

Prevention of Sexual Harassment Policy

Objective:

IndiaFirst ("Company") philosophy is to encourage growth of individuals irrespective of gender, religion, caste or community to enable employees have safe, secure and congenial work environment, so that employees can deliver their best without inhibition.

Company is therefore committed to creating a safe and conducive work environment that enables all to work without fear of prejudice, gender bias and sexual harassment, where employer and employees respect each other's integrity and dignity, their privacy, their right to equality and right to opportunity in the workplace.

Equality in employment can be seriously impaired when individuals are subjected to discrimination by way of sexual harassment at workplace. Each such incident results not only in the violation of fundamental rights of "Gender Equality" and the "Right to Life and Liberty" under Articles 14, 15 and 21 of the Constitution of India but also in the violation of the victim's fundamental right under Article 19 (1) (g) "to practice any profession or to carry out any occupation, trade or business". The fundamental human rights to protection against sexual harassment and the right to work with dignity are also universally recognized by international conventions and instruments such as Convention on the Elimination of all Forms of Discrimination against Women ("**CEDAW**"), which has been ratified on the 25th June, 1993 by the Government of India. Pursuant to the Constitutional provisions mentioned above and India's commitment to the objectives of CEDAW, the Indian Parliament has enacted the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act and Rules, 2013 ("**the Law**") with the objective to provide protection against sexual harassment of women at workplace.

Company recognizes that the Law has been passed as a measure to provide equal opportunity to work to its women population and grant them equality under the Constitution of India. Thus, the procedure and the mechanism specified in Law has been provided keeping the women population in mind i.e. to prevent instances of sexual harassment of women at workplace and to have a complaints mechanism to address their complaints.

However, Company recognizes that genders other than women aren't immune to sexual harassment and can experience such behaviours at the workplace. Thus, Company is committed to provide a safe environment for all employees regardless of gender. Additionally, it is committed to create an ethos of acceptance and inclusivity at the workplace such that individuals regardless of their sexual orientation, sexual preferences, individuals belonging to LGBTQI community, choosing to not be in any of the socially constructed communities and adopting a fluid/non-binary approach

Company has therefore formulated this policy against sexual harassment at workplace ("Policy"),

Sexual Harassment: Scope

This Policy extends to all employees of the Company and is deemed to be incorporated in the service conditions of all employees and comes into effect immediately.

The Policy is with respect to Prevention, Prohibition & Redressal of Sexual Harassment which may arise in places not limited to geographical location viz. Company's offices / branches but includes all such places or locations where acts are conducted in context of working relationships or whilst fulfilling professional duties or which may be visited by an employee during the course of employment including transportation provided by the Company for undertaking such visit. Sexual Harassment is judged by the impact on the complainant and not the intent of the Respondent.

Sexual Harassment: Definition

1. **“Employee”** means any person employed at a 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 co-worker, a contract worker, probationer, trainee, apprentice or called by any other such name.
2. **“Workplace”**: This shall include all places where the work of the Company is carried out. It shall include:
 - i. All offices or other premises where Company’s business is conducted
 - ii. All Company related activities performed at any other site away from 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
 - iv. An alleged act of sexual harassment committed during or outside of office hours using any mode of communication including video calls/audio calls, phone calls, text, e-mails, any social media platform, or through any other electronic communication etc.
 - v. Any sexual harassment on any social networking website during or outside of office hours.
 - vi. Any place visited by the Employee arising out of or during the course of employment including transport services provided by the Company for undertaking such journey, guest houses of the Company, audio/video conferencing applications or any other communication related tools/applications. For example, Employees who are on overseas programs and trainings in course of their employment with the company.
 - vii. An alleged act of sexual harassment committed while working from home

3. Sexual Harassment:

Sexual Harassment will include any one or more of the following unwelcome acts or behaviour (whether directly or by implication) namely:

