel for Bribery.
- CFHL does not make contributions to any political party or politicians. Stakeholders must not use CFHL's name or trademark for political activities of any kind or provide money or other forms of support to political parties on behalf of CFHL.

Illustrative list of acts / practices that are restricted / prohibited under this Policy shall include but not be limited to:

- Dishonest misappropriation of property/money, criminal breach of trust and cheating, as defined under Indian Penal Code 1860 ("IPC");
- Receiving or giving bribe.
- Acceptance / giving of gifts over and above the extent and the manner as provided under the Company Rules / Regulations.

- Charity in order to obtain commercial advantages.
- Participation / contribution in / to political activities.
- Any other unethical act or omission.

CFHL shall keep books, records and accounts in reasonable detail that accurately and fairly reflect all transactions and disposition of CFHL's assets.

CFHL shall maintain internal controls to prevent and detect potential violations of this Policy.

All Stakeholders are encouraged to raise concerns about any issue or suspicion of non-compliance with this Policy on hrm@canfinhomes.com.

CFHL will investigate all allegations relating to corruption and Bribery and take legal/disciplinary action as may be deemed appropriate.

Any use of the reporting procedures in bad faith or in a false or frivolous manner will be considered a violation of the code of conduct, and the reporter may be subject to legal/disciplinary action.

CFHL ensures that it has adequate procedures to combat threats relating to bribery and corruption. Accordingly, CFHL provides appropriate training for its employees on prevalent anti-bribery & anti-corruption laws, their role and importance.

A copy of this Policy is available on CFHL's website, www.canfinhomes.com

Annexure-13: 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, (Prevention prohibition and redressal Act) 2013' and rules framed thereunder. Any clarifications pertaining to the policy, reference shall be made to the Act and rules enacted by Government of India.

The Company promote Gender equality among employees and will not tolerate or entertain any form of harassment or discrimination lashed out at the 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 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 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 comes under the definition of sexual harassment shall be covered under this policy and all inquiries shall be tried at Registered 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 coloured 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 affect her/his performance and has sexual connotation/ overtone/ nature.
- i. Teasing, innuendos and taunts, physical confinement and /or touching against one's will and likely to intrude upon one's privacy.

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

- 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.
- An alleged act of Sexual Harassment committed during or outside of office hours falls under the purview of this policy.

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 a complaint of sexual harassment has been made by the aggrieved woman.

4. Employee: A person employed at the workplace, 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 coworker, a contract worker, probationer, trainee, apprentice or by any other such name.

5. Workplace: In addition to the place of work [Head office / Branch offices] 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 Can Fin Homes Ltd.

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.

D. Internal Complaint Committee:

- I. The Managing Director of the Company shall constitute an Internal Complaint Committee (ICC). The ICC shall comprise the following:

- Equal representation of men and women on the ICC where one half of the total members are women.
 - A senior level woman Employee shall be appointed as the Presiding Officer of the ICC preferably a lady Executive, in any case
 - Minimum two members of the ICC will be appointed from amongst employees who are preferably committed to the cause of women or who have had experience in social work or have legal knowledge in this field.
 - One member may be considered from amongst non-governmental organizations or associations committed to the cause of women or a person familiar with the issues relating to Sexual Harassment such member shall be paid a honorarium of Rs.2500/- on disposal of each complaint.
- II. The Presiding Officer and every member of the ICC shall hold office for a period not exceeding three years, from the date of their nomination.
 - III. If the Senior Level woman employee is not available, the presiding officer shall be nominated from any other workplace of the same employer or other department or organization.
 - IV. A member of the ICC may resign at any time by tendering his/her resignation in writing to 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, 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 the women for making the complaint in writing.
- IV. If the Aggrieved Individual is unable to make a complaint on account of his/her mental or physical incapacity, a complaint may be filed by:
 - His/her relative or friend; or
 - His/her co-worker; or
 - Any person either psychiatrist, guardian, authority or special educator who has knowledge of the incident, with the written consent of the Aggrieved Individual or under whose care he/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 his/ her written consent.

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 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 terms of settlement which were arrived at, then the ICC shall proceed with inquiry or could forward the complaint to the police.

