SAGARMALA FINANCE CORPORATION LIMITED

POLICY ON PREVENTION OF SEXUAL HARASSMENT OF WOMEN (POSH)

1. **OBJECTIVE**: To create and maintain safe work environment, free form sexual harassment & discrimination for all its employees. These policy guidelines will be subordinate to the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act 2013. The policy aims at ensuring that all employees maintain appropriate standards of business and personal conduct with colleagues, clients and with the public at large.

2. **APPLICABLITY:** The Policy intends to ensure that no women employee is subjected to Sexual Harassment and itis applicable to all employees of SMFCL. SMFCL aims to adopt zero tolerance attitudes against any kind of Sexual Harassment or discrimination caused by any employee during their tenure in SMFCL.

3. **DEFINITION OF SEXUAL HARASSMENT UNDER SECTION 2 (N) OF THE ACT**

Sexual Harassment is any unwelcome sexually behavior or pattern of conduct, that would cause discomfort and/or humiliate a person at whom the behavior was directed.

A. The behavior includes but are not limited to the following:

(i) Unwelcome sexual advances including verbal, non-verbal and physical conduct (explicit or implicit).
(ii) Physical contact and advances including touching, stalking, molestation, etc.
(iii) Demand or request for sexual favors (during or after office hours).
(iv) Sexually colored remarks or sexual remarks about a person's body or clothing.
(v) Unwelcome hand gestures and eve-teasing.
(vi) Showing pornography and participation in indecent/sexual messages through anymedium.
(vii) Preferential treatment meted out to employees on sexual grounds.
(viii) Any other unwelcome physical, verbal, or non-verbal conduct of sexual nature.

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

(i) implied or explicit promise of preferential treatment in her employment; or
(ii) implied or explicit threat of detrimental treatment in her employment; or
(iii) implied or explicit threat about her present or future employment status; or
(iv) interference with her work or creating an intimidating or offensive or hostile work environment for her; or
(v) humiliating treatment likely to affect her health or safety.

4. GRIEVANCE MECHANISM: PROCEDURE TO REGISTER COMPLAINTS:

A complaint shall be submitted through email or can be discussed during the meeting with 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 complainant, or person influencing the career growth of the complainant, the reporting structure will be changed till the time the enquiry is completed.

5. COMPLAINT PROCEDURE. Each complaint of Sexual Harassment shall be dealt with utmost confidentiality and urgency by an Internal committee consisting of:

- Presiding Officer who is a woman employed at a senior level in the workplace.
- Two other members, from amongst employees committed to this cause with extensivelegal prowess.
- One external member (from an NGO or likewise) familiar with the issues of sexual harassment.

6. THE RESOLUTION PROCESS

(i) The ICC shall investigate all complaints thoroughly and promptly, in a free and fair manner.
(ii) Investigation may include private interviews or a formal inquiry process.
(iii) A complaint can be resolved through conciliation only if the aggrieved employee approves of the same.
(iv) The ICC shall communicate the course of action to be taken to the employer. If no substantial action is arrived at, the same is communicated as well.
(v) The courses of action may include Counselling, Warnings or Reprimand, Tendering of apology, Withholding of promotions/ increments, Suspension, Termination etc.
(vi) The Employer should present the course of action within 30 days and the same should be intimated to the ICC.

7. LEGAL COMPLIANCE

The ICC shall in each calendar year prepare, in such format as may be prescribed, an annual report and submit the same to the employer. The report shall have the following details:

(i) Number of complaints of Sexual harassment received in the year
(ii) Number of complaints disposed of during the year
(iii) Number of cases pending for more than 90 days
(iv) Number of workshops or awareness program against Sexual Harassment carried out
(v) Nature of action taken by the employer.

8. AWARENESS

Awareness sessions are to be organized to formulate and widely disseminate an internal policy or charter or resolution or declaration for prohibition, prevention and redressal of sexual harassment at the workplace intended to promote gender sensitive safe spaces and remove underlying factors that contribute towards a hostile work environment against women.