- a) Physical contact and advances including touching, deliberately brushing against another person, interference with an individual’s normal work movement or assault; or
- b) Demand or request for sexual favors offensive or unwelcome flirtations, unwanted sexual advances or propositions, threats or suggestive or insulting sounds.; and/ or
- c) Making any sexually colored remarks including sexual tones including repeated sexual innuendoes, sexual epithets, derogatory slurs, sexually explicit jokes, letters, phone calls, text, e-mail, and/ or sexually or repeated unwanted compliments and comments on one’s clothing, looks which may be considered as sexual in nature. or
- d) Asking inappropriate questions about a person’s personal sexual and love life, demanding or requesting explicit details about one’s marital relationship. or
- e) Showing pornography, derogatory or sexually explicit posters, cartoons, photographs, magazines, drawings, forwards, emojis, or other printed items or electronic content; suggestive objects, pictures. This can be sent through various modes such as emails, screen savers; or other electronic communications; graphic commentaries and leering or obscene gestures;
- f) Stalking someone in person, over social media, repeatedly sharing content or greetings when there is no response. Messaging calling someone over phone, social media without any prior consent to create an unwelcome personal rapport.
- g) any other unwelcome physical, verbal or non-verbal conduct of sexual nature

The following circumstances, among other circumstances, if it occurs or is present or 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 employment; or
- ii) implied or explicit threat of detrimental treatment in employment; or
- iii) implied or explicit threat about the present or future employment status;
- iv) interference with work or creating an intimidating or offensive or hostile work environment ; or
- v) Humiliating treatment likely to affect aggrieved person's health and safety

Each employee must exercise their own good judgment to avoid engaging in conduct that may be perceived by others as Sexual Harassment. In all the above cases, **it is not the intention but the impact of any such action.** Sexual Harassment is not specific to any gender or from any specific gender – it could be Male to Female, Female to Male, Male to Male, or Female to Female or male or female to transgender or any other.

4. **"Aggrieved Person" :**

Means any person, whether employed or not, who alleges to have been subjected and complained to any act of sexual harassment. The chain of command for the complainant can be any i.e. Subordinate can complain against the supervisor and also vice versa.

5. **"Employer" :**

Means person who are responsible for management, supervision and control of the workplace including appointment/removal/termination of employees.

6. **"Respondent"**

Shall refer to the person (i.e. the Employee of the Organization as defined above) against whom the complaint of sexual harassment has been filed.

7. **"Local Committee" :**

Means committee constituted by district officer in the district concerned to receive complaints of Sexual Harassment against the employer.

8. **"Visitor/Third Party"**

Includes any person who is visiting the Workplace and is not covered by any of the other categories defined by this Policy. For example, guests coming for physical/online interviews, meetings, events, programs or people walking in for meeting existing Employees, etc.

9. **"Complainant"**

Any person referred below will be called a complainant.

If the Aggrieved Person is unable to make a complaint on account of their physical incapacity, a complaint may be filed, with the written consent of the Aggrieved Person by:

- a) their relative or friend; or
- b) their co-worker; or
- c) an officer of the National Commission for Women or State Women's Commission (Only applicable where aggrieved person is a woman); or
- d) any person who has knowledge of the incident

If the Aggrieved Person is unable to make a complaint on account of mental incapacity, a complaint may be filed by:

- a) their relative or friend; or
- b) a special educator; or
- c) a qualified psychiatrist or psychologist; or
- d) the guardian or authority under whose care they are receiving treatment or care; or
- e) any person who has knowledge of the incident jointly with the Aggrieved Person's relative or friend or a special educator or qualified psychiatrist or psychologist, or guardian or authority under whose care they are receiving treatment or care.

If the Aggrieved Person 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 their written consent. If the Aggrieved Person is deceased, a complaint may be filed by any person who has knowledge of the incident, with the written consent of their legal heir.

Any reference to the term 'Complainant' throughout this Policy shall mean reference to 'Aggrieved Person' and / or the 'Complainant' as applicable.

Internal Committee (IC):

1. Composition

Company has constituted an IC and an Appeals Committee for receiving and redressing complaints related to sexual harassment at Workplace from Complainants.

At all times, the IC shall comprise of the following:

- i. At least one-half of the total members nominated to the IC shall be women. A senior level woman Employee shall be appointed as Presiding Officer of the IC ("**Presiding Officer**").

The Presiding Officer shall automatically vacate her office upon ceasing to be Employee of the Company.

In case a senior level woman employee is not available, the Presiding Officer shall be nominated from other offices or administrative units of the workplace.

In case the other offices or administrative units of the workplace do not have a senior level woman employee, the Presiding Officer shall be nominated from any other workplace of the same employer or other department or organization.

- ii. Minimum three (2) members of the IC 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. The members shall automatically vacate office upon ceasing to be Employee of the Company.
- iii. One (1) members from amongst non-governmental organizations or associations committed to the cause of women or a person familiar with the issues relating to Sexual Harassment. The member shall vacate office upon termination of contract with the Company.

