

AVANSE FINANCIAL SERVICES LIMITED

Policy on Prevention of Sexual Harassment at Workplace

* This Policy has been prepared based on “The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013” and rules as applicable. For any further clarification please refer to the act and the rules.

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1. INTRODUCTION

Avanse Financial Services Ltd. (hereinafter referred as “Avanse” or the “Company”) is committed to providing a safe and respectful work environment to its employees that enables employees to work without fear of prejudice, harassment or any form of intimidation or exploitation. The Company believes that all employees have the right to be treated with dignity.

Avanse does not support discrimination of individuals on the basis of race, color, gender, age, national origin, religion, sexual orientation, marital status, citizenship and disability.

Sexual Harassment at Workplace is Strictly Prohibited. Sexual Harassment to woman results in violation of her fundamental rights including right to equality, right to life and to live with dignity, right to practice any profession or to carry on any occupation, trade or business in a safe working environment which is free from Sexual Harassment. These rights are guaranteed under the Constitution of India and sexual harassment is itself a criminal offence under Indian Penal Code.

Avanse treats Sexual Harassment as gross misconduct under the service rules and other applicable laws and action will be initiated appropriately for such misconduct. This Policy is framed based on the aforesaid principles and to meet the requirements stipulated by “The Sexual Harassment of Woman at Workplace (Prevention, Prohibition and Redressal) Act, 2013” and rules made there under.

2. PURPOSE OF THE POLICY

No employee shall be subjected to sexual harassment at Avanse. This Policy shall provide Protection and Prevention against Sexual Harassment at Workplace and for Redressal of complaints of Sexual Harassment and matters connected therewith.

3. APPLICABILITY

This Policy applies to all the employees who are on the rolls of the company; it applies to probationers, permanent employees and to trainees (whether in the office premises or outside while on assignment).

This Policy shall be applicable at all the offices of the Company including but not limited to any place visited by the employee arising out of or during the course of the employment including transportation provided by the Company for undertaking such journey.

This policy will also apply to women who are covered by definition in “Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013”, as amended from time to time.

Where Sexual Harassment occurs to a women employee as a result of an act by a third party or outsider while on official duty, the Company will take all necessary and reasonable steps to assist her in terms of support and preventive action.

This policy will come into force with immediate effect.

4. DEFINITIONS

1. **Aggrieved woman** means a woman of any age whether employed or not, who alleges to have been subjected to any act of Sexual Harassment by the respondent.
2. **Complainant** means aggrieved woman as defined above.
3. **Employee** means a person employed at a workplace for any work on regular, temporary 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.
4. **Employer** means and includes Chief People Officer of Avanse.
5. **Internal Committee** ("IC") means the Committee constituted (refer **Annexure A**) as per the provisions of "The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013", for addressing complaints against sexual harassment. Presiding Officer and the External Member shall be permanent members of any zonal IC, constituted by the Employer from time to time in accordance with the legal requirements. Members of the IC shall hold office for a period of three years from the date of implementation of this policy. Presiding Officer shall be a senior level woman employee and at least 50% shall be woman members in an IC meeting. However, in case of employee attrition, transfer, unwillingness of any member of the IC (including the External member) to continue his/her membership in IC or as deem fit by the Chief People Officer of Avanse who shall have the right to re-constitute the IC (including any zonal IC) by way of the written order, and such written order(s) shall form part of this Policy.
6. **Incident:** means an incident of Sexual Harassment against which a Complainant is lodged under this Policy, or as may be reported to the Internal Committee as per **Annexure B** to this Policy.
7. **Respondent** means a person against whom the complaint has been made.
8. **Sexual Harassment** 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 colored remarks; or
 - (d) Showing pornography; or
 - (e) Any other unwelcome physical, verbal or non-verbal conduct of sexual nature.
9. **Workplace** includes all offices and branches of the Company, all instances reported within the Company and any place visited by the employee arising out of or during the course of employment including transportation provided by the employer for undertaking such journey.

5. TYPES OF SEXUAL HARASSMENT:

- (a) Under the **quid pro quo** (meaning "this for that") form of harassment, a person or authority, usually the superior of the victim or someone who has direct control over the working conditions of the victim demands sexual favors and promises to give job benefit (like good increment, promotion etc.) and/or threatens to not extend benefits to the employee if sexual favor/s is/are not

met. In other words, including but not limited to, following will amount to 'quid pro quo' sexual harassment:

- (i) implied or explicit promise of preferential treatment in her/his employment, or
- (ii) implied or explicit threat of detrimental treatment in her/his employment, or
- (iii) implied or explicit threat about her/his present or future employment status.

(b) A **hostile work environment** arises when a work environment unsafe through:

- (i) Verbal – includes sexual words and other sexual suggestive comments.
- (ii) Non-Verbal – includes showing gestures or written offensive material and making offensive sounds.
- (iii) Physical conduct - includes intentional touching of the body and inappropriate display of the body.

