

POLICY FOR PREVENTION OF SEXUAL HARASSMENT (POSH)

This policy for prevention of sexual harassment (“**Policy**”) has been framed in accordance with the provisions of “The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013” and rules framed thereunder (hereinafter “**the Act**”). Accordingly, while the Policy covers all the key aspects of the Act, for any further clarification reference shall always be made to the Act and the provisions of the Act shall prevail. Any amendments to this Policy shall be notified to all concerned via emails and displayed prominently in the workplace.

Further, our success is based on our people. We treat each other with respect and dignity and expect everyone to promote a sense of personal responsibility. We recruit competent and motivated people who respect our values, provide equal opportunities for their development and advancement; protect their privacy and do not tolerate any form of harassment or discrimination.

The Policy on Prevention of Sexual Harassment of women at workplace: Guidelines for Indorient Financial Services Limited (“**IFSL**”) intends to provide protection against Sexual Harassment (*as defined below*) of women at workplace and the prevention and redressal of abusive behaviour and complaints of Sexual Harassment and matters related to it.

1. SCOPE:

IFSL aims to adopt zero tolerance attitudes against any kind of Sexual Harassment or discrimination caused by any employee during their tenure in IFSL towards any other person in the workplace from such behaviour. The Policy seeks to lay down the mechanism for redressal of grievances of individuals (being an Employee, client, vendor, staff of IFSL or any other person visiting the office of IFSL) at the workplace against Sexual Harassment or abuse.

2. APPLICABILITY:

All Employees of IFSL at all locations.

3. DEFINITION:

Sexual harassment may occur not only where a person uses sexual behaviour to control, influence or affect the career, salary or job of another person, but also between co-workers. It may also occur between a IFSL Employee and someone that Employee deals within the course of their work who is not employed by IFSL. Sexual Harassment shall be considered misconduct under the employee policy of the IFSL in force and action will be taken against the Respondent in the manner provided in this Policy in line with IFSL employee policy.

“Sexual Harassment” includes any one or more of the following unwelcome sexually determined acts or behavior (whether directly or by implication) in the Workplace, such as:

- a. Any unwelcome sexually determined behavior, or pattern of conduct, that would cause discomfort and/or humiliate a person at whom the behavior or conduct was directed namely:
 - I. Physical contact and advances including grabbing, brushing, touching, sexual flirtations, or propositions;
 - II. Demand or request for sexual favours, whether directly or by implication, and/or making it a condition of employment / payment of wages / increments / promotion / preferential treatment / threat to detrimental treatment in employment/ threat to

- current or future employment status or similar act, such as, (i) supervisor demanding such favours in exchange for actual or promised job benefits, favourable reviews, promotions and increments; (ii) Employees gossiping about one's sexual life, deficiencies or prowess in an attempt to humiliate or make another person uncomfortable;
- III. Sexually coloured remarks about a person's clothing or body, cracking jokes or using sentences with sexual connotations or making sexist remarks etc;
 - IV. Showing written or electronic material/ including pornographic and sexually explicit visual material, demeaning or offensive pictures, cartoons, pinups, calendars, screensavers on computers, making or posting sexual pranks, sexual teasing, vulgar / indecent / sexual jokes, offensive gestures, phone calls, letters, text messages or other materials through emails, SMS, MMS, etc exhibiting conduct of a sexual nature;
 - V. Repeatedly asking to socialize during off-duty hours or continued expressions of sexual interest;
 - VI. Molestation, touching against one's wishes;
 - VII. Giving gifts or leaving objects, displaying pictures, signs etc. that are sexually suggestive, i.e., with sexual nature / connotation / overtones in the work area and work related areas;
 - VIII. Eve teasing, innuendos and taunts (sounds which have explicit and / or implicit sexual connotation / overtones), physical confinement against one's will or any such act;
 - IX. Acts likely to intrude upon one's privacy or presently asks them out;
 - X. Persistent watching, stalking / following, contacting of a person;
 - XI. Verbal or non-verbal communication which offends the individual's sensibilities and affects their performance and has sexual connotation / overtone / nature;
 - XII. Any other unwelcome physical, verbal or non-verbal conduct of sexual nature or any behaviour which creates an environment that is intimidating, hostile, offensive, humiliating for the Employees.
- b. The following circumstances, by way of illustration, if it occurs or is present in relation to any sexually determined act or behavior amount to Sexual Harassment:
- I. Implied or explicit promise of preferential treatment in employment of the Aggrieved Person;
 - II. Implied or explicit threat of detrimental treatment in employment of the Aggrieved Person;
 - III. Implied or explicit threat about the present or future employment status of the Aggrieved Person;
 - IV. Interference with the work or creating an intimidating or offensive or hostile work environment for an Aggrieved Person; or
 - V. Humiliating treatment likely to affect a person's health or safety of the Aggrieved Person.