- iv. Presiding Officer and every member of the Committee shall vacate the office after 3 years from the date of their nomination as specified by the employer
- v. The Member appointed from amongst the non-governmental organizations or associations shall be paid such fees or allowances for holding the proceedings of the Internal Committee, by the employer, as may be prescribed.
- vi. Employer will not form a part of Internal Committee.

2. Removal of IC members

An IC member shall be removed / replaced in the event that the IC member:

- i. breaches confidentiality; or
- ii. has been convicted for an offence or an inquiry into an offence under any law for the time being in force is pending against him/her; or
- iii. has been found guilty in any disciplinary proceedings or a disciplinary proceeding is pending against him/her; or
- iv. has abused his/her position as to render his/her continuance in office prejudicial to the public interest

On receipt of the complaint, if the Internal Committee member is from the same function as that of the Complainant or the Respondent to avoid any conflict of interest scenarios, the Employer will decide the names of the Internal Committee members (from the available list of Committee members as mentioned in **Annexure - A**) who would be looking into the matter. While identifying the committee members utmost care should be taken by the Employer.

Any vacancy created in the IC due to cessation of employment, resignation, death, disability or removal, as applicable, shall be filled by authorized person i.e. CHRO post approval from MD & CEO/Deputy CEO of the Company
Details of IC are given in **Annexure A**.

3. Responsibilities of authorised person i.e. CHRO

- i. Formulate and disseminate the Policy on Prevention of Sexual Harassment at Workplace.
- ii. Appointment, reappointment and removal of IC members.
- iii. To organize workshops and awareness programs at regular intervals for sensitizing employees.
- iv. To do all things necessary to comply with the POSH law such as signing the appointment letters, exit letters, Annual Reports etc.

Complaints Mechanism:

1. The Complainant can make a complaint of Sexual Harassment to the IC.
2. The complaint has to be in writing. The Complainant should provide as much specific detail as possible including incidents, dates and people that are involved in their complaint, though should avoid making general, broad and sweeping statements.
3. The Complainant is required to submit 6 copies of the complaint to the Internal Committee. The complaint should also contain details of incidents, name and details of the person against whom complaint has been made, list of witnesses and evidence in support of the complaint.
4. Complaint must be made within a period of 3 (three) months from the date of incident and in case of a series of incidents, within a period of 3 (three) months from the date of last incident.
5. The IC can extend the time limit for receiving a complaint to another period of 3 (three) months if it is satisfied that the circumstances were such which prevented the Complainant from filing a complaint within the first 3 (three) months.
6. IC will record the reasons for such extension of 3 (three) months in writing.
7. If the complainant needs assistance in writing the complaint, they can seek help from IC.
8. The complaint can be submitted to the IC electronically at complaints.committee@indiafirstlife.com or may be physically submitted to the IC
9. The complaint of Sexual Harassment should be factual and not speculative and should, to the extent possible, contain the following, in order to allow proper assessment of the nature and extent of the matter:
 - i. The alleged event, matter or issue that is subject to the complaint (Time/date/place to establish facts)
 - ii. The name and details of the Employee against whom the complaint is being filed ("**Respondent**")
 - iii. Names and addresses of the witnesses (if any)
 - iv. If the complaint involves a specific event or events, the approximate time & location of each event; and
 - v. Any additional information, documentation or other evidence available to support the complaint
10. Complaints against third parties

If any Company Employee is sexually harassed by any external party either in Company premises or in that external party's premises, then IC can contact the Internal Committee of

that external party and / or to the Police (as the case maybe), on the written complaint of such Employee to the Company's IC, and address the matter to satisfactory closure. Alternatively, Employee may choose to reach out directly to IC of that external party and / or Police (as the case may be) and Company will offer assistance, on written request by Employee.

11. Complaints against Employer

The Complainant is required to file a complaint of Sexual Harassment against employer to nodal officer designated by the district officer in the local committee basis geography.

Nodal officer on receipt of complaints, forward the same to concerned Local Committee within a period of 7 (seven) days. The nodal officer may send the same to the IC.

