

## PREVENTION OF SEXUAL HARASSMENT POLICY

In addition to the policies described above, RealPage complies with the requirements of the **Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act**. This Prevention of Sexual Harassment Policy ("POSH Policy") is aimed to provide guidelines to prevent and/ or redress sexual harassment which may arise at or relate to the workplace by, among other things, creating the RealPage Internal Complaints Committee (RICC). Given the sensitivity of this issue, we want to create awareness of the professional behavior expected from each of us in the workplace and promote mutual respect among our co-workers. RealPage expects its teammates and Contractors to maintain a high code of conduct and promote an environment where every person feels respected and leads a life of dignity. An important area of professional conduct pertains to fair treatment of all teammates at the workplace. The intent of the POSH Policy is to promote a healthier workplace free from sexual harassment. RealPage recognizes the right of every individual to work in a professional atmosphere that provides equal opportunities to all and prohibits discriminatory practices that may distress or inhibit a teammate. At RealPage, sexual harassment, whether verbal, physical, or environmental, on a single or repeated basis will neither be tolerated nor be condoned behavior that will likely to undermine the dignity or self-esteem of an individual, or create an intimidating, hostile or offensive environment.

### DEFINITIONS:

- (i) **"Chairperson"** shall be a female member of **RealPage Internal Complaints Committee (RICC)** acting as the first point of contact for the Complainant to assist him/her in accordance with the provisions of this POSH Policy and lead RICC.
- (ii) **"Complainant"** shall be any teammate or Contractor of RealPage who complains of any Unwelcome Sexual Conduct affecting himself/herself or any other co-worker of RealPage.
- (iii) **"Contractor"** means personnel working for RealPage but not on RealPage's payroll, contract teammates, external consultants working for RealPage, and personnel of the vendor or supplier working in the RealPage premises.
- (iv) **"RealPage"** means RealPage India Private Limited.
- (v) **"RealPage Compliance Officer"** shall be a member of the Legal Department of RealPage and RICC to oversee the implementation of POSH Policy.
- (vi) **"Sexual Harassment"** means and includes unwelcome sexual advances, requests for sexual favors and all other verbal, visual or physical conduct of a sexual or otherwise offensive nature.

To elaborate, few instances as below can be cited to amount to sexual harassment in a workplace:

- Unwanted and unnecessary touching, such as rubbing or massaging someone's neck or shoulders, stroking someone's hair, or brushing against another's body.
- Sexually suggestive touching.
- Grabbing, groping, kissing, fondling.
- Sexual favors in return for employment rewards, or threats if sexual favors are not provided (Quid pro Quo).

- Whistling and catcalls.
  - Lewd, off-color, sexually oriented comments or jokes.
  - Foul or obscene language.
  - Leering, staring or stalking.
  - Suggestive or sexually explicit posters, calendars, photographs, graffiti or cartoons.
  - Unwanted or offensive letters or poems.
  - Sitting or gesturing sexually.
  - Offensive E-mail or voice-mail messages.
  - Sexually oriented or explicit remarks, including written or oral references to sexual conduct, gossip regarding one's sex life, body, sexual activities, deficiencies or prowess.
  - Questions about one's sex life or experiences.
  - Repeated requests for dates or marriage.
  - Sexual assault or rape.
  - Unwanted physical or emotional attention.
  - Any other conduct or behavior deemed inappropriate by RealPage.
- (vii) **"Special Educator"** means a person trained in communication with people with special needs in a way that addresses their individual differences and needs.
- (viii) **"Teammates"** mean personnel on the payroll of RealPage.
- (ix) **"Unwelcome Sexual Conduct"** means and includes any unwelcome sexual advances, unwelcome textual, graphic representations of a sexual nature:
- (a) to a person;
  - (b) in a person's presence, whether the representation concerns that person or not;
  - (c) about a person (when malicious).
- (x) **"Victimization"** shall mean any adverse action by an individual, group of individuals or organizations against individuals because they have, in good faith, reported instances of sexual harassment or participated in or have been witness to proceedings to redress an alleged instance of sexual harassment.

**NOTE:**

- (i) It is Sexual Harassment for instance when a person has reasonable grounds to believe that his/her objection would disadvantage him/her in connection with his/her employment or work including recruitment or promotion or when it creates a hostile work environment or a feeling that adverse consequences may arise if the victim does not consent to the conduct in question or raises any objection thereto.
- (ii) A person shall be guilty of Sexual Harassment under this POSH Policy when (a) she/he indulges in conduct known to him/her to be Unwelcome Sexual Conduct or should reasonably have been known to such person to be Unwelcome Sexual Conduct; or (ii) she/he indulges in conduct that may reasonably be perceived by the victim as Unwelcome Sexual Conduct.

