

SUPREME HOUSING FINANCE LIMITED

Policy on Prevention of Sexual Harassment (POSH) at work place

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The policy on prevention of sexual harassment at workplace is a statutory requirement and is guided by Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) (SHWW) Act, 2013.

- I. **Objective:** Supreme Housing Finance Limited (“SHFL”) is committed to creating a safe work environment that is free from any form of sexual harassment and where all employees are treated with dignity and respect. SHFL is dedicated to maintain an environment which is free from coercion and intimidation.

SHFL shall adopt certain procedures and guidelines to govern cases against sexual harassment. The procedure has been provided in SHFL’s policy against sexual harassment (“Policy”).

All allegations of sexual harassment shall be taken seriously by SHFL and shall be governed by this Policy.

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

- II. **Applicability:** This policy is applicable to all employees of all the branches/units of SHFL who are on rolls or on contract, customers, suppliers or vendors, consultants, visitors, etc. The policy covers harassment of women by men or men by women. This is a zero tolerance policy irrespective of who is involved.

III. **Definitions:**

Complainant: In relation to a workplace, an aggrieved person, of any age, whether employed or not, who alleges to have been subjected to any act of sexual harassment by the respondent and includes contractual, temporary, visitors.

Respondent: A person against whom a complaint of sexual harassment has been made by the aggrieved person.

Employee: A person employed at the 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 coworker, a contract worker, probationer, trainee, apprentice or by any other such name.

Employer: A person responsible for management, supervision and control of the workplace.

Sexual harassment: It includes any one or more of the following unwelcome acts or behavior (whether directly or indirectly) namely:

- Physical contact and advances; or
- A demand or request for sexual favours; or
- Making sexually coloured remarks; or
- Showing pornography or offensive pictures or written materials; or

- Verbal – unpleasant or suggestive remarks, personal comments, jokes causing embarrassment, innuendos and taunts, sexist remarks (gender based insults) and offensive telephone calls/messages
- Implied or explicit promise of preferential treatment in his/her employment; or
- Implied or explicit threat of detrimental treatment in his/her employment; or
- Implied or explicit threat about his/her present or future employment status; or
- Interference with his/her work or creating an intimidating or offensive or hostile work environment for her; or
- Humiliating treatment likely to affect his/her health or safety
- Any other unwelcome physical, verbal or non-verbal conduct of sexual nature.

Workplace includes:

- Within the premises of the office/sites/branches
- Any place visited by the employee whether on roll or on contract, arising out of or during the course of the employment
- Transportation provided by the SHFL or during travel whether in the own vehicle or of others or hired
- Guest house/hotel where an employee whether on rolls or on contract, is staying while on duty

IV. Internal Complaints Committee: The Internal Complaints Committee (ICC) is constituted to consider and redress complaints related to sexual harassment. The Constitution of ICC is as per the Act and includes external member from NGO or person familiar with the issues relating to sexual harassment.

The committee at each location comprises of:

- a) Presiding Officer: A woman employed at a senior level in the SHFL;
- b) At least two members from amongst the employees who are committed to the cause of the women or the person familiar with issues relating to sexual harassment;
- c) One member from the NGO/Association who would be paid fees or allowances for holding the proceedings of the Internal Complaints Committee;

One-half of the total members must be women.

The committee is responsible for:

- Receiving complaints of sexual harassment at the workplace;
- Initiating and conducting inquiry as per the established procedure;
- Submitting findings and recommendations of inquiries;
- Coordinating with the employer in implementing appropriate action;
- Maintaining strict confidentiality throughout the process as per established guidelines;
- Submitting annual reports in the prescribed format;

Nomination: The Board of Directors nominates the Presiding Officer and the members of ICC.

Term of Office: The Presiding Officer and every member of the Internal Complaints Committee will hold the office for a period not exceeding three years from the date of the nomination or the new constitution approved by the Board of Directors whichever is later.

The ICC is governed by the rules of Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and the Ministry of Women & Child Development notification dated 9th December 2013 or any other legislation, rules or notifications as may be enacted later on.

Current nominated members of the committees are given in Annexure A.

V. Lodging a Complaint:

The complainant needs to submit a detailed complaint, along with any documentary evidence available or names of witnesses, to any of the committee members at the workplace.