FILING OF COMPLAINT WITH POLICE (Only for women complainant)

Nothing in these rules and procedures shall preclude anybody from simultaneously lodging a complaint with the police in respect of any act amounting to an offence under the law. The company will provide assistance in this regard, if assistance is sought. This Policy is not intended to impair or limit the right of any Employee seeking a remedy available under any law. Proceedings under this Policy shall continue notwithstanding any proceedings initiated by a Complainant (as defined hereinafter) against Respondent under any law in force.

In case of a complaint of sexual harassment or any other offense against a child, as per the Protection of Children from Sexual Offences Act, 2012 ("**POCSO**"), or in case of offense by a child, the provisions under POCSO and Juvenile Justice (Care and Protection of Children) Act, 2015 may become applicable and would have to be dealt with in accordance with these laws. A child is any person below the age of eighteen years.

Complaint Handling Process

Procedure for Conciliation:

1. It is not mandatory for Complainant to request for Conciliation.
2. Prior to initiating an inquiry, the IC may, at the written request of the Complainant take steps to settle the matter between the Complainant and the Respondent through conciliation.
3. Monetary settlement cannot be made the basis of such conciliation.
4. In case a settlement has been arrived at, the IC shall record it and forward it to the employer to take action as specified in the recommendation of the IC.
5. The IC will also provide copies of the settlement as recorded to the Complainant and the Respondent.
6. If conciliation has been reached, the IC will not be required to conduct any further inquiry.
7. If Complainant feels that the terms of Settlement are not being complied with by the Respondent or action has not been taken by the employer, Complainant can make a written complaint to the IC to conduct an inquiry into the complaint.

Procedure for Inquiry:

1. If the Complainant and the Respondent do not wish to go for conciliation or if the conciliation reached between them is not complied with by either Complainant or Respondent, the IC shall, upon a written request from the Complainant to do so, conduct an inquiry into the complaint.
2. On receipt of the above mentioned complaint, Complainant to be spoken to and explained the process of redressal available to them as per law other rights under the law and policy.
3. Within a period of 7 (seven) working days., the Respondent be to be spoken to and explained the process of redressal available to them as per law other rights under the law and policy along with sending a copy of the complaint to the Respondent) within 7 days of receipt of the complaint asking him to furnish their written explanation against the allegation made by the

Complainant.

4. The IC may share the copy of the complaint before the first meeting with Respondent, to ensure timelines as per law are maintained.
5. The Respondent is required to file his/her reply along with supporting documents and list of witnesses and their details within 10 working days from the date of receipt of the copy of the complaint from the Internal committee which would be further investigated by the Internal Committee.
6. On receipt of the reply from the Respondent, the Internal Committee will schedule an enquiry in to the matter within 5 working days. Accordingly, the Internal Committee will communicate to both the concerned parties on the following:
 - i. Date of hearing
 - ii. Time of hearing
 - iii. Venue of hearing
 - iv. Name and details of the Internal Committee members
7. All inquiry proceedings will be documented in detail and treated as highly confidential with restricted viewing.
8. If the Complainant or the Respondent desires any witness/es to be called, they shall communicate in writing to the Internal Committee the names of witness/es whom they propose to call.
9. If the Complainant desires to tender any documents by way of evidence before the Internal Committee, they shall supply copies of such documents. Similarly, if Respondent desires to tender any documents in evidence before the Internal Committee they shall supply copies of such documents, such as as emails, messages, screenshots, photos, videos etc.. The authenticity of the documents to be confirmed over email/in writing by the requisite party furnishing the document.
10. The IC shall have the powers to summon and enforce the attendance of any person and conduct an examination, request the discovery and production of documents and / or any other matter which may be necessary for the inquiry process. Any refusal by any Employee of Company to attend any hearing before the IC when summoned or to provide to the IC, any documents and / or information within their power or possession shall constitute as misconduct, rendering such Employee for adverse action by Company.
11. IC shall notify in writing, the time and dates of its meetings to the Complainant, the Respondent and witnesses.
12. The IC shall make an inquiry into the complaint in accordance with the principles of natural justice such that IC shall provide every reasonable and fair opportunity to the Complainant and to the Respondent, for putting forward and defending their respective case.
13. Information given during the course of inquiry by the complainant, Respondent or any witness was false, the individual who provided the false information including the complainant will be subject to disciplinary action including termination.
14. In case if the Complainant or the Respondent failed to appear for three consecutive hearings, without sufficient cause and prior intimation, the Internal Committee is required to issue a 15 days' notice to the Complainant or Respondent as the case may be, intimating that on expiry of the 15 days, matter will be terminated or proceed ex-parte.
15. In conducting an inquiry at any point of time, the complaint shall be heard by a minimum of three member including the presiding officer and the external member. The enquiry in to the matter should be completed by the Internal Committee within 90 days.
16. Inquiry proceedings shall be recorded in writing. They may be audio recorded as well where possible. The written/transcribed record of the proceedings and the statement of witnesses shall be endorsed by the persons concerned and IC in token of authenticity thereof.
17. All parties and witnesses who are part of the IC proceedings will need to sign a confidentiality agreement/declaration.
18. Neither party shall be allowed to bring in any legal practitioner to represent them in their case at any stage of the proceedings before the Internal Committee.
19. All colleagues and witnesses who are a part of the proceedings will need to sign a confidentiality agreement.

