

## **Policy on Prevention of Sexual Harassment**

## **Policy Statement:**

As a Company, we are committed to conducting and governing ourselves with ethics, transparency and accountability and to this, we have developed governance structures, practices and procedures that ensure that ethical conduct at all levels is promoted across our value chain. The work environment at all our locations is conducive to fair, safe and harmonious relations, based on mutual trust and respect, between all the associates of the Company. We also strive to guarantee a safe and welcoming environment to all those who visit any of our locations in any capacity.

The Company aims to provide a safe working environment and prohibits any form of sexual harassment. Hence any act of sexual harassment or related retaliation against or by any associate is unacceptable. This policy therefore, intends to prohibit such occurrences and also details procedures to follow when an associate believes that a violation of the policy has occurred within the ambit of all applicable regulations regarding sexual harassment.

Making a false complaint of sexual harassment or providing false information regarding a complaint will also be treated as a violation of policy.

## **Applicability:**

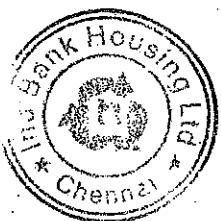
This policy will extend to all employees of the Company including those employed on regular, temporary, ad-hoc or daily wage basis, either directly or through an agent, including a contractor, whether for a remuneration or not, or working on a voluntary basis or otherwise.

The policy also extends to those who are not employees of the Company, such as customers, visitors, vendors, suppliers, contract worker, probationer, trainee, apprentice or called by any other name, but are subjected to sexual harassment at the Premises (defined hereinafter) of the Company.

### **Scope:**

The scope of the Policy is restricted to the following for all Employees:

- i. business locations of the Company
- ii. Registered office of the Company/ All branch offices of the Company.



## Definition:

—Aggrieved Associate means in relation to a workplace, any individual, of any age whether employed in the Company or not, who alleges to have been subjected to any act of Sexual Harassment by the associate of the Company.

—Employer means in any workplace, any person responsible for the management, supervision and control of the Workplace.

—Sexual harassment includes any unwelcome sexually determined behavior (direct or implied) such as physical contact and advances, unwelcome communications or invitations, demand or request for sexual favors, sexually cultured remarks, showing pornography, creating a hostile work environment and any other unwelcome. —sexually determined behavior (physical, verbal or non-verbal conduct) of a sexual nature.

This is only an indicative list of the possible acts which could be treated as sexual harassment and is in no way intended to be construed as an exhaustive list.

In countries where local laws / regulations have clearly defined sexual harassment and procedure to address any complaint relating to it, the interpretation of sexual harassment and the investigation procedure shall be guided in accordance with the local laws / regulations as applicable.

## Prevention Action:

The Company will take reasonable steps to ensure prevention of sexual harassment at work place which may include circulating applicable policies and other relevant information to all associates, including all new joiners.

## FILING OF A COMPLAINT:

If any Associate believes that (s)/he has been subjected to sexual harassment, she/he could opt for the informal machinery or the formal machinery.

- **Informal Machinery:** In the event of any employee harassed, she/he can approach the Counselor who will give a patient hearing of the grievance, provide support, call the harasser and seek to redress the grievance while at the same time maintain confidentiality. If the counselor does not succeed, the counselor will explain to the employee the formal procedure to redress the grievance.

In any event, this procedure is optional and it is for the complainant to decide whether to pursue the informal route.

- **Formal Machinery:** The formal grievance handling machinery will be a Complaint Committee. The Committee will investigate into the complaint and for which the



committee will meet as soon as practicable upon receipt of the complaint. The Committee will have power to call any person and record their statements and make such investigation as may be necessary to decide as to the truth and falsity of the complaint. In the event of the Committee coming to a prima facie conclusion that the complaint is true, it will be for the management to initiate disciplinary action, conduct an enquiry and impose necessary punishment, including termination of service, depending on the gravity of the misconduct and in accordance with the rules/ regulations.

The aggrieved associate may file a written complaint with any member of the Committee or send an email to [indhouse@indbankhousing.com](mailto:indhouse@indbankhousing.com) within three (3) months from the date of incident or in case of series of incidents, within a period of three (3) months from the date of last incident and within 180 calendar days for ex-employees of the Company and in case of a series of incidents, within a period of three months from the date of last incident.

The Committee 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 Aggrieved Associate from filing a complaint within the said period.

In case the complaint cannot be made in writing the Presiding Officer or any member of the Committee, as the case may be, shall render all reasonable assistance to the Aggrieved Associate for making the complaint in writing. Where the Aggrieved Associate is unable to make a complaint on account of its physical or mental incapacity or death or otherwise, their legal heir and in case of a woman the complaint can be made by such other person, as per the definition provided herein under as may be prescribed may make a complaint under this Policy.