The Complaint shall be lodged in written to any of the committee member(s) or through email on following ids:

- **compliance@supremehomeloans.com, and;**
- **hr@supremehomeloans.com**

The complaint must be lodged within 3 months from the date of incident/ last incident. The Committee can extend the timeline by another 3 months for reasons recorded in writing, if satisfied that these reasons prevented the lodging of the complaint.

Provided that if the complainant is unable to lodge the complaint in account of her/his incapacity, the following may do so on her/his behalf, with her/his written consent:

- Legal heir, relative or friend
- Co-worker
- Any person having the knowledge of the incident

If the initial complaint is made to a person other than a committee member, upon receiving such a complaint, it will be the responsibility of the complaint receiver to report the same to the committee immediately.

Wherever possible SHFL ensures that all the complaints of harassment are dealt with speedily, discreetly and as close as possible to the point of origin.

VI. Receiving a Complaint (guidelines):

Dealing with incidents of harassment is not like any other type of dispute. Complainants may be embarrassed and distressed and it requires tact and discretion while receiving the complaint.

The following points are kept in mind by the receiver of the complaint:

- Complaint are listened to and the complainant informed that the Company takes the concerns seriously. Complainant is informed that these concerns will be reported to the appropriate committee and follow up will be done speedily
- Situation are not be pre-judged. Written notes are taken while listening to the person. Complainant is allowed to bring another person to the meeting if they wish. When taking accurate notes, complainants own words, where possible, is used. Clear description of the incident in simple and direct terms is prepared and details are confirmed with the complainant.
- All notes are kept strictly confidential. Complainant's agreement is taken to allow proceeding with the matter, which involves a formal investigation.
- The complainant is advised that although the process is confidential, the respondent needs to be informed and any witnesses and persons directly involved in the complaint process will also learn of the complainant's identity.

Care is taken to prevent any disadvantage to or victimization of either the complainant or the respondent.

VII. Resolution procedure through conciliation:

Once the complaint is received, before initiating the inquiry the committee may take steps to

Conciliate the complaint between the complainant and the respondent. This is only if requested by the complainant.

It is made clear to all parties that conciliation in itself doesn't necessarily mean acceptance of complaint by the respondent. It is a practical mechanism through which issues are resolved or misunderstandings cleared.

In case a settlement is arrived at, the committee records & reports the same to the employer for taking appropriate action.

Resolution through conciliation happens within 2 weeks of receipt of complaint. The committee provides copies of the settlement to complainant & respondent. Once the action is implemented, no further inquiry is conducted.

VIII. Resolution procedure through formal inquiry

Conducting Inquiry- The committee initiates inquiry in the following cases:

- No conciliation is requested by the complainant;
- Conciliation has not resulted in any settlement;
- Complainant informs the committee that any term or condition of the settlement arrived through conciliation, has not been complied with by respondent;

The Committee proceeds to make an inquiry into the complaint within a period of 1 week of its receipt of the original complaint/closure of conciliation/repeat complaint.

IX. Manner of inquiry into complaint:

- Complainant should submit the complaint along with supporting documents and the names of the witnesses;
- Upon receipt of the complaint, the committee sends 1 copy of the complaint to respondent within 7 working days;
- Respondent replies with all supporting documents within 10 working days of receiving the copy of the complaint;
- No legal practitioner can represent any party at any stage of the inquiry procedure;
- The Complaints Committee makes inquiry into the complaint in accordance with the principles of natural justice;
- In conducting the inquiry, a minimum of three committee members including the Presiding Officer is present;

X. Interim relief:

During pendency of the inquiry, on a written request made by the complainant, the committee may recommend to the employer to –

- Transfer the complainant or the respondent to any other workplace
- Grant leave to the complainant of maximum 2 (two) months, in addition to the leave she/he would be otherwise entitled
- Prevent the respondent from assessing complainant's work performance
- Grant such other relief as may be appropriate.

Once the recommendations of interim relief are implemented, the employer will inform the committee regarding the same.

XI. Termination of Inquiry:

Committee of SHFL may terminate the inquiry or give ex-parte decision, if complainant or respondent respectively is absent for 3 consecutive hearings, without reason. 15 days written notice to be given to the party, before termination or ex-parte order.