Procedure for Action during Pendency of Inquiry

The Internal Committee, on the request of Complainant, may provide for following interim relief even without conducting an enquiry in to the matter:

- a) Transfer Complainant or Respondent to any other location; or
- b) Grant leave to Complainant up to three months over and above privilege leave; or
- c) Grant such other relief at to the Complainant as may be provided; or
- d) Restrain the Respondent from reporting on the work performance of the Complainant or writing their confidential report and assign the same to another head/officer; or
- e) Incase the complaint has been filed by an intern or an apprentice working under the respondent, restrain the respondent from supervising any official/academic activity of the complainant and assign the same to another officer; or
- f) Direct the Respondent to not communicate with the Complainant in any manner including any mode of electronic communication such as text messages, emails, , video/audio calls, on any social media platform or via any other mode of electronic communication.
- g) In case complaint is filed by a Complainant, the same benefits as above would apply, depending on facts and circumstances.

On receiving a recommendation from the IC, employer shall implement the recommendations and send a report of such implementation to the IC.

The Internal Committee is required to forward its interim recommendation to the employer and the employer is required to comply with the same within 7 working days and forward its report on the implementation of the recommendation forthwith to the Internal Committee.

Procedure for Preparing Inquiry Report and Suggesting Actions

1. On completion of inquiry, the IC shall provide a written report of its findings and recommendations to employer within **10 (ten) days** from date of completion of the inquiry.
 - Such report shall also be made available to Complainant and Respondent. This report will be given to parties for their representation. Findings report is not required if the complainant is not an employee.
2. This final inquiry report shall have recommendations of the IC depending on the findings and whether the allegations have been proven. The inquiry report shall specify details of the allegations against the Respondent, the statements made and evidence presented by the Complainant, Respondent and / or witnesses, IC's findings along with a statement giving reasons for the findings arrived at by the IC and IC's recommendations.
3. In the event that the IC arrives at the conclusion that the allegation against the Respondent has not been proved, it shall recommend to employer that no action is required to be taken in the matter.
4. Where the IC determines that prohibited harassment has taken place, to whatever extent, immediate corrective and preventive action will be taken, severity of action will be determined by the first time/ misunderstanding/ habitual offender etc IC shall provide recommendations for action in writing to the Employer to take action against the Respondent
5. The Employer will direct appropriate action in accordance with the recommendation proposed by the Internal Committee within 60 days of receipt of inquiry report.
6. In case the Respondent is found guilty, IC may recommend
 - i. a written apology from the Respondent
 - ii. a letter of warning may be given to the Respondent that will be placed in the personnel file
 - iii. reprimand or censure the Respondent
 - iv. withholding the promotion or reduction in rank
 - v. withholding of pay rise or increments
 - vi. immediate transfer or suspension without pay
 - vii. termination from service / dismissal from the services of the Company
 - viii. undergoing a counselling session
 - ix. carrying out community service
 - x. deduction from salary or wages of the Respondent such sum as it may consider appropriate to be paid to the Complainant or to their legal heirs. In case, Company is unable to make deductions from salary of the Respondent due to them being absent from duty or cessation of employment, it may direct the Respondent to pay such sum to the Complainant. In case the Respondent fails to pay the sum, the IC may forward the order for recovery of the sum as an arrear of land revenue to the concerned district officer.

Where the Respondent is a Third Party, IC may recommend any one or more of the following:

- Warning to employing Organization/association/firm (if any)
- Declaring the Workplace/Organization out of bounds to the Respondent
- Withdrawal of the right to provide services to Organization for a certain period (if applicable)
- Helping the Complainant in filing an FIR, should they desire
- Debarring/blacklisting such person from Organization
- Other similar or appropriate punishment

Employer shall act upon the recommendation given by IC within **60 (sixty) days** of receipt of the

Internal

recommendation.

