



ANTI-SEXUAL HARASSMENT POLICY

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1. INTRODUCTION

Sexual harassment results in the violation of the fundamental rights of a woman. The protection against sexual harassment and her right to work with dignity are universally recognized human rights by international conventions. In view of the above, the Company has framed its Anti Sexual Harassment Policy for protection of women against sexual harassment at workplace.

2. THE POLICY STATEMENT

ANSON FINCORP PRIVATE LIMITED is committed to providing a safe environment for all its employees free from discrimination on any ground and from harassment at work including sexual harassment. The Company will operate a zero tolerance policy for any form of sexual harassment in the workplace, treat all incidents seriously and promptly investigate all allegations of sexual harassment. Any person found to have sexually harassed another will face disciplinary action, up to and including dismissal from employment. All complaints of sexual harassment will be taken seriously and treated with respect and in confidence. No one will be victimized for making such a complaint.

3. COMPANY'S POLICY ON WORKPLACE STANDARDS

1. The Company shall not tolerate any form of sexual harassment of its employees. All employees are expected to maintain the decorum /in the office premises that is conducive to all employees working in a dignified manner thereby contributing and achieve the Company's goals and objectives.
2. The employees shall refrain from any acts of sexual harassment of other employees. Any form of threatening or insinuation, either explicitly or implicitly with sexual overtones or advances
3. Any employee, who believes that the other employee's actions or words constitute sexual harassment, has a responsibility to assist the concerned employee to report or complain about the situation either immediately or as soon as possible.
4. The Company prohibits any form of retaliation against any such employee, for bringing bona-fide complaint or providing information about any such incident. However, any complaint of sexual harassment other than the affected employee shall not be entertained.
5. Where such conduct, in the workplace or during the course of employment, apart from coming under purview of the sexual harassment policy of the Company, it also comes under specific offence under the Indian Laws the Company shall initiate appropriate action in accordance with the law and provide all support to any person who is a victim of such conduct.

4. SCOPE AND EFFECTIVE DATE

This Policy is applicable to all women employees of the Company. This is also applicable to women who are on deputation in the Company or who are on contract in the Company. It shall come into force with effect from the date of adoption by the Board of Directors.

5. DEFINITIONS:

5.1 Aggrieved associate:

1. In relation to the work place a woman of any age whether employed or not who alleges to have been subjected to any act of sexual harassment by the respondent.
2. In relation to dwelling place or house, a woman of any age who is employed in such dwelling place or house.

5.2 Domestic worker:

a women who is employed to do household work in any household for a remuneration whether in cash or in kind either directly or through any agency on a temporary, permanent , part time or full time basis but does not include any member of the family of the employer.

5.3 Employer:

1. In relation to any department , organization , undertaking , establishment, enterprise, institution, office , branch or unit of the appropriate Government or a local authority, the head of that department, organization, undertaking, establishment, enterprise, institution, office, branch, or unit or such other officer, as the appropriate Government or the local authority may be by an order specify in this behalf.
2. In any workplace not covered under the above, any person is responsible for the management supervision and control of the workplace.
3. In relation to workplace covered under sub clauses (i) and (ii), the person discharging the contractual obligations with respect to his or her employees.
4. In relation to dwelling place or a house , a person or household who employs or benefits from the employment of domestic workers irrespective of the number , time period or type of such worker employed or the nature of the employment or activities performed by the domestic worker

5.4 Respondent

“Respondent” means the person against whom the Complainant has made a complaint.

5.5 Sexual Harassment

Sexual harassment is unwelcome conduct of a sexual nature which makes a person feel offended, humiliated and/or intimidated. It includes situations where a person is asked to engage in sexual activity as a condition of that person’s employment, as well as

situations which create an environment which is hostile, intimidating or humiliating for the recipient.

Sexual harassment can involve one or more incidents and actions constituting harassment may be physical, verbal and non-verbal. Examples of conduct or behavior which constitute sexual harassment include, but are not limited to:

Physical conduct

- Unwelcome physical contact including patting, pinching, stroking, kissing, hugging, fondling, or inappropriate touching
- Physical violence, including sexual assault
- Physical contact, e.g. touching, pinching
- The use of job-related threats or rewards to solicit sexual favours

Verbal conduct

- Comments on a worker's appearance, age, private life, etc.
- Sexual comments, stories and jokes
- Sexual advances
- Repeated and unwanted social invitations for dates or physical intimacy
- Insults based on the sex of the worker
- Condescending or paternalistic remarks
- Sending sexually explicit messages (by phone or by email)

Non-verbal conduct

- Display of sexually explicit or suggestive material
- Sexually-suggestive gestures
- Whistling
- Leering

6. OBJECTIVE

The major initiative of the Company is

- ❖ To spread awareness to employees on the process available to safeguard and protect employees on the sexual harassment of employees in the workplace.
- ❖ To frame a standard guideline on the process for effective redressal of complaints of employees.
- ❖ To ensure that standard guidelines are given to appropriate authorities to deal with such complaints, thereby provide safe and conducive workplace for all employees.
- ❖ To prevent any incident of sexual harassment of employees at the workplace.
- ❖ To set guidelines for acceptable & expected behavior of its employees at workplace.

