Policy for Prevention of Sexual Harassment at the Workplace

Hiranandani Financial Services Private Limited

Version Control

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POLICY FOR PREVENTION OF SEXUAL HARASSMENT AT THE WORKPLACE

1. Preamble

In view of adhering to the prescribed laws under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Rules, 2013, our Company has framed this policy for prevention of sexual harassment at the Company ("**the policy**").

2. Commitment

The Company is committed to provide a work environment that ensures every woman employee is treated with dignity and respect, and afford equitable treatment to all employees.

The Company is also committed to promote a work environment that is conducive to the professional growth of its women employees, and encourage equality of opportunity. The Company will not tolerate any form of sexual harassment and is committed to take all necessary steps to ensure that its women employees are not subjected to any form of harassment.

3. Scope

This policy applies to all categories of employees of the Company, including permanent managerial or subordinate whether probationers, casuals, temporaries, trainees and employees on contract working for and on behalf of the Company either at its workplace or deputed to work elsewhere including at client sites.

The Company will not tolerate sexual harassment, even if engaged in by clients, customers, vendors or by suppliers or any other business associates.

The workplace includes:

i. All offices or other premises where the Company's business is conducted.
ii. All company-related activities performed at any other site away from the Company's premises.
iii. Any social, business or other functions where the conduct or comments may have an adverse impact on the workplace or workplace relations.

4. Definition of Sexual Harassment

Sexual harassment includes any one or more of the following unwelcome acts or behaviour (whether directly or by implication) namely,

i. Physical contact and advances; or
ii. A demand or request for sexual favours; or
iii. Making sexually coloured remarks; or

iv. Showing pornography; or
v. Any other unwelcome physical, verbal or nonverbal conduct of sexual nature;

Further, the following circumstances, if they occur or are present in relation to or connected with any act or behaviour of sexual harassment, may amount to sexual harassment: -

i. Implied or explicit promise of preferential treatment in her employment; or
ii. Implied or explicit threat of detrimental treatment in her employment; or
iii. Implied or explicit threat about her present or future employment status; or
iv. Interference with her work or creating an intimidating or offensive or hostile work environment; or
v. humiliating treatment likely to affect her health or safety.

5. Complaints Committee

The Company has constituted an "**Internal Complaints Committee**" for Redressal of sexual harassment complaints (made by a Complainant) and for ensuring time bound treatment of such complaints.

The Internal Complaints Committee is responsible for:

i. Inquiry about every formal written complaint of sexual harassment and submission of the report of its findings to the employer.
ii. Taking appropriate remedial measures to respond to any substantiated allegations of Sexual harassment.
iii. Discouraging and preventing employment related sexual harassment.
iv. Recommend to the employer to take action against the complainant for false or malicious complaint and false evidence.

6. RESPONSIBILITIES REGARDING SEXUAL HARASSMENT

Employer's Duties

i. To provide a safe working environment at workplace this includes safety from the persons coming into contact at the workplace.

ii. Treat sexual harassment as Misconduct under the service rules and initiate action for such misconduct.

iii. Display at any conspicuous place in the workplace the penal consequence of the sexual harassment and the order constituting the Internal Complaints Committee as per the Act.

iv. Organize workshops and awareness programmes at regular intervals for sensitizing the employees with the provisions of the Act.

v. Orientation programmes for the members of the Internal Complaints Committee.

vi. Provide necessary facilities to Internal Committee for dealing with complaints and conduct an inquiry.

vii. To monitor the timely submission of reports by the Internal Committee.

viii. To include in the annual report the number of cases filed, if any, and their disposable under this Act.

Employees' Duties/Obligations

i. All employees of the Company have a personal responsibility to ensure that their behaviour is not contrary to this policy.

ii. All employees are encouraged to reinforce the maintenance of a work environment free from sexual harassment.

7. Complaint Mechanism

Whether or not such conduct constitutes an offence under law or a breach of the service rules, an appropriate complaint mechanism in the form of "Complaints Committee" has been created in the Company for time-bound redressal of the complaint made by the complainant.

8. Manner of Making Complaints to the Committee

i. An aggrieved woman shall make complaint in writing to the Internal Complaints Committee within 3 months from the date of incident and in case of series of incidents from the date of last incident.

ii. If such complaint cannot be made in writing then the Internal Complaints Committee shall render all reasonable assistance to the aggrieved woman for making the complaint in writing.

iii. Where the aggrieved woman is unable to make complaint on account of her mental and physical incapability then the legal heir, relative, friend and her co-worker, or any other person as mentioned in the aforesaid Act and who has the knowledge of the incident, can make the complaint to the Internal Complaints Committee along with the written approval of the aggrieved person.