Which interferes with another woman's job performance or creates the workplace atmosphere, which is interference with a person's work or creating an intimidating or offensive or hostile work environment for a person, or humiliating treatment likely to affect her/his health or safety will amount to sexual harassment.

6. COMPLAINTS PROCESS

If you have been subjected to Sexual Harassment by anyone including visitors or other non- employees during your official duties and/or at workplace, you should:

1. Tell the offender that his/her behavior is unwelcome and ask him/her to stop immediately. However at this stage, if you wish to make a complaint you may choose to do so.
2. Keep a record of incidents (dates, times, locations, possible witness, what happened, your response). It is helpful and necessary to have a record of events, since such a record can strengthen your case and help you remember the details over time.
3. If after telling the offender to stop the behavior, the Sexual Harassment continues, report the abuse to the Internal Committee Member in writing (as per the format prescribed – **Annexure B**). However you may give your complaint to your Reporting Manager/ HR. If the respondent is your reporting manager then it is necessary for the person to give the complaint to the Internal Committee Member. The complainant could also write an email and send it at Internal.committee@avanse.com for submitting sexual harassment complaint with all details clearly mentioning name, other identity and contact details. Anonymous complaints will not be investigated.
4. Complaints received by Reporting Manager should be forwarded to Internal Committee at internal.committee@avanse.com immediately (same business day as received). It is also necessary for the reporting manager to speak to HR about the complaint.
5. Such a complaint should be made in writing and within a period of three months from the date of incident and in case of a series of incidents, within a period of three months from the date of last incident. While submitting your written complaint it is necessary to submit 6 copies of the complaint along with supporting evidences and the names and addresses of the witness.
6. Once the Complainant makes a complaint it is necessary to keep the information about the complaint "Strictly Confidential".

7. If an aggrieved woman is unable to make a complaint in writing due to her physical and/or mental incapacity, a complaint may be filed by:
 - a. Her relative or friend; or
 - b. Her co-worker; or
 - c. A qualified psychiatrist or psychologist; or
 - d. An officer of the National Commission for Women or State Women's Commission; or
 - e. Any person who has knowledge of the incident to file a complaint but after having a written consent of the complainant.

7. INTERNAL COMMITTEE

For the purpose of handling and addressing any of the complaints under Sexual Harassment an Internal Committee has been formed. Details of the names of the Committee are provided in "Annexure A" of the Policy.

8. COMPLAINT REDRESSAL PROCESS

Complaints received in accordance to clause 6.2 and 6.4 will be addressed as per the process laid down in this policy. Consistent with the company's obligation to conduct an investigation and take appropriate corrective action, complaint of Sexual Harassment will be treated immediately and fairly.

It is the obligation of all employees to report Sexual Harassment faced by them in writing and with all relevant records. The detailed process is outlined as follows:

1. Once the complaint is received, it will be kept strictly confidential and will be dealt with confidentially. The respondent will be informed that a complaint has been filed against him and no unfair acts of retaliation or unethical action will be tolerated.
2. The Internal Committee shall send one of the copies of complaint received from the complainant to the respondent.
3. The respondent has to file his/her reply to the complaint along with the list of documents and names and addresses of witnesses, within a further period of 10 working days from the date he/she receives the complaint copy. The reply should be filed with the Internal Committee.
4. The Internal Committee may before initiating an inquiry and at the request of the complainant take steps to settle the matter between the complainant and the respondent through conciliation, provided no monetary settlement shall be made as a basis of conciliation.

Where there is a settlement arrived, Internal Committee will record the settlement and forward the same to Chief People Officer, to take action as specified in the recommendation. Copies of the settlement will be given to the Complainant and the respondent. Internal Committee will conduct no further inquiry in this case.

5. If the Aggrieved Woman informs the Internal Committee, that any term of condition of the settlement arrived has not been complied with by the respondent, the internal Committee shall proceed to make an inquiry into the complaint including forward the complaint to the police as the case may be.

6. Both the complainant and the respondent initially will be questioned separately with a view to ascertain the authenticity of their contentions.
7. The Internal Committee will conduct a prompt and thorough investigation of the complaint. The procedure will include equal opportunities to both the parties to present their side of the case. The inquiry shall be completed within a period of 90 days. In addition, the Internal Committee shall if the Aggrieved Women so desires and if prima facie case exists, assist and forward the complaint to the police, for registering the case under section 509 of the Indian Penal Code.
8. The Internal Committee can:
 - i. Summon and enforce the attendance of any person and examine him/her on oath.
 - ii. Requiring discovery and production of any document.
 - iii. Investigate a Complaint by a committee of 4 members as below:
 - a. A presiding officer who shall be a woman employed at a senior level.
 - b. External Member
 - c. Any other 2 members provided that at least 2 out of the 4 members of the Committee shall be Women.