It's the Company's endeavor to promote a safe, secure and productive working environment that emphasizes collective workforce and conducive workplace free from harassment & empowers the employees especially the women employees to work with dignity and without any inhibition.

The Company shall not allow or tolerate any such acts or conduct by any of its employees resulting in sexual harassment any employee and shall ensure the safety and security of its employees.

7. INTERNAL COMPLAINT COMMITTEE

A complaint committee is formed to investigate the complaints of Sexual Harassment. The committee will constitute of the under mentioned members:

Mrs. Animol C S	:	Presiding Officer (Employee)
Mr. Arun A J	:	Member (Employee)
Mrs. Amala Varghese	:	Member (Employee)
Mrs. Nimisha Rajendran	:	Member (External Member)

8. WHO CAN COMPLAIN?

Complaints can be made by

- ✓ any aggrieved associates, including any person on deputation or on contract working in the premises of the Company who is affected by any form of sexual harassment to them during their working in the premises of the Company.
- ✓ Any legal heir of the aggrieved person may make a complaint.
- ✓ Against any person/persons, who is/are alleged to have committed an act of sexual harassment. No third-party complaints will be entertained.

9. Complaints procedures

9.1 Filing of complaint

- Employees who believe they have experienced or observed sexual harassment should report their complaint immediately to below mentioned email id. All complaints shall be promptly handled on a confidential basis and appropriate action shall be initiated.
- Complaint can be made by email to: posh@anson.co.in or can be directly made to the HR department.
- The Committee member on receiving a complaint will intimate the presiding officer. The presiding officer would arrange for a meeting within one week of receipt of the complaint to discuss the complaint raised.

- Complaint must be brought within 3 months of the incident of sexual harassment and within 3 months of the incident of sexual harassment and within 180 calendar days for Ex-associates of the Company.
- Complaints brought after that time will not be pursued absent extraordinary circumstances. The determination of whether the complaint was timely or whether extraordinary circumstances exist to extend the complaint must be made in conjunction with the committee.
- Every attempt will be made to get the complainant to provide the complaint in writing. The complaint shall include the circumstances giving rise to the complaint, the dates of the alleged occurrences, and name of witness if any. The complaint shall be signed by the Complainant.
- Complaints made anonymously or by a third party must also be investigated to the extent possible.
- Where the aggrieved associate is unable to make complaint on her physical or mental incapacity or death or otherwise, her legal heir or such other person as may be prescribed may make a complaint within 3 months of the incident.
- If the complaint does not rise to the level of sexual harassment, the committee may determine to dismiss the complaint without further investigation.

9.2 Process of enquiry

- The Committee may ask the complainant to prepare a statement of incidents/allegations. The statement of allegations will be shared with the accused.
- The accused will be asked to prepare a response to the statement of allegations and submit to the committee within the given time.
- The statements and other evidence obtained in the enquiry process will be considered confidential.
- The Committee will make a preliminary investigation based on the statements and other evidences available.
- After the investigation the committee will organize verbal hearings with the complainant and the accused.
- The Committee will take testimonies of other relevant persons and review the evidence wherever necessary. The committee should ensure that sufficient care is taken to avoid any retaliation against the witness.
- During the inquiry process, the complainant and the accused would be expected to refrain from any form of threat, intimidation or influencing of witnesses.
- The committee will conduct inquiry in accordance with the practices of natural justice.
- The committee will arrive at a decision after carefully and fairly reviewing the circumstances, evidence and relevant statements.
- The committee will ensure confidentiality during the enquiry process and will ensure that in the course of investigation.
- The committee after the hearing will scrutinize evidences and shall make its on final investigation

on the facts.

- The Committee will be empowered with such powers to do all things to ensure fair disposal of the complaint including all things necessary to ensure that victims or witnesses are neither victimized nor discriminated against while dealing with a complaint of sexual harassment. In this regard the committee will also have the discretion to make appropriate interim recommendations in relation to an accused person (pending the outcome of a complaint) including suspension, transfer, leave, change or work location etc.
- The investigation into a complaint will be conducted in such a way as to maintain confidentiality to the extent practicable under the circumstances.
- The Committee will investigate and prepare an enquiry report with recommendations within 4 weeks from the date of complaint.

9.3 Decision and action

Once the investigation is completed, a determination will be made regarding the validity of the harassment allegations. If it is determined that the harassment has occurred, prompt, remedial action will be taken. The committee will share the investigation details and the findings thereof with the appropriate HR head and agree on the applicable disciplinary action. This may include some or all of the following:

- ❖ Restore any lost terms, conditions or benefits of employment to the complainant.
- ❖ Discipline the accused. This discipline can include demotion, suspension and termination.