**ROLE, POWER AND DUTIES OF THE RICC**

- (i) The Chairperson / RealPage Compliance Officer is the first contact for an aggrieved person and shall advise the Complainant of the mechanisms available for resolution of a Sexual

Harassment matter in accordance with the mechanism available under this Policy.

- (ii) The Chairperson / RealPage Compliance Officer shall ensure implementation of this Policy and regularly review the functioning and effectiveness of this Policy.
- (iii) The Chairperson / RealPage Compliance Officer shall exercise such other powers and perform such other duties as may be conferred or imposed on her/him by or under this Policy.
- (iv) The Chairperson / RealPage Compliance Officer shall prepare an annual report of all activities undertaken in each calendar year and submit the same to the concerned statutory authority.
- (v) The Chairperson/ RealPage Compliance Officer shall circulate RealPage's Prevention Of Sexual Harassment Policy to ensure that all teammates and Contractors of RealPage have access to this Policy.
- (vi) The Chairperson/ RealPage Compliance Officer shall be required to prepare an annual report on the status of the Committee and any cases of sexual harassment reported in the year and shall submit the report to Board of Directors of RealPage.

**SCOPE:**

- (i) This POSH Policy covers all teammates and Contractors of RealPage and shall apply to all instances of Sexual Harassment which:
  - (a) arise or relate to the workplace including but not limited to Sexual Harassment that occurs on RealPage premises;
  - (b) occur between or among teammates and Contractors of RealPage;
  - (c) Arise due to a complaint by a third party against a RealPage teammate or Contractor and where such third party and RealPage teammate or Contractor are or was involved in an activity pertaining to RealPage.
- (ii) RealPage will not tolerate and shall not condone Sexual Harassment, whether engaged in by fellow teammates, supervisors, managers, or by outsiders who conduct business with RealPage. RealPage encourages reporting of all incidents of Sexual Harassment by their teammates, regardless of who the offender may be.
- (iii) If necessary, RealPage may initiate appropriate action in accordance with law by making a complaint with an appropriate authority where such conduct amounts to a specific offence under the Indian Penal Code or under any other law.
- (iv) While RealPage encourages individuals, who believe they are being harassed to firmly and promptly notify the offender that his behavior is unwelcome, RealPage recognizes that disparity of power and status between the harasser and a target may at times make such a warning difficult, if not impossible. In the event such direct communication between individuals is either ineffective or extremely difficult, the individual so harassed may contact the Chairperson or any of the Committee members at the numbers provided at the end of this Policy.
- (v) RealPage will ensure that such individuals who complain of Sexual Harassment either to the harasser directly or to his/her supervisor or to the Head of the Department (**HOD**), will not in any way be retaliated against either by the harasser himself or through any other supervisor, officer, or teammate. Such retaliation will be viewed as a very serious violation

of this Policy. Such retaliation, if any, should also be reported immediately to the Chairperson or any of the Committee members, for immediate corrective steps.

- (vi) Complaints received in the form of letters (anonymous or otherwise) that are very general in nature (lack seriousness) would not be entertained within the purview of this Policy. Complainants who misuse the process under this Policy for personal reasons or personal gain/rivalry may be subject to appropriate disciplinary action by RealPage including without limitation dismissal from the service.
- (vii) Sexual Harassment shall be treated as a gross / major misconduct that is discreditable, dishonorable and detrimental to the reputation of RealPage, and may lead to very severe deterrent action including without limitation dismissal from service.

### REALPAGE INTERNAL COMPLAINTS COMMITTEE

By this POSH Policy, RealPage has established RICC to deal with issues of sexual harassment at workplace. The RICC may co-opt such members of senior management of RealPage India and such other independent third-party experts as it deems necessary from time to time to assist in investigation of the complaints.

