

Subject: Internal Policy on Prevention of Sexual Harassment in the Workplace	Original Issue Date: 20.06.2014	Version No.: 2.0
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HOME FIRST FINANCE COMPANY INDIA LIMITED
(‘HomeFirst’)

**INTERNAL POLICY ON PREVENTION OF SEXUAL
HARASSMENT IN THE WORKPLACE**

A. INTRODUCTION

Home First Finance Company India Limited (the “**Company**”) is an equal employment opportunity company and is committed to creating a healthy work environment that enables employees to work without fear of prejudice, gender bias and sexual harassment. The Company also believes that all its employees have the right to be treated with dignity. Sexual harassment is therefore unacceptable and regarded as misconduct as per this policy. In order to deal with sexual harassment at the workplace and as required under ‘The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (the “**Act**”), this policy provides for protection against sexual harassment at the workplace, for the prevention and redressal of complaints of sexual harassment and to enforce strong disciplinary action in the event of any such incident.

This policy document details the relevant terms and definitions relating to sexual harassment in the workplace; the complaint and redressal mechanisms; and relevant guidelines for all employees.

B. POLICY OBJECTIVES

- To provide an appropriate policy document in compliance with the Act as well as in line with global policies and practices, which can be implemented effectively, monitored and communicated effectively to all employees.
- To promote gender equality and a safe, discrimination-free work environment for all employees.
- To encourage employees to understand their responsibilities and take an active role in preventing harassment.
- To provide a safe atmosphere for employees, who can depend upon the organization's support in resolving their concerns on sexual harassment at work regardless of position or status.

C. SCOPE AND EFFECTIVE DATE

- a) This Policy extends to all employees of the Company at all its locations and establishments; and is deemed to be incorporated in the service conditions of all employees and comes into effect immediately.
- b) The policy may be amended from time to time, based on changes in Company’s internal policies, or changes to the Act, or its rules, or applicable law. Please refer to our website on www.homefirstindia.com for the current version of this policy.

D. DESCRIPTION AND DEFINITION OF TERMS

- Sexual harassment includes any one or more of the following unwelcome acts or behavior (whether directly or by implication):
 - physical contact and advances; or
 - a demand or request for sexual favours; or
 - making sexually coloured remarks; or
 - showing pornography; or
 - any other unwelcome physical, verbal or non-verbal conduct of a sexual nature

The following circumstances, among other circumstances, if it occurs or is present in relation to or connected with any act or behaviour of sexual harassment may amount to sexual harassment –

- i. implied or explicit promise of preferential treatment in their employment; or
- ii. implied or explicit threat of detrimental treatment in their employment; or
- iii. implied or explicit threat about their present or future employment status; or
- iv. interferes with their work or creating an intimidating or offensive or hostile work environment for them; or
- v. Humiliating treatment likely to affect their health or safety.

For a further explanation of what kinds of acts constitute sexual harassment, please read the FAQ's.

“Employee” means a 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 knowledge of the principal employer, whether for remuneration or not, or working on a voluntary basis or otherwise, whether terms of employment are expressed or implied and includes a co-worker, a contract worker, probationer, trainee, apprentice or called by any other such name.

“Internal Complaints Committee (ICC)” means the committee constituted by the Company to investigate complaints of sexual harassment, in the manner prescribed under the law.

“Respondent” means a person against whom a complaint of sexual harassment as set out in this policy has been made.

“Workplace” includes any place visited by the Employee (as defined above) arising out of or during the course of the employment including transportation provided by the Company for undertaking such journey.

“Aggrieved woman” means, in relation to a workplace, a woman, of any age whether employed or not, who alleges to have been subjected to any act of sexual harassment by the respondent.

E. DETAILS OF THE INTERNAL COMPLAINTS COMMITTEE (ICC)

As mandated by the Act, the Company has constituted an ICC comprising of the following members:

Sr No.	Person	Location	Contact Details
1.	Ms. Vilasini Subramaniam (Chairperson)	Mumbai	Vilasini.subramaniam@homefirstindia.com
2.	Mr. Manoj Viswanathan	Mumbai	Manoj.viswanathan@homefirstindia.com
3.	Mr. Ajay Khetan	Mumbai	Ajay.khetan@homefirstindia.com
4.	Ms. Namrata Shah	Mumbai	Namrata.shah@homefirstindia.com
5.	Ms. Sahithya Adusumilli	Telangana	sahithya.adusumilli@homefirstindia.com
6.	Mr. Akshay Kunte	Gujarat	akshay.kunte@homefirstindia.com
7.	Ms. Gita Jaisinghani – External Member	Mumbai	Gita.jaisinghani@gmail.com

- a) The ICC shall be responsible for a fair and judicious enquiry into any complaint of sexual harassment in the workplace.
- b) A quorum of 3 members, including the Chairperson, is required to be present for the investigation proceedings to take place.
- c) The Board at its meeting held on November 18, 2019 had reconstituted the Committee. The tenure of the ICC members shall be 2 years from the date of re-constitution.