The disciplinary action will be carried out by the HR department. Such disciplinary action may even include transfer, demotion or termination. All related documents will be maintained by the HR, ensuring confidentiality.

This anti-sexual harassment policy shall not, however, be used to raise malicious complaints. If a complaint has been made in bad faith, as demonstrated by clear and convincing evidence, disciplinary action which may include demotion, suspension or termination will be taken against the person raising the complaint.

As per the provisions of “The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act 2013” “the employer shall include in its report the number of cases filed, if any and their disposal under this act in the annual report of the Company or where no such report is required to be prepared, intimate such number of cases, if any, to the district officer.”

10. Policy implementation and review

The policy will be implemented and reviewed by the HR department. The Company reserves the right to amend, abrogate, modify, rescind/reinstate the entire policy or any part of it any time.

11. Informal complaints mechanism

If the accused or complainant wishes to deal with the matter informally and on mutual consent of both accused and complainant, the designated person (HR or his/her representative) will:

- give an opportunity to the alleged harasser to respond to the complaint.
- ensure that the alleged harasser understands the complaints mechanism.
- facilitate discussion between both parties to achieve an informal resolution which is acceptable to the complainant or refer the matter to a designated mediator (presiding officer / committee members) within the company to resolve the matter.
- ensure that a confidential record is kept of what happens.
- follow up after the outcome of the complaints mechanism to ensure that the behavior has stopped.
- ensure that the above is done speedily and within 21 (Twenty-One) days of the complaint being made.

12. Outside complaints mechanisms

A person who has been subject to sexual harassment can also make a complaint outside of the company only if the case has not been settled by the Company under this policy.

13. Annexure-1: Responsibility of Associates

The below is only an indicative list of basic Do's and Don'ts and is in no way intended to be construed as an exhaustive list.

Do's

- ❖ Know Company's Anti-Sexual Harassment Policy
- ❖ Be aware of inappropriate behaviors and avoid the same.
- ❖ Say "No" if asked to go places, do things or participate in situations that makes you uncomfortable.
- ❖ Trust your instincts. Walk away from uncomfortable situations
- ❖ Say "NO" to offensive behavior as soon as it occurs.
- ❖ Refrain from taking discriminatory actions or decisions which are contrary to the spirit of this policy.
- ❖ Maintain confidentiality regarding any aspect of an inquiry to which they may be party to.

Don'ts

Verbal Harassment

- ❖ Sexually suggestive comments or comments on physical attributes.
- ❖ Offensive language that insults or demeans a colleague, using terms of endearment.
- ❖ Singing or humming vulgar songs.
- ❖ Requests for sexual favors, sexual advances, coerced act of a sexual nature.
- ❖ Requests for dates or repeated pressure for social contact.
- ❖ Discussing sexual activities, sexual prowess or intruding on the privacy of an associate.
- ❖ Sexually colored propositions, insults or threats.
- ❖ Graffiti in the office premises.

Nonverbal harassment

- ❖ Offensive gestures, staring, leering or whistling with the intention to discomfort another.
- ❖ Even if not directly done to a particular individual, uttering a word, making a gesture or exhibiting any object with the intention that such word, gesture, or object be heard or seen by associates.
- ❖ Sounds, gestures, display of offensive books, pictures, cartoons, magazines, calendars or derogatory written materials at one's workplace.
- ❖ Showing or mailing pornographic posters, internet sites, cartoons, drawings.
- ❖ Suggestive letters, phone calls, SMS, electronic instant messaging or e-mail messages.

Physical Harassment

- ❖ Physical contact or advances
- ❖ Intentional touching of the body, e.g: Hugs, Kisses, brushing, fondling, pinching etc. that makes others uncomfortable.
- ❖ Any displays of an affection that makes others uncomfortable or are inappropriate at the workplace.

14. Annexure-2: Guidelines for redressal committee

Role of committee

- ❖ Review the complainant's complaints in a fair and objective manner.
- ❖ Help the complainant and the accused to find a way of solving the problem.
- ❖ Determine the facts of the case with the individuals concerned and the witnesses, if any, and prepare a report with the findings.
- ❖ Be bound in the principle of natural justice and be unbiased in their evaluation.

Conciliation

- ❖ The committee before initialing an enquiry, at the request of the complainant should take steps to settle the matter between the complainant and accused through conciliation provided that no monetary settlement shall be made as a basis of conciliation.
- ❖ Where a settlement has been arrived the committee shall record the settlement so arrived and forward the same to HR to take actions as specified in the recommendation.
- ❖ The committee shall provide the copies of settlement as recorded to the complainant and the accused.
- ❖ Where a settlement is arrived no further inquiry shall be conducted by the committee.

General Instructions

- ❖ Any information relating to conciliation and inquiry proceedings, and recommendations of the committee and the action taken shall not be published, communicated or made known to the public, press/media in any manner.
- ❖ Where any person entrusted with the duty to handle or deal with the complainant, inquiry or any recommendations or actions to be taken, contravenes, he/she shall be liable for disciplinary actions.