RICC shall always consist of a majority of female teammates and at this point shall consist of the following:

Name	E-mail Id	Office Number
Murali Silamkoti (Compliance Officer)	<a href="mailto:Murali.Silamkoti@RealPage.com">Murali.Silamkoti@RealPage.com</a>	040-67046000, 7032653425
Shirisha Challa (Chairperson)	<a href="mailto:Shirisha.Challa@RealPage.com">Shirisha.Challa@RealPage.com</a>	040-67046000, 9100190167
Chandrakala Kawle (Member)	<a href="mailto:Chandrakala.Kawle@RealPage.com">Chandrakala.Kawle@RealPage.com</a>	040-67046000,
Aliveni Pantula (Member)	<a href="mailto:Aliveni.Pantula@realpage.com">Aliveni.Pantula@realpage.com</a>	040-67046000, 6300440147
Farah Naaz (Member)	<a href="mailto:Farah.Naaz@realpage.com">Farah.Naaz@realpage.com</a>	040-67046000 7032429521
Bhaskar Jaddu (Member)	<a href="mailto:Bhaskar.Jaddu@RealPage.com">Bhaskar.Jaddu@RealPage.com</a>	040-67046000, 8885544429
Aruna Kumari (Independent External Expert Member)	<a href="mailto:Aruna@hyderabad.kochhar.com">Aruna@hyderabad.kochhar.com</a>	80085 02717
Deeksha (Independent External Expert Member)	<a href="mailto:Deeksha@hyderabad.kochhar.com">Deeksha@hyderabad.kochhar.com</a>	9573082502

The Committee may co-opt such members of senior management of RealPage or such other independent third-party experts as it deems necessary from time to time to assist in investigation of the complaints.

**PROCESS AND PROCEDURE FOR FILING A COMPLAINT UNDER THE POSH POLICY:**

RealPage India strongly encourages the prompt reporting of all incidents of discrimination and Sexual Harassment to the Chairperson, within a period of 3 (three) months from the date of such incident and in case of a series of incidents, within a period of 3 (three) months from the date of last incident. At the time of filing the complaint, the Complainant shall submit 6 (six) copies of the complaint, along with the supporting documents and the names and addresses of the witnesses. In the event the Complainant is unable to make a complaint within 3 (three) months of the incident, then the Committee may extend the time for making such complaint if it is satisfied with the circumstances that prevented the Complainant from making the complaint within such period. In the event that the Complainant is unable to make a complaint in writing, the Chairperson or a member of the Committee may render such assistance, as may be required, for the Complainant to make such complaint in writing. Where the Complainant is unable to make a complaint on account of physical incapacity, his/ her relative or friend, a co-worker, an officer of the National or State Commission for Women, any person who has knowledge of the incident (with written consent of the Complainant) may make a complaint under this POSH Policy. Where the Complainant is unable to make a complaint on account of mental incapacity, his/ her relative or friend, a special educator, a qualified psychiatrist or psychologist, the guardian or authority under whose care he/ she is receiving treatment, and any person who has knowledge of the incident may make a complaint under this POSH Policy. Further, where the aggrieved individual is, for any other reason, unable to make a complaint, a complaint may be filed on his/ her behalf by a person who has knowledge of the incident, with a written consent from the Complainant. In the event the Complainant is dead, a complaint may be filed on his/ her behalf by a person who has knowledge of the incident, with a written consent from the legal heir of the Complainant.

If you believe that you have been subjected to any harassment, RealPage India requires you to promptly notify the Chairperson. Any supervisor who receives a report of discrimination or Sexual Harassment must immediately notify the Chairperson at the address mentioned above. Any question about this POSH Policy or potential Sexual Harassment should be brought to the attention of the Chairperson/member of RICC/ 040-6704 6000 Ext 6046.

Additionally, Teammates may also contact the confidential Alert Line at:

<p><b><u><a href="#">RealPage Ethics Point</a></u></b></p> <p><b><u><a href="https://realpage.alertline.com">https://realpage.alertline.com</a></u></b></p> <p><b>Or call: US and Canada: 877-874-8416</b></p> <p><b>India: 000-117 then 844-330-0225</b></p> <p><b>Philippines: 105-11 then 844-330-0225</b></p> <p><b>Spain: 900-99-0011 then 844-330-0225</b></p> <p><b>United Kingdom: 0-800-89-0011 then 844-330-0225</b></p>
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**RESOLVING THE MATTER:**

- (i) If an employee is uncomfortable with a co-worker's behavior but does not feel that the matter has progressed to Sexual Harassment, the employee may, at their discretion, talk to the offending individual at a personal level and share her/ his apprehensions if he/she feels comfortable doing so. However, RealPage recognizes that disparity of power and status

between the alleged accused and a target may at times make such a discussion difficult, if not impossible. In the event an employee does not feel comfortable with such direct communication, he/she should contact the Chairperson or the above-mentioned confidential Alert Lines.