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

G. Manner of Inquiry into Complaint:

- I. Complainant should submit the complaint along with supporting documents and the names of the witnesses.
- 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 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 conciliation process and inquiry will be done simultaneously and will be completed within 90 days. During the inquiry the Complaints Committee may give directions relating to procedure that, in its opinion, will reduce the delay and will help to achieve a prompt hearing of the complaint.
- IX. On completion of an inquiry a report would be submitted by the ICC to the Managing Director within 10 days. The report will contain outline of the case, investigation process, conclusion based on the balance of probabilities, findings based thereof and recommendations.
- X. The ICC shall share a copy of the findings of the inquiry with the aggrieved person and the respondent.
- XI. If any party is not satisfied or further aggrieved by the implementation or non-implementation of the recommendations passed by the Committee, either of the party may file an appeal before the appellate authority in accordance with Act and the rules, within 90 days of the recommendations being communicated.
- XII. If the Committee arrives at a conclusion that the allegation against the respondent has not been proved, it should recommend to the Managing Director that no action is required to be taken in this matter.

H. Interim Relief to the Aggrieved Woman:

During pendency of the inquiry, on a written request made by the complainant, the Committee may recommend to the Managing Director to –

- Transfer the complainant or the respondent to any other workplace.
- Grant leave to the aggrieved woman of maximum 3 months, in addition to the leave she would be otherwise entitled.
- Prevent the respondent from assessing complainant's work performance.
- Grant such other relief as may be appropriate.

Once the recommendations of interim relief are implemented, the Managing Director 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 proved, the Committee shall recommend the Managing Director

- i. To take action for sexual harassment as a misconduct as mentioned in the Service Regulations of Can Fin Homes Ltd.
- ii. To deduct from the salary or wages of the respondent such sum it may consider appropriate to be paid to the aggrieved woman or her legal heirs.

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 harassments; and the order constituting the ICC.

- iii. Declare names and contact details of all members of the ICC.

INTERNAL COMPLAINTS COMMITTEE AT CAN FIN HOMES LIMITED				
Sl.No.	Position	Name	Phone No.	E-Mail Id.
1.	Presiding Officer			
2.	Member			
3.	Member			
4.	External Member			

- iv. Organize workshops and awareness programs at regular intervals for sensitizing the employees with the provisions of the 2013 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 respondent and witnesses before the ICC and make available such information to the ICC in 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 offence under the IPC 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 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.

Annexure-14: Stakeholder Engagement Policy

Can Fin Homes Limited (CFHL) recognizes that effective stakeholder engagement is an essential component of our business operations to be undertaken at business and site level. It is an important mechanism to understand stakeholders and their needs, involve them in managing risks and resolving conflicts at an early stage, thus ensuring a long term 'social license to operate' for a business.

CFHL endeavours to achieve this by:

- Maintaining positive legal compliance to applicable stakeholder engagements, disclosure regulations and conforming with the requirements of the Can Fin Homes Sustainability Framework.
- Ascertaining the nature of impact on stakeholders, their legitimate concerns, interests and expectations as well as their potential influence on Can Fin Homes for analysing the implications of those factors on business operations.
- Embedding the principles of inclusiveness, transparency, materiality, completeness and cultural appropriateness in all our engagement activities.
- Seeking to disclose information about the company's activities in a timely and culturally

- appropriate manner to enable informed and meaningful engagement.
- Resolving stakeholder grievances in a timely and culturally appropriate 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 periodically for its suitability and updated as necessary.

Annexure 15: Responsibility Advocacy Policy

Advocacy refers to the activities performed while interfacing with a wide range of stakeholders such as Government agencies, non-governmental organisations, academic and research institutions, associations at local, national, and international levels and individuals with the objective of influencing policy, regulations and other decision making endeavours.

Can Fin Homes Limited (CFHL) believes that it is necessary to represent and engage with authorities on matters concerning the various sectors in which it operates. CFHL's engagement with the relevant authorities is guided by the values of commitment, integrity, transparency and the need to balance interests of diverse stakeholders.