F. COMPLAINTS PROCESS

- a) Any employee who feels or is sexually harassed directly or indirectly may submit a complaint of the alleged incident to any member of the Committee in writing with their signature at the earliest, but not later than 90 days of occurrence of incident. The ICC may, at its discretion, extend that duration by an additional 90 days.
- b) The ICC will record the complaint received by it and keep the contents confidential as under the Act.
- c) The Complainant can also submit any corroborative material with documentary proof, if applicable, or a list of witnesses to the incident(s) to substantiate the complaint.
- d) As per the mandated process, the ICC will forward a copy of the original complaint to the respondent and provide an appropriate time (not exceeding 10 working days) for responding in writing to the allegations.
- e) The respondent may, if he / she chooses, attach documentary evidence and a list of witnesses to the incident(s), if applicable in his / her response.
- f) The ICC shall conduct a free and fair enquiry into the complaint following the principles of natural justice; and shall conclude its investigations in 90 days.

G. ENQUIRY PROCESS

- a) The Inquiry will be conducted confidentially as per the provisions of the Act, and upon the aggrieved woman's request, shall grant her relief during the pendency of the inquiry including but not limited to leave with full pay.
- b) The ICC shall interview the complainant, respondent and all relevant witnesses, if any, as part of its enquiry process. It shall complete the inquiry into the complaint within 90 days including all confidential interviews and examination of evidence. Within 10 days of completion of the inquiry, the ICC will submit its findings and recommendations to the Company's management.
- c) In case the complaint does not fall under the purview of Sexual Harassment it shall be concluded after recording the reasons thereof.
- d) In case the complaint is found to be false, the Complainant shall, if the complaint is found to be with malicious intent as per the inquiry in accordance with the procedure prescribed, be liable for appropriate disciplinary action by the management on the recommendation of the ICC.
- e) The management will direct appropriate action in accordance with the recommendations proposed by the Committee. Appropriate disciplinary action can include monetary compensation to the complainant, verbal or written reprimands, counseling, withholding of promotions or other benefits, or termination of employment.

H. RETALIATION

This policy recognizes retribution or retaliation in the context of reporting acts of sexual harassment as a serious violation. The report and investigation of allegations of retaliation will follow the procedures set forth in this Policy and will be treated as an additional complaint and investigated similarly. Any person found to have retaliated against an individual for reporting harassment, or for participating in an investigation of allegations of such conduct, may expect the Company to impose severe disciplinary action.

I. RESPONSIBILITIES

1. Employee responsibilities

The Company expects all its employees to comply with its policy and code of conduct towards creating a respectful and dignified work-environment for all. Employees must:

- Familiarize themselves completely with this policy as well as its contents.
- Co-operate with any measures introduced to promote equal opportunities.
- Make sure they understand and respect the sensitivities of co-workers and other people in the workplace.
- Refrain from discriminatory, offensive or disrespectful behavior, or any behavior which is in contradiction to the letter or the spirit of this policy.

- Make sure they extend support to any person who they suspect is being harassed in addition to reporting any such instance of sexual harassment to the appropriate person/s.
- Maintain confidentiality regarding any aspect of a complaint or an inquiry of which they may have information or may be included.

2. Manager responsibilities

As representatives of the Employer, the Company's managers are expected to present exemplary behavior, as well as play a strong supporting and guiding role for team members and others in adhering to this policy. Managers must

- Provide a safe place for their employees and team members and foster a discrimination-free environment.
- Communicate and provide support in understanding this policy.
- Handle any complaint that they receive with tact and maturity and take prompt action and communicate such issues to the appropriate person/s.
- Refrain from playing favorites, colluding, campaigning, gossiping or attempting to induce or pressure or otherwise interfere with such complaints or employees to influence an outcome.

Policy Implementation and review

The policy will be implemented and reviewed by the Board on need basis. The Company reserves the rights to amend, abrogate, modify, rescind, reinstate the entire policy or any part of it at any time.