Procedure for Determining Compensation

IC may consider various factors as required under the Act for the purpose of determining the sums to be paid to the Complainant and may take the following into consideration:

1. the mental trauma, pain, suffering and emotional distress caused to the Complainant
2. the loss in the career opportunity due to the incident of sexual harassment
3. medical expenses incurred by the victim for physical or psychiatric treatment
4. the income and financial status of the Respondent
5. feasibility of such payment in lump sum or in instalments

Procedure for Action to be taken in case of malicious complaints

- a) If on investigation, it is revealed that the complaint was made with a malicious intent and with the motive of maligning the concerned individual / tarnishing their image in the company and to settle personal / professional scores, strict action will be taken against the Complainant.
- b) In case IC arrives at a conclusion that allegation against the Respondent is malicious or Complainant has made the complaint knowing it to be false or has produced a forged or misleading document, IC may recommend to the Company employer to take an action applicable to Respondent if the complaint was genuine. In this regard, IC may recommend any of the actions specified from Clause 8 (i) to (ix) above.
- c) A mere inability to substantiate a complaint or provide adequate proof need not attract action against the Complainant as the malicious intent on the part of the Complainant will have to be established through the inquiry process before an action against such Complainant is recommended.

Appeal's Committee:

In case the inquiry process is conducted by the IC and the Complainant is a woman, any party aggrieved (Complainant or Respondent) by the recommendations of the IC and / or non-implementation of recommendations may file an appeal to the Appellate Authority as per service rules and/or as per other provisions of Law within 90 (ninety) days of the recommendations.

In case the complainant is not a woman, any party aggrieved by the recommendation or non-implementation of the recommendations made by the Internal Committee may prefer an appeal to the Appeal Committee of the Company within 15 days, the court or tribunal within 90 days from the date of the recommendation.

Details of the member of the Appeal Committee are specified in Annexure – A.

The Appeal Committee will review the recommendations of the Internal Committee within 30 days from the date of complaint made to the Appeal committee.

Confidentiality:

All discussions / decisions pertaining to an incident of sexual harassment must be kept confidential. Therefore, contents of the complaint made, the identity and addresses of the Complainant, Respondent and witnesses, any information relating to conciliation and inquiry proceedings, inquiry report including recommendations of the IC and action taken on the Respondent shall not be published, communicated or made known to the public, press and media in any manner. However, information may be disseminated regarding the justice secured to any victim without disclosing the name, address, identity or any other particulars calculated to lead to the identification of the Complainant and witnesses.

Appropriate information will be shared with Government authorities as per the Act. If any employee or person (including witnesses) breaches confidentiality, Company shall recover a sum of rupees five thousand (5,000) as penalty from such person and may take any other action as it may deem fit.

Protection against Retaliation:

Company will not accept, support or tolerate retaliation in any form against any employee who, acting in good faith, reports suspected misconduct, asks questions or raises concerns. Any person who engages in such retaliation directly or indirectly, or encourages others to do so, may be subject to appropriate disciplinary action. While dealing with any complaint of sexual harassment, the IC shall ensure that the Complainant or the witness are not victimized or discriminated against by the

Respondent.

Responsibilities of the Employees:

- i. All employees in the Company have shared responsibility of creating and sustaining a healthy work environment.
- ii. No employee is to threaten or insinuate, either explicitly or implicitly, that a employee's refusal or willingness to submit to sexual advances will affect employee's terms or conditions of employment.
- iii. They should support during any inquiry of a complaint, including testifying as witness and giving full and truthful disclosure of all factual information when asked by the IC, while ensuring that complete confidentiality is maintained throughout, about any case of sexual harassment within the Company.
- iv. They should set an example of dignified workplace behavior and ethical standards in line with Company's values and code of conduct.
- v. They should be aware that Company will take allegations seriously and will ask their cooperation in an investigation if they bring a complaint forward.
- vi. They should handle information related to known or suspected violations of this Policy in a discreet and confidential manner and not attempt to investigate / inquire into the information or suspected violations of this Policy on their own i.e. without involving the IC.
- vii. They should report any inappropriate behavior by colleagues / guests / vendors to IC immediately.
 - viii) With respect to virtual working:
 - (i) Ensure that video/audio calls are scheduled during working hours as much as possible.
 - (i) State the preferred modality (video or audio) while scheduling the meeting/ blocking other person's calendar & allow for flexibility for the individual to confirm
 - (ii) Seek consent before requesting for a video call for a one on one conversation
 - (iii) Do not insist on video calls where not necessary, and/or if your colleague/s expresses difficulty in joining via video call.
 - (iv) While on video/audio calls, be mindful of the professional boundaries, and do not initiate conversations/jokes that could make others uncomfortable.
 - (v) While on video calls, ensure that a professional dress code is followed, and the background does not have anything inappropriate.
 - (vi) Do not share/forward inappropriate or offensive posts or images on team chat or social media, etc
 - (vii) Do not forward any personal message, image, or video sent to you without sender's consent
 - (viii) Do not repeatedly send messages to engage in personal discussions, comment, like on posts, pictures etc. in absence of any positive, enthusiastic response
 - (ix) Do not repetitively ask any employee to accept your friend/follow request on any social media platform
 - (x) Do not engage in online bullying, stalking or harassment.

Responsibilities of the IC:

The primary responsibilities of IC are:

- i. Receive and address complaints of sexual harassment only
- ii. Hold meeting once in every 6 (six) months.
- iii. Follow the principles of natural justice and treat the Complainant, Respondent, witnesses and related persons to the inquiry with dignity and respect and give both the Complainant and the Respondent a fair opportunity to make their submissions. All members of the IC shall be acting without any prejudice or bias while conducting inquiries or dealing with complaints of sexual harassment in any other manner.
- iv. Ensure quorum of minimum three (3) members is met during all Inquiry meetings, with mandatory presence of the Presiding officer at all Inquiry meetings.
- v. Assist Complainant in filing the complaint, in case the Complainant is unable to do so.

- vi. Inquiry shall be a priority for an IC member.
- vii. Make efforts to ensure that the Complainants and the witnesses are not further victimized or discriminated against while the complaint is pending.
- viii. They shall recuse themselves from their assigned job for the purpose of conducting an Inquiry if there is conflict of interest or a bias coming in the way of conducting a fair Inquiry. Taking appropriate remedial measures to respond to any substantiated allegations of sexual harassment from warning to termination depending upon severity of deviation.
- ix. Documenting in detail all the inquiry proceedings and the inquiry report.
- x. The IC members shall refrain from talking about a potential, pending or completed case of sexual harassment to any member directly or indirectly connected to any form of media, including print, Television, online media etc.
- xi. Review the status of all complaints received by IC.
- xii. Take action against anyone who threatens or intimidates the Complainant or members of the IC.
- xiii. Conduct interactive awareness trainings / programs for employees, special meetings if required.

In the event, the complaint does not fall under the purview of sexual harassment or the complaint does not mean an offence of sexual harassment, the same would be dropped after recording the reasons thereof and forwarded to the concerned person.

Responsibilities of the Company:

- i. Company will not tolerate any act of sexual harassment. It shall treat sexual harassment as 'Misconduct' and take prompt, appropriate action for the same.
- ii. It will organize gender-sensitization workshops and awareness programs at regular intervals for all employees covering all locations and orientation programmes for the members of the Internal Committee.
- iii. Shall raise awareness about the prevention of sexual harassment through physical and digital mediums.
- iv. It will monitor the timely submission of reports by the IC.
- v. It will ensure that necessary facilities and information are provided to the IC for dealing with the complaint and conducting an inquiry.
- vi. Assist in securing the attendance of Respondent and witnesses before the IC and make available such information to the IC as it may require with regards to the complaint.
- vii. Provide assistance to the Complainant if the Complainant chooses to file a complaint in relation to the offence under the Indian Penal Code.
- viii. Cause to initiate action, under the Indian Penal Code, against the Respondent, or if the Complainant so desires, where the Respondent is not an employee, in the workplace at which the incident of sexual harassment took place.
- ix. It will offer counselling sessions to complainant, respondent or anyone impacted by incident of sexual harassment.

Disciplinary Action

Based on the investigations and findings of the Internal Committee and its report, disciplinary action shall be initiated. The Chief Human Resource Officer shall initiate the following action, including termination of employment, on receipt of the recommendation from the Internal Committee.