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

1. Achieve total compliance with all applicable regulations pertaining to advocacy activities with the Government, non-governmental organisations, industry associations, and individuals.
2. Focus on transparency, accountability, strong corporate governance standards and ethical guiding principles in all advocacy interactions.
3. Ensure adherence to anti-corruption guidelines/policy (available on CFHL's website) in all stakeholder interactions and implement record management tools
4. Implement grievance redressal mechanisms to support the investigation of any instance of non-compliance with this policy
5. Undertake appropriate disciplinary action against any proven instance of non-compliance with this policy.

This Policy applies to all employees of CFHL, members of CFHL's Board and CFHL's contractors when acting on CFHL's behalf such as agents, public affairs, communications and legal consultants, outsourced personnel, and other third-party representatives.

The policy shall be reviewed periodically for its appropriateness and updated as and when, necessary.

Annexure-16: Fair Competition Policy

Laws encouraging fair competition known as competition laws in most countries are made by the governments to restrict activities which prevent competition and create monopolies. Lack of competition results in manipulation and exploitation of markets to the detriment of the economy.

CFHL is totally committed to doing business by ethical practices for the benefit of consumers, clients, suppliers, regulatory authorities, all other stakeholders and the community at large. Adhering to fair play rules will also enable us to avoid legal liabilities and penalties.

This Policy is applicable to all staff of Can Fin Homes Limited directly and any third party acting on behalf of Can Fin Homes Limited.

As per the principles of the fair and open competition followed by us:

- Concentration will be on achieving advantages through good performances and by avoiding unethical, unlawful practices.
- No discrimination in respect of suppliers, clients or customers
- No discussion, collusion or arrangements with, competitors regarding:
 - Customers, Products, Markets, Locations, Costs, Pricing, Contracts, Bids or quotes,
 - Suppliers, Distributors which may be detrimental to the interest of the Company.
- Not undertake any activities which unfairly restrict competition, upset the free market or likely to abuse a prominent market position
- Ensure efficient market operations by providing competitive prices, product choices, and innovation.

Another company is considered a competitor if it competes with Can Fin Homes Limited in the relevant sales markets (Housing Finance), if it vies for customers, loan proposals, or if it competes with Can Fin Homes Limited for employees in the labour market.

Communications with a competitor can raise suspicions that an anticompetitive agreement has been formed that can subject Can Fin Homes Limited to an investigation or litigation.

Additionally, in some jurisdictions, the exchange of competitively sensitive information is also considered to be a violation of competition laws.

CFHL will not share confidential business information unrelated to an agreement, and will not restrict or limit competition on other bids.

In all instances where there might be a necessity to discuss or, potentially agree upon matters with a competitor, the employees of Can Fin Homes Limited should seek professional advice from either the inhouse legal department, or if required, outside legal counsel or from the Legal & Regulatory Affairs Department.

The Policy shall be reviewed periodically and modified as and when found necessary.

6. ESG Disclosures & Reports

The Managing Director & CEO and Dy Managing Director and during his absence the Whole Time Director of the Company are the key persons for implementation of ESG initiatives.

The reporting format prescribed by SEBI named 'Business Responsibility and Sustainability Report' (BRSR), aims to establish links between the financial results of a business with its ESG performance. This can make it easier for regulators and investors and allied stakeholders to obtain a fair estimate of overall business stability, growth and sustainability. As per existing regulatory framework the Company shall prepare w.e.f. 2022-23, the Business Responsibility & Sustainability Report on annual basis which should form part of the Annual Report of the Company and shall be displayed on the website of the Company.

The Company will drive towards the implementation of policy through widespread awareness and concrete actions, while being open to continual improvement. We believe that the policy serves as a strong foundation for seamless integration of our marketplace, workplace, environment, and community concerns with Company's business operations in order to support the larger goal of sustainable development.

The Company shall communicate this policy to all stakeholders and ensure it is available to the public to ensure effective implementation of the same.

The Company shall review the ESG Policy and allied management systems annually to ensure their continuing applicability and relevance to our operations and evolving stakeholder expectations. Mid-term review can be made as and when required.