ADDENDUM

FAQs

1. *What is considered sexual harassment?*

Sexual harassment can include (but is not limited to) any one or more of the following unwelcome acts or behaviour (whether directly or by implication), such as -

- An unwelcome act of inappropriate physical intimacy, like grabbing, brushing, touching etc.
- An unwelcome remark with sexual connotations, like sexually explicit comments or compliments / jokes with sexual connotations/ making sexist remarks etc.
- Sharing of any sexually explicit visual material, in the form of pictures / cartoons / screen savers on computers /any offensive written material or sms's /pornographic e-mails, etc.
- Engaging in any other unwelcome conduct of a sexual nature, which could be verbal, or even non-verbal, like staring to make the other person uncomfortable, making offensive gestures, kissing sounds, etc.
- Making an unwelcome demand or request (whether directly or by implication) for sexual favors from another person
- A superior requesting or implying a request for sexual favors from a junior in return for advancement or benefits or negative threats whether direct or implied
- A person in power making intrusive inquiries or references about the private lives of employees, or persistently asking them out
- A group of workers joking about sexual conduct (even amongst themselves) in an attempt to humiliate or embarrass another person
- Acts or conduct by a person in authority that renders the environment at workplace hostile or intimidating to a person belonging to the other sex

Please remember that in cases of sexual harassment, the intent of the perpetrator is irrelevant; and it is the impact on the aggrieved person that is considered pertinent.

2. What should I do if I think I am being sexually harassed?

Please let an ICC member know right away. Unfortunately, ignoring sexual harassment does not make it go away. Please read the policy on PSHW and make a written complaint of the behavior.

3. What should I do if I feel I have been discriminated against or harassed, but I don't think it is sexual harassment?

Please let your supervisor or a Management Committee member know right away. The Company prohibits discrimination or harassment on the basis of race, color, religion, sex, sexual orientation, gender identity, gender expression, marital status, age, disability, nationality or background.

4. I'm being harassed by someone who is not an employee, but who visits the Company to conduct business. Is there anything I can do?

Yes, you can report the issue as Sexual Harassment. The policy applies to the extended workplace, as well as situations involving an external stakeholder.

5. I think I was witness to something which may be Sexual Harassment, but it is not directed at me. What should I do?

Anyone who witnesses inappropriate comments or conduct, even if it is directed at someone else, can still feel uncomfortable and harassed. If you witness conduct that you believe might be sexual harassment and

are not sure, please contact your supervisor or a Management Committee or ICC member who can guide you.

6. Will my complaint be treated confidentially?

The Company will make every practicable effort to handle inquiries, complaints and related proceedings in a manner that protects the privacy of all parties. Each situation is resolved as discreetly as possible, with information shared only with those who need to know in order to investigate and resolve the matter. The organization will be sensitive to the feelings and situation of the alleged victim and anyone who reports sexual harassment. However, the organization will need to address the issue and try and get as much information as possible while keeping the information confidential. All employees are also constrained to follow confidentiality to the maximum possible extent.

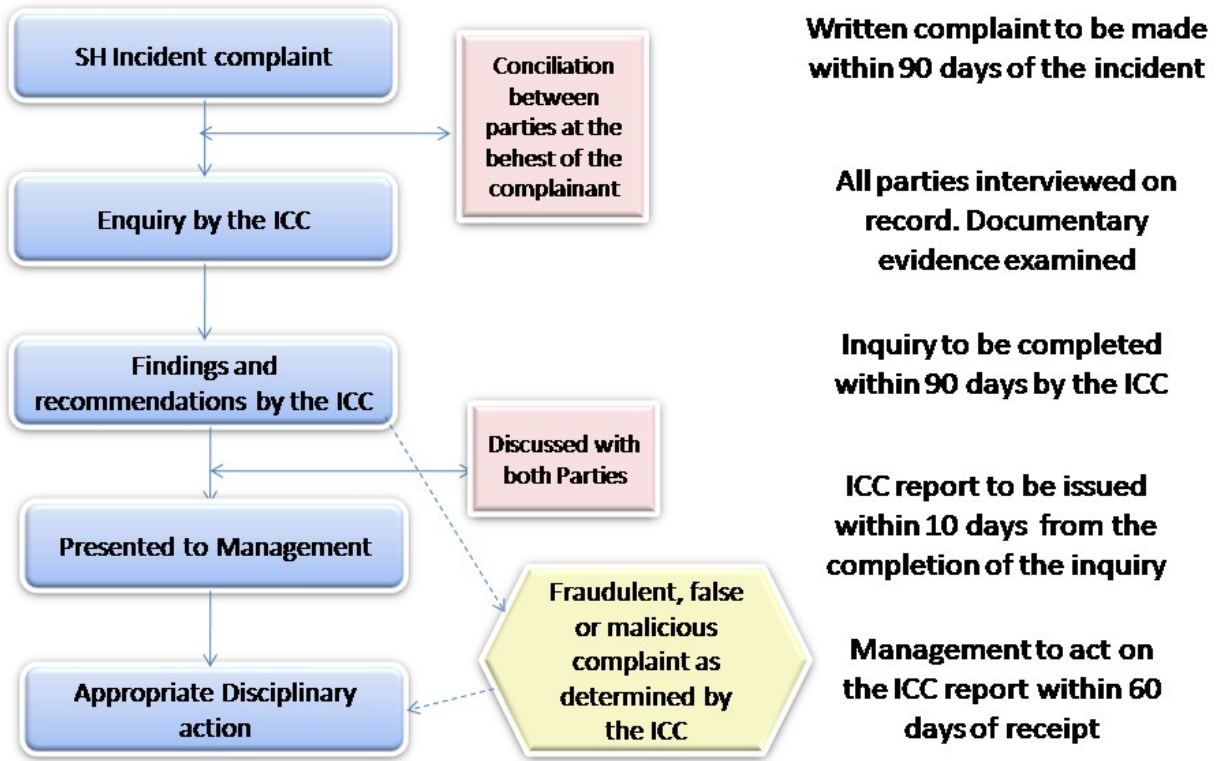
7. How will a false allegation of sexual harassment be handled?