The reasonable person standard is used to determine whether or not the conduct was offensive and what a reasonable person would have done. Further, it is important to note that whether harassment has occurred or not, does not depend on the intention of the people but on the experience of the Aggrieved Person. In accordance with the Act, any complaint of Sexual Harassment made by a male Employee shall only be treated as defense and can be made part of IC proceedings.

Aggrieved person: In relation to a workplace, a woman, of any age, whether employed or not by IFSL, who complains or alleges to have been subjected to any act of Sexual Harassment by the Respondent (*as defined below*) and includes contractual, temporary, visitors of IFSL.

District Officer: means the district officer notified by the appropriate government under section 5 of the Act, from time to time.

Designated Person(s): means any Member assigned by the Internal Committee to carry out functions specified under this Policy.

Employee: All employees and professionals employed at the workplace, for any work on regular, temporary (such as intern), or working as consultants, ad-hoc (such as a secondee) or daily wage basis, either directly or through an agent, including a contractor, , whether for remuneration or not, or working on a voluntary basis or otherwise, whether the terms of employment are express or implied and includes a coworker, a contract worker, probationer, trainee, apprentice or by any other such name.

Internal Committee or IC: means a body comprising the following persons or such other persons nominated by IFSL from time to time in accordance with the Act and set under section 6.

Management: means IFSL's Managing Director / Director(s) or such other Officer(s) / Nominee(s) as may be authorized in this behalf by the Managing Director / Director(s) of IFSL and notified in the notice board of the establishment.

Member: means a member of IC.

Respondent: means a person against whom a complaint of Sexual Harassment has been made by the Aggrieved Person in accordance with this Policy.

Workplace: In addition to the place of work [Head office / Branch offices, Factories] and all units / establishments of IFSL, including the premises of IFSL's clients, customers, vendors and associates where IFSL's Employees, contractors and their workmen are required to work at or visit on IFSL's business. It shall also include any external location / place where the Employee visits in connection with their work, during the course of and/or arising out of employment/ contract/ engagement with IFSL, including transportation provided by IFSL for undertaking such a journey and private residence of the Aggrieved Person or Employee engaging in Sexual Harassment.

Work from home scenarios / Remote Working: The act of Sexual Harassment must be related to employment or work. Hence, acts committed outside the office, for example in the cafeteria, on business travel in a flight or hotel, place of visit for official purpose such as client premises, offices, official events, etc. are covered. Additionally, acts that are committed during Work from Home arrangements that are authorized and/ or mandated by the Organization would fall within the ambit of Sexual Harassment at the workplace. "Work From Home" here refers to a situation wherein Employees are working from a remote location which is not the Organization's physical premises, client/ vendor premises, or any other location. Actions which take place in personal capacity will not be considered workplace concerns unless there is connection with the workplace for the Aggrieved Person.

4. THIRD PARTY HARASSMENT:

- a. Non-managers, as well as managers, can be harassers as well as harassed, so can third parties (not employed with IFSL) present in IFSL work environment. Anyone can, by

subjecting someone else to a hostile work environment, engage in Sexual Harassment. Third party harassment means Sexual Harassment perpetrated by visitors, patrons, vendors, independent contractors, auditors, consultants, and others with whom the Aggrieved Person have come in contact, directly or indirectly, because of the Organization having a relationship/ business relationship with them.

- b. Where the Sexual Harassment at the Workplace occurs as a result of an act or omission by any third party, the Organization shall take all steps necessary and reasonable to assist the Aggrieved Person in terms of support and preventive action.

5. GRIEVANCE MECHANISM: PROCEDURE TO REGISTER COMPLAINTS:

- a. An Aggrieved Person can:
 - I. Tell the harasser that their behavior is unwelcome and ask them to stop.
 - II. Keep a record of incidents (for example the dates, times, locations, witness (if any), what was done and how the Aggrieved Person responded).
 - III. Report the incident to the Management of IFSL. Thereafter, the Management shall forward the complaint to the local police or the IC for action.
- b. A complaint shall be submitted in writing (6 copies) by the Aggrieved Person accompanied by supporting documents and relevant details concerning the alleged act of Sexual Harassment including names and address of witnesses, if any, which the Aggrieved Person believes to be true and accurate, to grievances@indorient.in or to any Member of the Internal Committee mentioned herein within 3 months of occurrence of an act of Sexual Harassment. If the Respondent is direct supervisor of the Aggrieved Person, or is any such person influencing the career growth of the Aggrieved Person, the reporting structure will be changed till the time the enquiry is completed.
- c. However, if the Aggrieved Person is illiterate or unable to make the complaint themselves on account of their physical or mental incapacity, (a) the Management shall take note of complaint made orally and shall reduce the oral statement in writing and read out the same to the Aggrieved Person or (b) where the complaint has been written by some person other than the Aggrieved Person, the same shall be taken on record after hearing the oral account provided by the Aggrieved Person.

