



Shubham Housing Development Finance Company Limited

ANTI SEXUAL HARASSMENT POLICY

Version control				
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ANTI SEXUAL HARASSMENT POLICY

1. Purpose

Shubham Housing Development Finance Company Limited (henceforth referred to as the "Company") is committed to providing a safe environment conducive to the growth and development of its all employees, customers and vendors, suppliers and contractors (collectively called third party). Given this commitment, the Company strives to address sexual harassment and violence to ensure wellbeing of its employees and third parties. The Company is dedicated to ensure enactment, observance and adherence to guidelines and best practices that prevent and prosecute commission of acts of sexual harassment and violence. Hence, this anti sexual Harassment policy is being implemented (Policy)

The Policy is applicable for all acts of sexual harassment and violence alleged to have taken place by individuals within or outside the Company premises where the Company conducts its business.

Any act of violation of this policy, by employees or third party or customer interacting with the Company, will lead to appropriate remedial measures under the circumstances, including mitigation against the potential for repetition and to discipline any of its employees who may have participated in such conduct, or may have failed to stop such conduct when having the authority to do so.

The objective of this policy is to provide the definition, framework and modus operandi for addressing all allegations of sexual harassment and violence made by any women employee or by any third party or customer and enable the implementation of provisions of Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 as modified from time to time ("the Act").

2. Applicability

To protect all women whether working on the rolls of the Company or third party and women customers.

3. Definitions and examples of sexual harassment and violence

Sexual harassment and violence includes, but will not be confined to the following:

- Creation of a hostile work environment through unwelcome sexual advances such as
 - Physical contact or molestation
 - Stalking
 - Requests for sexual favours, verbal or physical conduct of a sexual nature, either explicitly or implicitly, in return for a team or condition of instruction, employment, participation or evaluation of a person's engagement in any Company activity.

- Sexually coloured remarks or jokes, letters, phone calls or e-mails, gestures, showing of pornography or other visual displays of degrading sexual images, lurid stares
- Sounds of a derogatory nature
- Sexual harassment by one in position of power or influence constituting quid pro quo when submission by an individual is made either in explicit or implicit terms or condition of employment or submission to or rejection of such conduct is used as the basis for employment decisions affecting that woman employee such as promotion and pay rise.
- Sexual violence means unacceptable behaviour and practices or threats thereof, which cause or likely to cause physical harm

Please note:

- The definition of sexual harassment and violence will also apply to any member of a third party or customer in relation to a woman employee of the Company or vice versa on the premises of Company.
- Any of the acts mentioned above, committed in circumstances wherein the victim of such conduct has a reasonable apprehension that in relation to the victim's employment or work, such conduct can be humiliating or may constitute to a health and safety problem, the same will tantamount to sexual harassment and violence.

4. Obligations of the Company

The Company shall be responsible, among others, for the following:

- (i) To prohibit, prevent and deter commission of acts of sexual harassment and violence;
- (ii) To implement the Policy in strict alignment, thus creating a favorable environment.
- (iii) To implement transparent recruitment and performance assessment systems to reduce opportunities for sexual harassment such as
 - To inform candidates appearing for job interviews that Company is committed to addressing sexual harassment in all of its operations.
 - To make candidates aware of the behaviour expected from interviewers and how to report any behaviour they may find inappropriate or worrying
 - To provide all new recruits with training or induction sessions on relevant anti sexual harassment policies, codes of conduct and grievance mechanisms
 - To reduce opportunities for sexual exploitation in bonus or other employee reward schemes.
 - To use objective and transparent productivity metrics help to ensure bonuses are not used as an opportunity for exploitation and abuse
 - To hold exit interviews
- (iv) To have diverse leadership teams (in terms of gender, race, sexual orientation, gender identity and other characteristics)
- (v) To spread awareness of the Policy amongst its employees by providing easy access to the

- policy through publication, notification and circulation of the same
- (vi) To work with contractors, vendors and suppliers to prevent sexual harassment, such as, requesting them to share anti-sexual harassment policies and procedures where present and a requirement to adhere to the Company's anti sexual harassment policies and procedures where these are not in place
 - (vii) To design physical spaces, to the extent possible, to increase safety and reduce opportunities for sexual harassment and violence such as
 - To install security equipment (such as CCTV cameras)
 - To have well-maintained lighting in and around access routes
 - To have separate, lockable and well-lit toilets
 - providing safe transport to and from workplaces
 - (viii) Conduct training of Committee or sub-Committee members on Gender Based Violence and Harassment (GBVH) Guidelines.
 - (ix) Sensitizing employees about sexual harassment issues
 - (x) Provide fair and impartial procedures for resolution, settlement or prosecution of acts of sexual harassment by taking all necessary steps
 - (xi) Implementation of recommendations of the Anti-Sexual Harassment Committee.

It will be the responsibility of the Human Resource function to get an understanding of the issues raised and counsel the Complainant as well as the accused and make them aware of all implications of filing/ not filing a complaint formally.