9. Procedures for Resolution, Settlement or Prosecution of Acts of Sexual Harassment

The Company is committed to providing a supportive environment in which to resolve concerns of sexual harassment as under:

A. Informal Resolution Options:

i. When an incident of sexual harassment occurs, the woman aggrieved of such conduct can communicate her disapproval and objections immediately to the harasser and request the harasser to behave decently.

ii. If the harassment does not stop or if aggrieved woman is not comfortable with addressing the harasser directly, she can bring her concern to the attention of the Complaints Committee for redressal of her grievances. The Complaints Committee will thereafter provide advice or extend support as requested and will undertake prompt investigation to resolve the matter.

B. Complaints:

i. Any aggrieved woman with a harassment concern, who is not comfortable with the informal resolution options or has exhausted such options, may make a formal complaint containing the specific relevant details to the Presiding Officer of the Internal Complaints Committee constituted by the Management against the person/s accused of having engaged in such harassment. The complaint shall have to be in writing and can be in form of a letter, preferably within 15 days from the date of occurrence of the alleged incident. The employee is required to disclose her name, department, division and location she is working in, to enable the Presiding Officer to contact her and take the matter forward. The Complainant shall submit six copies of the complaint along with the supporting documents and the names and addresses of the witnesses to the Internal Complaints Committee.

ii. The Presiding Officer of the Complaints Committee will proceed to determine whether the allegations (assuming them to be true only for the purpose of this determination) made in the complaint fall under the purview of Sexual Harassment, preferably within 14 days from receipt of the complaint. In the event, the allegation does not fall under the purview of Sexual Harassment or the allegation does not mean an offence of Sexual Harassment, finding be recorded with reasons and communicate the same to the complainant.

iii. If the Presiding Officer of the Complaints Committee determines that the allegations constitute an act of sexual harassment, the allegation shall be investigated with the assistance of the Complaints Committee.

iv. Where such conduct on the part of the accused amounts to a specific offence under the law, the Company shall initiate appropriate action in accordance with law by making a complaint with the appropriate authority.

v. The Internal Complaints Committee shall send one copy of the Complaint to the Respondent within seven days.

vi. The respondent shall file his reply along with the documents and names and addresses of witnesses within a period not exceeding ten working days from the date of receipt of the documents.

vii. The Internal Complaints committee shall make inquiry into the complaint in accordance with the principles of natural justice.

viii. The Internal Complaints Committee shall have the right to terminate the inquiry proceedings or to give an ex-parte decision on the complaint, if the complainant or respondent fails, without sufficient cause to present her or himself for three consecutive hearings convened by the Presiding Officer. The termination or ex-parte order may be passed after giving a notice in writing within 15 days in advance to the party concerned.

ix. The parties shall not be allowed to bring in any legal practitioner to represent them in their case at any stage of the proceedings before the Internal Complaints Committee.

x. While conducting the inquiry minimum three members of the Complaints Committee including the Presiding Officer shall be present.

xi. The Complaints Committee shall conduct such investigations in a timely manner and shall submit a written report containing the findings and recommendations to the Disciplinary Authority as soon as practically possible and in any case, not later than 60 days from the date of receipt of the complaint. The concerned disciplinary authority will ensure corrective action on the recommendations of the Complaints Committee and keep the complainant informed of the same.

10. Corrective action may include any of the following:

a. Formal apology
b. Counseling
c. Written warning to the perpetrator / accused with a copy maintained in the employee's file.
d. Change of work assignment / transfer for the perpetrator / accused or the aggrieved woman. In case it is proposed to transfer the aggrieved woman such a transfer shall not be without her consent.
e. Suspension or termination of services of the employee found guilty of the offence.
f. In case the complaint is found to be false, the Complainant shall, if deemed fit, be liable for appropriate disciplinary action by the Management.

11. Confidentiality

The Company understands that it may be difficult for a complainant to come forward with a complaint of sexual harassment and recognizes the complainant's interest in keeping the matter confidential.

To protect the interest of the complainant, the accused person and others who may report the incidents of sexual harassment, confidentiality will be maintained throughout any investigatory process to the extent practicable and appropriate under the circumstances.

12. Access to report and documents

All records of complaints, including contents of meeting, results of investigations and other relevant material will be kept confidential by the Company except where disclosure will be subjected to disciplinary or other remedial process.