6. INTERNAL COMMITTEE:

- a. Each complaint of Sexual Harassment shall be dealt with utmost confidentiality and urgency by an Internal Committee consisting of:

Name of Individual	Email ID	Mobile no	Role on IC
Ms. Amina Khan	amina@indorient.in	85839 04539	Presiding/ Nodal Officer
Ms. Archana Balasubramanian	archana@agamalaw.com	98203 02703	External Member
Ms. Aurea Pereira	aurea@indorient.in	95456 37266	Member
Mr. Prashant Dhebar	prashant@indorient.in	98209 39205	Member

- b. Within 7 working days, the Internal Committee shall commence official internal enquiry by:
 - I. By informing the said complaint to the Respondent.
 - II. By instructing to stop the alleged act of Sexual Harassment immediately.

- III. By informing not to reach out to the Aggrieved Person directly or indirectly.
 - IV. By asking an immediate explanation from Respondent to the same.
- c. Within 5 working days from the receipt of original complaint, the Designated Person shall respond in writing to the Aggrieved Person informing her about the initial steps taken by IFSL in order to stop the alleged act(s).
 - d. The Respondent within 10 working days from the date of receipt of the complaint from the IC shall file the response to the complaint along with the list/ original copies of supporting documents, names and addresses of witnesses, if any.
 - e. The IC shall consider the reply from the Respondent and initiate an inquiry. The Internal Committee shall record and accordingly communicate in writing to the Aggrieved Person and the Respondent, its prima facie findings, upon giving the concerned parties a fair and due opportunity to represent themselves and upon conducting fact finding, truth verification and counselling sessions with persons involved in alleged act(s).
 - f. A complaint will be closed no later than one month from receipt of original complaint by recording the decisions of the Internal Committee, accordingly informing to the Aggrieved Person and the Respondent of the same.
 - g. Employees are duty bound to assist in investigative steps, Employees' wholehearted participation shall be mandatory in this regard. Whistleblowers shall be protected from exposure, retaliation or hostility.
 - h. Within 2 working days from receipt of prima facie findings or the charges, if the Aggrieved Person or the Respondent is dissatisfied with the decision of Internal Committee, she or he may appeal specifying the reasons in writing to Managing Director. Within 5 working days from the receipt, the appeal shall be finally disposed of by written communication to the said party.

7. REDRESSAL:

- a. An amicable resolution of the complaint is possible only with the written consent of the Aggrieved Person.
- b. Within 24 hours of closing the case file, the Internal Committee shall present the same to and inform its decision to the Managing Director.
- c. In case of decision establishing the offence of Sexual Harassment of the Aggrieved Person, within 3 working days, the Internal Committee shall recommend disciplinary action against the offender considering the nature and extent of injury caused to the Aggrieved Person, prior complaints or repetition of offence etc and the impact of the offence on IFSL's profile as a whole.
- d. The position of the Respondent and the criticality of the position occupied by the Respondent shall not be any hindrance to the disciplinary action taken against the Respondent.
- e. The disciplinary action that shall be commensurate with the nature of the gravity of the offence, shall include but not limited to:
 - Warning;
 - Written apology from offender;
 - Bond of good behavior;
 - Transfer;

- Debarring from supervisory duties;
 - Denial of Employee benefits like increments/promotion/salary correction etc;
 - Cancellation of specific work assignment;
 - Suspension;
 - Dismissal;
- f. Annual report summarizing complaints and Redressal of Sexual Harassment shall be prepared by Designated Person. The said report as well as all documents regarding Sexual Harassment complaints shall be in the custody of Designated Person and will be termed as 'Strictly Confidential'.

8. CONFIDENTIALITY:

- a. All information pertaining to Sexual Harassment claims and proceedings including without limitation, the identity, personal details and addresses of the Aggrieved Person, the Respondent, the witnesses, any information related to the conciliation and the proceedings recommendations of the Local Complaints Committee and action taken by the Management or District Officer shall be kept in strict confidence (“**Confidential Information**”). The information shall be available only to the Management and the parties i.e., only those people directly involved in resolving the complaint will have access to the relevant information.
- b. Records created including the complaint, any representation from either party, witness accounts, records of conciliatory settlement, and any such information shall be stored securely and separately by IFSL, and only accessed in the event of a further relevant concern or subsequent legal action by persons expressly authorized to do so by the Management.
- c. Records will not appear on Employee files except where a formal investigation has established that the individual has breached IFSL policy and disciplinary actions are to be followed.