In a scenario, wherein the Company / Committee becomes aware of commission of an act(s) of sexual harassment, the Company shall have the right to initiate suo moto action, even in the absence of a formal complaint being submitted by aggrieved women employee.

5. Anti-Sexual Harassment Committee ("Committee")

The Committee has been constituted by the Board to address all cases/complaints of alleged sexual harassment submitted by the aggrieved women employee(s) or take action suo moto to prevent sexual harassment within the outlined framework. The Company has further set up sub-committees, details whereof is set out in **Annexure A** to this policy and may set up further such sub-committees as may be deemed fit from time to time. Provided however that Committee shall have power to direct the transfer of any matter/case from one sub-committee to another or to the Committee itself.

5.1 Composition

The Committee consists of the following:

- Chairperson – (Head of Credit & Service)
- Member – (ZCM)

- Member – (Head - Learning & Development)
- Member – (External Member-NGO worker)

The Committee will meet as and when required.

The quorum requirement for convening a Committee meeting is 3 members. It is mandatory that at least half of the members of the Committee are women and the Committee is led by a women member. Tenure of members and chairperson of Committee shall not exceed 3 years.

5.2 Disqualifications

A person shall be disqualified for being appointed, elected nominated, designated for continuing, as a member of the Committee, if:-

- (a) He has been found guilty in any disciplinary proceedings (*including proceedings involving complaint of sexual harassment*) or a disciplinary proceeding is pending against him; or
- (b) Has been convicted for an offence or an inquiry into an offence under any law for the time being in force is pending against him; or
- (c) Has so abused his position as to render his continuance in office prejudicial to the public interest; or
- (d) Contravenes the provisions of Section 16 of the Act

6. Confidentiality

It is the obligation of the Committee that all complaints of sexual harassment/violence are treated and processed with utmost confidentiality, in alignment with the process outlined for required investigation and implementing corrective actions.

7. Submission of a complaint

Any aggrieved woman covered under Section 2 of the Policy will have a right to lodge a complaint concerning sexual harassment/violence against an employee of Company or of third party or customer interacting with the aggrieved woman (henceforth referred to as "Complainant") with the Committee either in person or through an email to "employee.complaints@shubham.co", within a period of 3 months from the date of incident and in case of a series of incidents, within a period of 3 months from the date of last incident, in the manner as outlined below:

- A Complainant will be provided full confidentiality.
- In case complaint is made against a person who is member of the Committee, such person should excuse from the conduct of the committee for such complaint.
- Upon receipt of complaints including anonymous complaints, the Committee shall forthwith

convene a meeting of which advance written intimation will be given to the Complainant.

- The Complainant will be entitled to remain present personally during the meeting.

Provided that Anti-sexual harassment committee may, for the reasons to be recorded in writing, extend the time limit, not exceeding three months, if it is satisfied that the circumstances were such which prevented the woman from filing a complaint within the said period.

During the first meeting of the Committee, the Complainant shall be heard and the Committee shall decide whether the Complaint requires to be proceeded with. The Complaint will be dropped only if the Complainant will not able to substantiate an offence of sexual harassment/violence.

In case the Committee decides to proceed with the Complaint, the Complainant's concerns with respect to the issue shall be taken into account and if the Complainant so wishes, the Accused (henceforth referred to as "Accused") will be called to a meeting of the Committee, be heard and if necessary, warned about his / her behaviour and the matter concluded with a recording to that effect made by the Committee. However, if the Complainant wishes to proceed with the Complaint beyond a mere warning to the Accused, the same will be proceeded with in the manner prescribed in this policy under the 'proceedings' section.

8. Proceedings of the Committee

The following is the redressal process, which will be adopted by the Committee to address any complaints lodged by an aggrieved women employee:

- The Committee will prepare the statement of allegation and will share the same with the Accused.
- If the Accused desires to tender any written explanation to the statement of allegation, he/she shall submit the same to the Committee.
- The Committee will give ample opportunity to the Complainant and the Accused, for putting forward and defending their respective case by presenting witnesses and evidence, which may establish their claims.
- The Complainant and the Accused will have the right to submit supporting evidence.
- The Committee will complete the enquiry / investigation within a period not exceeding ninety (90) days and prepare a report of its findings on the charges against the Accused and its decision to the Chief Executive Officer/Chief Operating Officer and any other persons as nominated by them (henceforth referred to as the "Management") within a reasonable period from the date of filing of the Complaint by the Complainant. Committee shall share the report with the management within 10 days from the date of completion of the inquiry. The report of the Committee will also include recommendations to the Management for imposition of penalty along with reasons for such recommendations, as applicable.

Committee shall at least once in a year place the minutes of its proceedings before Board for its review.

9. Implementation of Recommendations of the Committee

The Management will consider the recommendations and findings of the Committee and will be required to arrive at a decision with respect to the proposed corrective action against the accused with sixty (60) days of the submission of the report by the Committee.