- If the Respondent is found guilty of Sexual Harassment as per definition stated above, the services of the Respondent would be terminated or such action would be initiated as recommended by the Internal Committee in accordance with the Act and Service Rules of the Company
- The Internal Committee can also recommend deduction of an appropriate amount from the salary of the guilty person such sum as it may consider necessary to be paid to the complainant as the case may be. In case of failure of the respondent to pay the said sum, the Internal Committee shall forward the order for recovery of the sum as an arrear of land revenue to the concerned district officer.

Disclosure in Annual Report

The Internal Committee on annual basis shall prepare and disclose the information relating to Sexual Harassment in Annual Report as per "The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013" and as amended from time to time.

Review of the Sexual Harassment Policy:

The Sexual Harassment Policy will be reviewed once annually or at such intervals as and when required by the Employee Conduct, Risk and Compliance forum of the Company.

Note: The Company reserves its right to modify the provision of the Policy any time without any notice in consultation with its Employee Conduct, Risk and Compliance forum. The employees are advised to read the applicable laws and rules on the subject and get themselves well versed with the law of the land.

Annexure A

Internal Committee for all offices in North Zone

Chairperson for Internal Committee

S. No.	Name	Designation	EMP ID
1	Bhavna Verma	Appointed Actuary	1011899

Committee members for Internal Committee

S. No.	Name	Designation	EMP ID
1	Amrish Maheshwari	Chief Risk Officer	1015957
2	Kedar Patki	Chief Financial Officer	1007735
3	Shalini Sharma	Head - Renewals and Persistency	1010109
4	Karishma Sinha	Chief of Staff - MD and CEO Office	1008171
5	Lakshita Bhati	External Member	NA

Representative Member

North	Central IC + North Zone Representative	Preeti Chaudhary	Senior Regional Operations Manager	1004657
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Internal Committee for all offices in South Zone

Chairperson for Internal Committee

S. No.	Name	Designation	EMP ID
1	Bhavna Verma	Appointed Actuary	1011899

Committee members for Internal Committee

S. No.	Name	Designation	EMP ID
1	Amrish Maheshwari	Chief Risk Officer	1015957
2	Kedar Patki	Chief Financial Officer	1007735
3	Shalini Sharma	Head - Renewals and Persistency	1010109
4	Karishma Sinha	Chief of Staff - MD and CEO Office	1008171
5	Lakshita Bhati	External Member	NA

Representative Member

South	Central IC + South Zone Representative	Rekha Jawalkar	Senior Regional Operations Manager	1001224
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Internal Committee for all offices in East Zone Chairperson for Internal Committee

S. No.	Name	Designation	EMP ID
1	Bhavna Verma	Appointed Actuary	1011899

Committee members for Internal Committee

S. No.	Name	Designation	EMP ID
1	Amrish Maheshwari	Chief Risk Officer	1015957
2	Kedar Patki	Chief Financial Officer	1007735
3	Shalini Sharma	Head - Renewals and Persistency	1010109
4	Karishma Sinha	Chief of Staff - MD and CEO Office	1008171
5	Lakshita Bhati	External Member	NA

Representative Member

East	Central IC + East Zone Representative	Anshuman Chatterjee	Senior Regional Operations Manager	1009927
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Internal Committee for all offices in West Zone

Chairperson for Internal Committee

S. No.	Name	Designation	EMP ID
1	Bhavna Verma	Appointed Actuary	1011899

Committee members for Internal Committee

S. No.	Name	Designation	EMP ID
1	Amrish Maheshwari	Chief Risk Officer	1015957
2	Kedar Patki	Chief Financial Officer	1007735
3	Shalini Sharma	Head - Renewals and Persistency	1010109
4	Karishma Sinha	Chief of Staff - MD and CEO Office	1008171
5	Lakshita Bhati	External Member	NA

Representative Member

West	Central IC + West Zone Representative	Swati Agarwal	Senior Regional Operations Manager	1004808
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Chairperson for Appeals Committee

S. No.	Name	Designation	EMP ID
1	Poonam Tandon	Chief Investment Officer	1000959

Committee members for Appeals Committee

S. No.	Name	Designation	EMP ID
1	Atri Chakraborty	Chief Operating officer	1008902
2	Subhankar Sengupta	Chief Marketing & Development Officer	1007914
3	Heena Bhagchandani	Principal Officer - Gift City	1004668
4	Firuz Hoshedar Elavia	Head – Branch Operations	1010431