9. MALICIOUS COMPLAINT:

- a. This Policy has been evolved to ensure that Employees have a forum to approach in the event of instances of Sexual Harassment. However, 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 IFSL and to settle personal/professional scores, strict action will be taken against the Aggrieved Person, which can include the following:
- I. A written apology to the Respondent from the Aggrieved Person;
 - II. A letter of warning may be given to the Aggrieved Person;
 - III. Reprimand or censure the Aggrieved Person;
 - IV. Withholding the promotion;
 - V. Withholding of pay rise or increments;
 - VI. Immediate transfer or suspension without pay;
 - VII. Termination from service;
 - VIII. Undergoing a counselling session; or
 - IX. Carrying out community services.

- b. As already stated, a mere inability to substantiate a complaint or provide adequate proof need not attract action against the Aggrieved Person as the malicious intent on the part of the Aggrieved Person will have to be established through the inquiry process before an action against such Aggrieved Person is recommended.

10. RESPONSIBILITY OF EMPLOYEES:

Employees shall have the following responsibilities, duties and obligations towards IFSL and other co-workers, in general:

- I. To support/co-operate during any investigation as part of the inquiry process and provide a full truthful disclosure of relevant information and assist with investigation.
- II. Be aware of and abide by laws applicable to them, their job and IFSL policies and procedures and set an example of proper workplace behavior and ethical standards.
- III. Be aware that IFSL will take allegations seriously and will ask their cooperation in an investigation if they bring a complaint forward.
- IV. Participate in the procedure of investigation if a complaint is brought forward, it will be reviewed. If an Employee elects not to participate in the procedure constituted by IFSL and does not wish to proceed with the complaint, it will need to be formally withdrawn. The Complaint will still be reviewed, and the findings of the complaint will be explained in writing. It will be the discretion of the Management to accept or reject the request for withdrawal of the complaint.

11. NON-RETALIATION POLICY:

- a. Any form of retaliation or ill behavior against an Aggrieved Person reporting or making a complaint of Sexual Harassment is prohibited by this Policy. Retaliation includes any hurtful employment action against the Aggrieved Person.
- b. Workplace retaliation includes negations actions taken against an Employee who inquired about, reported, or participated in investigations concerning misconduct such as discrimination, harassment, safety violations, and fraud. Having a policy against retaliation is vital to ensuring that Employees feel safe coming forward about violations of the law, regulations, or IFSL policy.
- c. Regardless of the outcome of the complaint made in good faith, the Employee lodging the complaint and any person providing information or any witness, will be protected from any form of retaliation. IFSL 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.
- d. IFSL shall not accept, support or tolerate victimization or retaliation measures of any kind against any person, who acting in good faith, reports acts, of Sexual Harassments. Any person who engages in such retaliation/ victimization, directly or indirectly or encourages others to do so would be subject to appropriate disciplinary action.

To:

The Presiding Officer
Internal Complaints Committee (ICC)
Indorient Financial Services Limited
B/805, Rustomjee Central Park, Andheri Kurla Road,
Chakala, Mumbai – 400093, Maharashtra, India
Email: compliance@indorient.in

Sub: Complaint of Sexual Harassment at Workplace

1) Complainant Details:

- **Full Name:**
- **Designation:**
- **Department:**
- **Contact Information:** [Phone Number and/or Email Address]

2) Alleged Harasser Details:

- **Full Name:** [Name of the Person You're Complaining Against]
- **Designation:** [Their Designation]
- **Department:** [Their Department]
- **Relationship to Complainant:** [e.g., Supervisor, Colleague]

3) Incident Details:

- **Date(s) and Time(s) of Incident(s):** [Provide Specific Dates and Times]
- **Location(s) of Incident(s):** [Specify the Location(s)]
- **Description of Incident(s):** [Provide a detailed account of the incident(s), including what was said or done, and any other relevant information.]

4) Witnesses (if any):

- **Name(s):** [List any individuals who witnessed the incident(s)]
- **Contact Information:** [Provide their contact details]

5) Evidence (if any):

- [List and attach any supporting documents, emails, messages, or other evidence related to the incident(s).]

6) Previous Actions Taken (if any):

- [Mention if you've reported the incident(s) to anyone else, such as a supervisor or HR, and any actions taken.]

7) Relief Sought:

- [Specify the outcome you're seeking, such as an investigation, disciplinary action, or counselling.]

Declaration:

I hereby declare that the information provided above is true to the best of my knowledge and belief.

Date: [Insert Date]

Signature: [Your Signature]