The Management has the right to issue such order and / or directions as it deems fit. The Management shall also endorse a copy of its order to the Complainant, Accused and to the Committee.

10. Punishment for Sexual Harassment/Violence

The Management can impose the following penalties, which are indicative and not exhaustive on an employee who is found guilty of sexual harassment/violence. These can be further classified as minor and major penalties, as follows:

- **Minor penalties**
 - Written warning
- **Major penalties**
 - Withholding of performance based pay awards and bonus
 - Withholding of Promotion/ Increment
 - Termination of service

Further, the employee may also be required to give a written apology to the complainant and upon his/her failure to do so, the penalty can be enhanced.

11 Criminal Proceedings

In case the act under sexual harassment/violence amounts to a specific offence under the Indian Penal Code, 1860 or under any other applicable law, the Management shall initiate appropriate action, in accordance with law, by making a complaint with the appropriate authority.

12. Protection against Victimization

The following will be obligations of the Company, during the processing / investigation of the Complaint:

- In the event the Accused is the Complainant's Reporting Manager / senior, the Company will review the possibility of relocating the complainant employee within the Company and ensure that the Complainant is not being evaluated by the Accused
- Ensure that any sort of retaliation against the Complainant or witnesses is strictly prohibited. Any act of reprisal, including internal interference, coercion and restraint, by the Accused,

whether directly or indirectly, will result in appropriate action against the Accused by the Committee in consultation with the Management;

- In case the Accused is a third party or customer interacting with the Company, such Accused shall not be allowed to enter the Company premises except for the purpose of attending any meeting / interaction as and when required by the Committee
- If required, Company will give support to the victim through health services, counselling or legal support.

Post conclusion of the investigations of the Complaint, the Company will observe the following:

- If the Accused is found to be guilty, the Accused shall not write the evaluation / reports of the Complainant, if he / she is otherwise authorized to do so
- In case the Accused is a third party or customer interacting with the Company, and found to be guilty, the Accused may not be allowed to enter the Company premises.
- In the event, the Committee after investigation of a Complaint in accordance with the procedure prescribed herein, concludes that the Complaint was false and made with malafide intention by the Complainant, then the Committee shall take such appropriate measures, in consultation with the Management, against the Complainant, as it may deem necessary.

13. Modifications and Review of the Policy and Disclosure

The Committee reserves the right to modify and/ or review the provisions of this Policy, so as to comply with applicable legal requirements, internal policies, or with a view to align / alter the provisions of the policy to the extent deemed necessary by Committee from time to time. Company shall place in its Annual report minimum information required to be disclosed under the Act or Companies Act, 2013 or any other applicable laws.

14. Exceptions

There are no exceptions to this policy.

15. Contact

All queries and clarifications on the policy and procedures may be referred to the Human Resources Team of the Company

Annexure A

Details of Sub-Committees

1. Names, Composition and coverage of Sub-Committees

S. No.	Committee and Sub-Committees	Composition	Regions covered
1	Committee	Ms. Manjari Jhingran - Presiding Officer	HO- Delhi NCR, Rohtak, Rewari & Faridabad (Haryana)
		Ms. Shipra Singhal - Member	
		Ms. Shweta Sharma – Member	
		Ms. Pragya Bhushan : External Member	
2	Sub-Committee (West)	Ms. Kirti Jain - Presiding Officer	West- Maharashtra, MP & Gujarat
		Mr. Jayant Kumar Gurjar - Member	
		Mr. Harsh Mehta - Member	
		Ms. Pragya Bhushan- External Member	
3	Sub-Committee (North)	Ms. Bhoomika - Presiding Officer	North Region including branches across Punjab, UP, Uttarakhand, Rajasthan & Haryana (excluding Rohtak, Rewari & Faridabad)
		Mr. Arjun Singh - Member	
		Mr. Raman Kumar Singh	
		Ms. Pragya Bhushan- External Member	
4	Sub-Committee (South)	Ms. Mili Joshi - Presiding Officer	South - Andhra Pradesh, Telangana & Tamil Nadu
		Mr. Jones Kokkiligadda - Member	
		Mr. Kartheep Kumar G T - Member	
		Ms. Pragya Bhushan : External Member	
5	Permanent Invitees in all Committees	Ms. Neeta Kamra - Company Secretary & Head - Compliance, Legal & Internal Audit	
		Mr. Anil Rathore - Head HR	
		Mr. Rohit Agarwal - Head RCU	

2. Rules governing Sub-Committee:-

All the rules enunciated for Committee in the Policy are also applicable to the Sub-Committees unless otherwise stated herein or elsewhere in the Policy.

3. Minutes of Proceedings

Sub-committees shall at least once in a year place the minutes of its proceedings before Committee for its review.

4. Decision of Sub-Committee

The decision taken by the sub-committee on any matter shall not be effective unless approved or ratified by the Committee.