The Committee may, before initiating an inquiry and at the request of the Aggrieved Associate take steps to settle the matter between the Aggrieved Associate and the respondent through conciliation, provided that no monetary settlement shall be made as a basis of conciliation.

Where a settlement is arrived, no further inquiry shall be conducted by the Committee, as the case may be. The Committee shall provide the copies of the settlement as recorded to the Aggrieved Associate, respondent and the Company, for records.

In case the conciliation fails to arrive at a settlement or if the Aggrieved Associate informs the Committee that the terms and conditions of the settlement have not been complied with by the respondent, the Committee shall proceed to make an inquiry into the complaint filed before the Committee.

Complaints brought after that time period will not be pursued except extraordinary circumstances. The determination of whether the complaint was timely or whether



extraordinary circumstances exist to extend the complaint period must be made by the Committee in conjunction with the Legal team of the Company.

Complaints made anonymously or by a third party must also be investigated to the extent possible.

If the complaint does not rise to the level of sexual harassment, the Committee may determine to dismiss the complaint without further investigation after consultation with Legal Team.

### **Constitution of the Committee:**

The Company shall have an Internal Complaints Committee ('The Committee') at the Registered Office, Chennai, to specifically address any complaints of sexual harassment. The Committee will be constituted by the Company and would be headed by a Presiding Officer, who shall be a woman Associate employed, as far as possible, at a senior level at workplace from amongst the Associates.

The Internal Complaints Committee shall comprise of the following members:

- Not less than two members amongst Associates preferably committed to the cause of women or who have had experience in social work or have a legal knowledge; and
- One member from amongst non-governmental organization or associations committed to the cause of women or a person familiar with the issues relating to sexual harassment. Provided that, at least one-half of the total members so nominated shall be women, if sufficient number of woman are available.

In addition to handling complaints of sexual harassment, the committees will also co-ordinate preventive activities to create a sexual harassment free atmosphere via:

- Common Information mappers
- Floating Articles on the same, from time to time
- Display at any conspicuous place in the workplace, the penal consequences of sexual harassments.
- Organize workshops and awareness programmes at regular intervals for sensitizing the Associates with the provisions of the Act.

The Presiding Officer and every Member of the Committee shall hold office for a period not exceeding three years, from the date of their nomination. Inclusion or removal of Committee Members shall be on the following grounds:

- Contravention of the Policy or the legal provisions of the act;



- has been convicted for an offence or an inquiry into an offence under any law for the time being in force and is pending against him/her
- has been found guilty in any disciplinary proceedings or a disciplinary proceedings is pending against him/her
- has abused his/her positions so as to render his/her continuance in office prejudicial to the public interest.

**PROCESS OF ENQUIRY:**

- The Committee will ask the Aggrieved Associate to prepare a detailed statement of incidents/allegations. The Aggrieved Associate may be required to submit six (6) copies of the complaint along with supporting documents and the names and addresses of the witnesses. The statement of allegations will be shared with the respondent within seven (7) working days.
- The respondent will be asked to prepare a response to the statement of allegations, along with the list of documents and names and addresses of the witnesses and submit to the Committee within a period not exceeding ten (10) working days.
- The statements and other evidence obtained in the inquiry process will be considered confidential.
- The Committee will organize verbal hearings with the complainant and the respondent, in accordance with the principles of natural justice.
- During the course of inquiry, the Committee shall make a copy of the findings available to both the Parties enabling them to make representations against the findings before the Committee.

Upon completion of the investigation, both parties will be informed of the results of the investigation.

**Decision and Action:**

During the pendency of inquiry, on a written request made by the Aggrieved Associate, the Committee, may recommend to the Company to -

- (a) transfer the Aggrieved Associate or the respondent to any other workplace; or
- (b) grant leave to the Aggrieved Associate; or
- (c) grant such other relief to the Aggrieved Associate as may be appropriate.

The leave granted to the Aggrieved Associate under this section shall be in addition to the leave he/she would be entitled to otherwise if the case is proved.



Once the investigation is completed, the Committee shall provide a report of its findings to the Company, within ten (10) days from the date of completion of the inquiry and such report shall be made available to the concerned parties. The Company shall act upon the recommendation of the Committee within sixty (60) days of receipt of the report of the Committee.

The Committee shall make a determination regarding the validity of the harassment allegations. If it is determined that the harassment has not occurred, it shall recommend to the Company that no action is required to be taken in this matter. If it is determined that harassment has occurred; prompt, remedial action will be taken. The Committee will share the investigation details and the findings thereof with the appropriate functional Head HR and agree on the applicable disciplinary action.

**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 at any time.