XII. Inquiry procedure:

All proceedings of the inquiry are documented. The Committee interviews the respondent separately and impartially. Committee states exactly what the allegation is and who has made the allegation. The respondent is given full opportunity to respond and provide any evidence etc.

Detailed notes of the meetings are prepared which may be shared with the respondent and complainant upon request. Any witnesses produced by the respondent are also interviewed & statements are taken.

If the complainant or respondent desires to cross examine any witnesses, the Committee facilitates the same and records the statements.

In case complainant or respondent seeks to ask questions to the other party, they may give them to the Committee which asks them and records the statement of the other party.

Any such inquiry is completed, including the submission of the Inquiry Report, within 90 days from the date on which the inquiry is commenced. The inquiry procedure ensures absolute fairness to all parties.

XIII. Considerations while preparing inquiry report:

While preparing the findings/recommendations, following are considered:

- Whether the language used (written or spoken), visual material or physical behavior was of sexual or derogatory nature;
- Whether the allegations or events follow logically and reasonably from the evidence;
- Credibility of complainant, respondent, witnesses and evidence;
- Other similar facts, evidence, for e.g. if there have been any previous accounts of harassment pertaining to the respondent;
- Both parties have been given an opportunity of being heard;
- A copy of the proceedings was made available to both parties enabling them to make representation against the findings.

A copy of the final findings is shared with the complainant and the respondent to give them an opportunity to make a representation on the findings to the committee.

XIV. Action to be taken after inquiry:

Post the inquiry the committee submits its report containing the findings and recommendations to the employer, within 10 days of completion of the inquiry.

The findings and recommendations are reached from the facts established and is recorded accurately.

If the situation so requires, or upon request of the complainant, respondent or witness, Management of SHFL may decide to take interim measures such as transfer, changing of shift, grant of leave etc. to protect against victimization or distress during or subsequent to the course of inquiry, pending the final outcome.

XV. Complaint unsubstantiated:

Where the committee arrives at the conclusion that the allegation against the respondent has

not been proved, it recommends to the employer that no action is required to be taken in this matter. Further, the committee ensures that both parties understand that the matter has been fully investigated, that the matter is now concluded and neither will be disadvantaged within the company.

XVI. Complaint substantiated:

Where the committee arrives at the conclusion that the allegation against the respondent has been proved, it recommends to the employer to take necessary action for sexual harassment as misconduct, in accordance with the applicable service rules and policies, and this may include:

- i. Counseling
- ii. Censure or reprimand
- iii. Apology to be tendered by respondent
- iv. Written warning
- v. Withholding promotion and/or increments
- vi. Suspension
- vii. Termination
- viii. any other action that the Management may deem fit.

The employer of **SHFL** acts upon the recommendations within 60 days and confirm to the committee Post implementation of the actions, follow up with the complainant occurs to ascertain whether the behavior has in fact stopped, the solution is working satisfactorily and if no victimization of either party is occurring. This follow up is undertaken by the complainant's Line Manager supported by HR.

XVII. Malicious Allegations:

Where the committee arrives at the conclusion that the allegation against the respondent is malicious or the complainant or any other person making the complaint has made the complaint knowing it to be false or the complainant or any other person making the complaint has produced any forged or misleading document, it may recommend to the employer to take action against the complainant or the person making the complaint.

The action recommended should be similar to the ones proposed for the respondent in case of substantiated complaints. While deciding malicious intent, the committee should consider that mere inability to substantiate a complaint need not mean malicious intent. Malicious intent must be clearly established through a separate inquiry.

XVIII. Confidentiality:

The identity of the complainant, respondent, witnesses, statements and other evidence obtained in the course of inquiry process, recommendations of the committees, action taken by the employer is considered as confidential materials, and not published or made known to public or media.

Any person contravening the confidentiality clauses is subject to disciplinary action as prescribed in the act.

XIX. Appeal:

Any party not satisfied or further aggrieved by the implementation or non-implementation of recommendations made, may appeal to the appellate authority in accordance with the Act and rules, within 90 days of the recommendations being communicated.

ANNEXURE-A

Internal Complaints Committee at Head Office of SHFL

S NO.	NAME	DESIGNATION
1.	Mrs. Vandana Singla	Presiding Officer
2.	Mr. Anil Kumar Gupta	Member
3.	Ms. Yashoda Bisht	Member
4.	Mr. Narender Mittal	External member