- (ii) If the employee believes that he/she has been the victim of Sexual Harassment and the Sexual Harassment appears to persist, the Complainant may bring the matter before the Chairperson or any of the Committee members. The Chairperson may confidentially talk to the offending person to stop such conduct forthright.
- (iii) If the offending behavior continues or if the employee considers the sexual harassment serious enough, the employee can submit request for enquiry either in writing or orally to any of the members of the Committee.
- (iv) During the pendency of the inquiry, on a written request made by the Complainant or the aggrieved person, the Committee may recommend a transfer of the Complainant or the alleged accused to any other department or office of RealPage.
- (v) The Committee shall conduct the inquiry in accordance with the principles of natural justice.
- (vi) The Committee will treat the matter, discussions and communications in respect of any complaints with utmost confidentiality at all times. The Complainant and alleged accused or any person who becomes aware of the matter during the course of the grievance handling process shall also maintain such matter, discussions and communications in strict confidence. Where any person entrusted with the duty to handle the complaint and inquiry in confidence breaches such duty, such will be punishable with a penalty of Rs. 5,000/- (Rupees Five Thousand only).
- (vii) The Committee is the authority for fact finding and assessment of the incidents and is required to submit a report of the same to the management of RealPage. The Committee may seek the Human Resources Department's help for fact-finding and assessment of the case, wherever required.
- (viii) The hearing of the complaint shall be a discussion solely between the Complainant and the members of the Committee. Neither the Complainant nor the alleged accused shall be allowed to bring a legal practitioner to represent them at any stage of the inquiry. The Complainant and the alleged accused will have the right to present their cases in writing or verbally, and the Committee may use recording or written record in order to prevent any misreporting or misunderstanding. The Committee shall seek the confirmation of the Complainant and the alleged accused on the contents of their submissions. The Committee shall also have similar powers as vested with a civil court to (a) summon the attendance of any person and examine him/ her under oath; and (b) require the discovery and production of documents; and (c) use such other legal methods to successfully complete the enquiry.
- (ix) At least 3 (three) of the Committee members are required to be present for drawing the fact-finding report, if necessary and the assessment for issue of sanction against the alleged accused.
- (x) The Committee shall have the right to terminate the inquiry or pass an ex-parte decision on the complaint, in the event the Complainant or the alleged accused fails, without reasonable cause, to present themselves for 3 (three) consecutive hearings. However, an ex-parte order will not be passed by the Committee without giving a written notice of 15 (fifteen) days to the relevant party.

- (xi) Using the procedure will not prejudice any aspect of the Complainant's future employment with RealPage in any way whatsoever. The records of written evidence of the complaint will not be filed in the Complainant's personal file.

Upon completion of the investigation, corrective action will be taken, if appropriate and supported by the facts. Corrective action may include, but is not limited to, oral or written reprimand, referral to formal counseling, disciplinary suspension or probation, or discharge from the Company. If necessary, the Company may initiate appropriate action in accordance with law by making a complaint with an appropriate authority where such conduct amounts to a specific offence under the Indian Penal Code or under any other applicable law.

#### **SANCTIONS:**

The following sanctions may be imposed by the RICC on the person found guilty of causing Sexual Harassment.

#### **KINDS OF SANCTION AVAILABLE AGAINST REALPAGE TEAMMATES AND CONTRACTORS:**

	<b>Kinds of Sanction</b>	<b>Reprimand</b>	<b>Department responsible for issuing sanction letter</b>	<b>Method of Informing</b>	<b>Authority</b>
1.0	Warning	<b>RICC</b>	HR	Warning Letter	<b>RICC</b>
1.1	Warning + Wage Cut/ Removal of Benefits	<b>RICC</b>	HR	Sanction Letter	<b>RICC</b>
1.2	Warning + Suspension/ Disqualification from Rewards /Demotion	<b>RICC</b>	HR	Sanction Letter	<b>RICC</b>
2.	Termination / Dismissal	<b>RICC</b>	HR	Termination letter	<b>RICC</b>
3.	Filing complaint with the Appropriate Authority, if necessary, under Indian Penal Code	<b>Legal</b>	Legal	Filing a private complaint / FIR	<b>Legal</b>