13. Protection to complainant

The Company is committed to ensuring that no employee who brings forward a harassment concern is subject to any form of reprisal. Any reprisal will be subject to disciplinary action.

The Company will ensure that complainant or witnesses are not victimized or discriminated against while dealing with complaints of sexual harassment.

However, anyone who abuses the procedure (eg. by maliciously putting an allegation knowing it to be untrue) will subject to disciplinary action.

14. Conclusion

In conclusion the Company reiterates its commitment to providing its women employees a work place free from harassment /discrimination and where every employee is treated with dignity and respect.

HFS - Internal Complaints Committee (ICC)

(Constituted under Policy for Prevention of Sexual Harassment at the Workplace)

Any female employee who wishes to file a complaint related to sexual harassment may do so by sending an email to posh@hfs.in or writing to the Presiding Officer of the applicable ICC to niyati.surlakar@hfs.in.

Region	Role	Name of the personnel	Designation
West & North	Presiding Officer	Niyati Amol Surlakar	Deputy Vice President - Secretarial & Legal
	Member	Dheeraj Mittal	Chief Operating Officer
	Member	Sudhakar V	Head - HR Business Partnering
	Consultant	Deepa Bhalerao	External Member
South	Presiding Officer	Niyati Amol Surlakar	Deputy Vice President - Secretarial & Legal
	Member	Balan Santosh Parthasarathy	Company Secretary & Compliance Officer
	Member	Sudhakar V	Head - HR Business Partnering
	Consultant	Deepa Bhalerao	External Member

Introduction of State Level Internal Complaints Committee (SLICC)

(Constituted under Policy for Prevention of Sexual Harassment at the Workplace)

Along with the existing regional committee, the state level committee stands revised as detailed below.

Region	Role	Name of the personnel	Designation
Gujarat	Presiding Officer	Niyati Amol Surlakar	Deputy Vice President - Secretarial & Legal
	Member	Dheeraj Mittal	Chief Operating Officer
	Member	Sudhakar V	Head - HR Business Partnering
	Consultant	Deepa Bhalerao	External Member
Madhya Pradesh	Presiding Officer	Niyati Amol Surlakar	Deputy Vice President - Secretarial & Legal
	Member	Dheeraj Mittal	Chief Operating Officer
	Member	Sudhakar V	Head - HR Business Partnering
	Consultant	Deepa Bhalerao	External Member
Maharashtra	Presiding Officer	Niyati Amol Surlakar	Deputy Vice President - Secretarial & Legal
	Member	Dheeraj Mittal	Chief Operating Officer
	Member	Sudhakar V	Head - HR Business Partnering
	Consultant	Deepa Bhalerao	External Member
Telangana	Presiding Officer	Niyati Amol Surlakar	Deputy Vice President - Secretarial & Legal
	Member	Balan Santosh Parthasarathy	Company Secretary & Compliance Officer
	Member	Sudhakar V	Head - HR Business Partnering
	Consultant	Deepa Bhalerao	External Member
Karnataka	Presiding Officer	Niyati Amol Surlakar	Deputy Vice President - Secretarial & Legal
	Member	Balan Santosh Parthasarathy	Company Secretary & Compliance Officer
	Member	Sudhakar V	Head - HR Business Partnering
	Consultant	Deepa Bhalerao	External Member

Region	Role	Name of the personnel	Designation
Tamil Nadu & Puducherry	Presiding Officer	Niyati Amol Surlakar	Deputy Vice President - Secretarial & Legal
	Member	Balan Santosh Parthasarathy	Company Secretary & Compliance Officer
	Member	Sudhakar V	Head - HR Business Partnering
	Consultant	Deepa Bhalerao	External Member
Andhra Pradesh	Presiding Officer	Niyati Amol Surlakar	Deputy Vice President - Secretarial & Legal
	Member	Balan Santosh Parthasarathy	Company Secretary & Compliance Officer
	Member	Sudhakar V	Head - HR Business Partnering
	Consultant	Deepa Bhalerao	External Member
Uttar Pradesh	Presiding Officer	Niyati Amol Surlakar	Deputy Vice President - Secretarial & Legal
	Member	Dheeraj Mittal	Chief Operating Officer
	Member	Sudhakar V	Head - HR Business Partnering
	Consultant	Deepa Bhalerao	External Member
Rajasthan	Presiding Officer	Niyati Amol Surlakar	Deputy Vice President - Secretarial & Legal
	Member	Dheeraj Mittal	Chief Operating Officer
	Member	Sudhakar V	Head - HR Business Partnering
	Consultant	Deepa Bhalerao	External Member

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