Wherever necessary, the Internal Committee will appoint an Investigation Officer(s) to make an in-depth inquiry of the complaint and meet the concerned people. The Investigation Officer will generally be a senior woman employee of Avanse.

9. The Internal Committee shall make inquiry into the complaint in accordance with the principles of natural justice. It shall have the right to terminate the inquiry proceedings or to give an ex-parte decision on the complaint, if the complainant or respondents fails without sufficient reason to present in 3 consecutive hearings convened for the purpose. Such a decision will be taken after giving a notice in writing, fifteen days in advance to the party concerned.
10. 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 Internal Committee.
11. During the Pendency of an Inquiry, on a written request made by the complainant to the Internal Committee or in its sole discretion, the Internal Committee may recommend to the Chief People Officer, any of the following:
 - i. Transfer the complainant or the respondent to any other workplace or department.
 - ii. Restrain the respondent from reporting on work performance of the complainant or writing her confidential report and assign the same to another manager.
 - iii. Grant leave to the aggrieved woman up to a period of three months.

The Internal Committee will make such a recommendation after considering the necessity for taking such an action; if a prima facie case of Sexual Harassment exists; and if the medical condition of the Aggrieved Woman so requires. It will also depend upon the extent of damage it can cause and looking at severity of the incidence.

12. The Internal Committee on completing the inquiry will make a detailed report within 10 days of completing the inquiry and submit it to Chief People Officer the following:
 - a. Background.
 - b. Documented testimony of the complainant and the respondent.
 - c. Evidences gathered/recorded.
 - d. Findings of the Inquiry.
 - e. Recommended action.

13. The Internal Committee, if after completing an inquiry arrives at the conclusion that the allegation against the respondent has not been proved, it shall recommend to Chief People Officer no action be taken in the matter.

14. If the Internal Committee arrives at the conclusion that the allegations against the respondent has been proved it shall recommend to the Chief People Officer:
 - a. To take action for Sexual Harassment as misconduct in accordance with the provisions of the service rules applicable to the respondent including dismissal. It can recommend to the Chief People Officer, to take any action including a written apology, warning, reprimand, withholding of promotion, withholding of pay rise or increments, terminating the respondent from service or undergoing a counseling session or carrying out community service.
 - b. To deduct from the respondent's salary or wages that may be considered appropriate to be paid to the Aggrieved Woman as prescribed under the law.

The Chief People Officer in consultation with the Chief Executive Officer can deduct from the salary of the respondent but if it is not able to do so due to absence from duty or cessation of employment it may direct to the respondent to pay such sum to the aggrieved woman. In case, the respondent fails to pay the sum, the Internal Committee can forward the order for recovery of the sum as an arrear of land revenue to the concerned District Officer.

15. Upon receipt of the report, the Chief People Officer will review the report and determine what action and follow—up needs to happen in consultation with Chief Executive Officer. Such a decision on the recommendations of the Internal committee will be taken by the Employer within 60 days of receiving the report from Internal Committee. The decision of the Employer shall be informed to the complainant and the respondent in writing.

16. Notwithstanding anything contained in the Right to Information Act 2005, the contents of the complaint made, identity, addresses of the Aggrieved Woman, respondent and witnesses, any information relating to conciliation and inquiry proceeding, recommendations of the Internal Committee shall not be published, communicated or made known to the public.

17. Enquiry under this policy will be preferably held at the location of the complaint.

18. **Reporting:** The Presiding Officer of the Internal Committee in consultation with Chief People Officer shall prepare a report in each financial year and submit the same to the Company Secretary of Avanse by April 30th of the following year for disclosure in the Annual Report of the Company, with following details:

1. Number of complaints of sexual harassment received during the year;
2. Number of complaints disposed off during the year;

3. Number of cases pending for more than ninety days;
4. Number of workshops or awareness programs against sexual harassment carried out;
5. Nature of action taken by the Employer.

9. FALSE OR MALICIOUS COMPLAINTS

This policy has been evolved as a tool to ensure that in the interest of justice and fair play, our employees have a forum to approach in the event of instances of Sexual Harassment. However, if on inquiry by the Internal Committee it is revealed and concluded that the complaint was made with a malicious intent or the complainant or any other person making the complaint has made the complaint knowing it to be false, forged or misleading document submission and with the motive of maligning the concerned individual / tarnishing her/his image in the company and to settle personal/professional scores, it will recommend to the Chief People Officer to take any action including a written apology, warning, reprimand, withholding of promotion, withholding of pay rise, terminating the Complainant or the concerned employee from service or undergoing a counseling session or carrying out community service.

During the inquiry mere inability to substantiate a complaint or provide adequate proof may not attract action against the complainant.