When someone intentionally reports information or incidents that they know to be untrue, or lies to make a claim, or makes a malicious complaint, or provides false or forged documents during a complaint or an inquiry; it is considered a fraudulent claim. Disciplinary action may be imposed on individuals who make false allegations of sexual harassment upon enquiry of the same. Failure to prove a claim of harassment is not equivalent to a false allegation.

What else can I do?

- Feel empowered to set your own boundaries. Say "NO" emphatically and clearly when you are asked to do things, go places, respond to questions, or engage in situations that make you uncomfortable. Do not worry about offending the other person or damaging relationships. Take care of yourself first and ensure you communicate directly and clearly if you are uncomfortable with any inappropriate behavior.
- Be aware of situations and people around you. Don't ignore other's warnings about particular people or locations or social settings.
- Trust your own instincts about possible danger. In an uncomfortable situation remove yourself from the situation immediately. Regardless of your previous behavior or signals, you have the absolute right to halt any inappropriate or unwelcome exchange at any time.

THE REDRESSAL PROCESS – EXPLAINED



ANNEXURE

ICC GUIDELINES

All ICC members must consider the prevention of sexual harassment in the workplace as their responsibility and obligation; and must proactively initiate measures to achieve the same, including communicating to employees, and sensitizing and educating them through periodic trainings. In addition, they must

- a) Familiarize themselves with the details of the Act, and its rules; and any other amendments or notifications that may be made.
- b) meet regularly to update themselves on and review the details of any complaints that may have been made, and inquiries conducted
- c) Be responsible for submitting an annual report on all complaints of this nature to both the Management Committee as well the District Officer, in the manner prescribed.
- d) keep in mind the covert and insidious nature of sexual harassment, and stay sensitive to the practical and societal difficulties in reporting such acts
- e) be sensitive to the difficulties in providing direct or corroborative evidence of such incidents

Further, while conducting an investigation, ICC members shall follow their own code of conduct:

1. Shall be cognizant of the implicit and explicit power equations between all parties, including organizational hierarchy and influence as well as the relative socio-economic differences, while evaluating testimonies and evidence.
2. Shall not conduct any enquiry or allow any evidence about the complainant's personality, character, personal life, general behavior or personal and sexual history.
3. Shall guard against any bias in their own perception or investigation.
4. Shall keep both parties reasonably informed at their discretion about the status of the complaint and enquiry.
5. Shall stay impartial to both parties, and follow the principles of natural justice in its enquiries
6. Shall evaluate all testimonies and evidence applying a balance of probabilities.

ANNEXURE

EMPLOYER GUIDELINES

The Company is committed to providing a safe and respectful working environment and a harassment-free atmosphere. By means of this policy and other measures, it shall:

1. Ensure the communication of this policy, and any other relevant information, to all its employees.
2. Organize workshops and training programmes at regular intervals for sensitizing the employees regarding the provisions of the policy.
3. Provide necessary facilities to the ICC for dealing with complaints and conducting inquiries.
4. Assist in securing the attendance of respondent and witnesses before the ICC and make available any information the ICC may require in conducting its enquiry.
5. Provide assistance to the aggrieved person if they choose to file a complaint in relation to the offence under the Indian Penal Code
6. Where sexual harassment occurs as a result of an act or omission by any third party or outsider, the Company shall take all steps necessary and reasonable to assist the affected person in terms of support and preventive action.
7. In case the degree of offence is deemed coverable under the Indian Penal Code, then appropriate action shall be initiated by the Management, for making a Police Complaint.
8. Encourage all its vendors and other relationships to be compliant with the Act and communicate the Company's commitment to a harassment-free workplace both officially and informally to all its vendors.
9. To take such actions based on the findings and recommendations of the Internal Complaints Committee (ICC) as per the Act.
10. Proper protection against retaliation to complainants, witnesses, committee members and other employees involved in prevention and complaint resolution.