10. PROTECTION AGAINST RETALIATION

The organization prohibits retaliation of any sort regardless of the outcome of the complaint against a person who has reported a concern, brought a complaint, cooperated in the inquiry of a complaint, or because a person is closely associated with an individual who has raised a complaint.

The organization while dealing with complaints of Sexual Harassment shall ensure that the Complainant or the witness are not victimized or discriminated against by the respondent. The Complainant should report any unwarranted pressures, retaliatory or any other type of unethical behavior from the respondent while the investigation is in progress to the Internal Committee or to the organization as soon as possible. Management will take disciplinary action against the respondent if the complaint of retaliation made is found to be genuine.

11. MANAGEMENT RESPONSIBILITIES

1. Display the policy on the Company's intranet with names and contact details of all members of the Internal Committee.
2. Provide necessary facilities to the Internal Committee for dealing with the complaint and conducting an inquiry.
3. Assist in securing the attendance of respondent and witnesses before the Internal Committee and make available such information to the Internal Committee in context of the complaint.
4. Provide assistance to the aggrieved woman for filing a complaint and also for initiating action against the respondent in relation to the offence under the Indian Penal Code or any other law for the time being in force, if the aggrieved woman chooses the same;

5. Treat sexual harassment as misconduct under the code of conduct and initiate action for such misconduct;
6. Chief People Officer on the recommendation of the Internal Committee may seek appropriate expert advice and arrange for help and support for the Complainant or the concerned employee in the form of counseling and / or medical attention.
7. Information pertaining to the number of cases filed and their disposal, as applicable to be included in the Annual Report of the Company.
8. Company will organize workshops and awareness programmes at regular intervals for sensitizing the employees with the provisions of the 2013 Act and orientation/capacity building programmes for the members of the Internal Committee.
9. Display at any conspicuous place at the workplace' the penal consequences of sexual harassments; and the constitution of Internal Committee.

12. AMENDMENT TO THE POLICY

The Company reserves the right to amend the Policy from time to time in order to comply with any laws / rules / regulations that come into effect from time to time, related to Sexual Harassment.

ALL MATTERS WHICH ARE NOT SPECIFICALLY OUTLINED IN THIS POLICY SHALL BE GOVERNED AS PER THE APPLICABLE LAWS AND/OR DECIDED BY THE CHIEF PEOPLE OFFICER, FROM TIME TO TIME.

Annexure A

Constitution of Internal Committee ("IC")

Names of Members	
IC HO Core Committee Members	IC Role
Bhargavi Thakkar	Presiding Officer
Gaurao Deepak Patil	Member
Megha Dhanotiya	Member
Priyanka Kapoor	Member
Sonia Sule	Member
Srisha Joshi	Member
Sudhakar B.V	Member
<i>Sagina Deshmukh</i>	<i>External Member</i>
Ahmedabad & Surat Branch Members	IC Role
Kapil Maheshwari	Member
Kiran Gupta	Member
Bangalore Branch Members	IC Role
Nivedita Komar	Member
Raju Krishna Shinde	Member
Chennai, Coimbatore, Madhurai & Salem branch Members	IC Role
Akila M	Member
Ganesh R	Member
Delhi, Chandigarh, Karnal & Jaipur Branch Members	IC Role
Harjinder Singh Chhabra	Member
Himanshu Dua	Member
Sachin Gambhir	Member
Saloni Mehendiratta	Member
Hyderabad, Vizag & Vijaywada Branch Members	IC Role
Sireesha K	Member
Venugopal Ramasetty	Member
Vijaya Lakshmi Goutha Raju	Member
Kolkata & Raipur Branch Members	IC Role
Dibya Ranjan Darjee	Member
Niloy Das	Member
Preeti Taparia	Member
Mumbai Branch Members	IC Role
Alpa Goel	Member
Smita Sagar Puthran	Member
Pune, Nagpur & Indore Branch Members	IC Role
Bhagyashree Phadke	Member
Nivedita Sushil Singh Rathor	Member

Annexure B

#	INCIDENT REPORTING FORMAT				
1	Date of Filing Complaint				
2	Details of Complainant				
	Name		Employee Code		
	Location		Department		
3	Complaint Made Against (Respondent)				
	Name		Employee Code		
	Location		Department		
4	Nature of Harassment (<i>Tick mark as applicable</i>)				
	Verbal		Visual		Physical
	Others (please specify)				
5	Description of the Incident				
	Date		Time	Place	
	Witnesses:				
	Brief Description:				
	Details about the sequence of events (if applicable):				
6	Signature of the Complainant				
7	To be filled by the Internal Committee				
	Findings of the Internal Committee:				
	Recommendations of the Internal Committee:				
8	Signatures of Internal Committee Members				
	Presiding Officer		External Member		
	Member 1		Member 2		
	Member 3		Member 4		