

PREVENTION OF SEXUAL HARASSMENT AT THE WORKPLACE

1.0 POLICY

HINDUJA HOUSING FINANCE LIMITED, (HHF), is an equal employment opportunity company and is committed to creating a healthy working environment that enables employees to work without fear of prejudice, gender bias and sexual harassment. The Company also believes that all employees of the Company have the right to be treated with dignity. Sexual harassment at the work place or other than work place if involving employees is a grave offence and is, therefore, punishable.

2.0 SCOPE AND EFFECTIVE DATE

- 2.1 This Policy extends to all employees of the Company and is deemed to be incorporated in the service conditions of all employees and comes into effect immediately.
- 2.2 Sexual harassment would mean and include any of the following:
- i) Unwelcome sexual advances, requests or demand for sexual favours, either explicitly or implicitly, in return for employment/continuation of employment, promotion, examination or evaluation of a person towards any company activity;
 - ii) Unwelcome sexual advances involving verbal, non-verbal, or physical conduct such as sexually coloured remarks, jokes, letters, phone calls, e-mail, gestures, showing of pornography, lurid stares, physical contact or molestation, stalking, sounds, display of pictures, signs, verbal or non-verbal communication which offends the individuals sensibilities and affect her/his performance;
 - iii) Eve teasing, innuendos and taunts, physical confinement against one's will and likely to intrude upon one's privacy;
 - iv) Act or conduct by a person in authority which creates the environment at workplace hostile or intimidating to a person belonging to the other sex;
 - v) Conduct of such an act at work place or outside in relation to an Employee of HHF, or vice versa during the course of employment; and
 - vi) Any unwelcome gesture by an employee having sexual overtones
- 2.3 "Employee" means any person on the rolls of the Company including those on deputation, contract, temporary, part time or working as consultants.

3.0 INTERNAL COMPLAINTS COMMITTEE

- 3.1 A Committee has been constituted by the Management to consider and redress complaints of Sexual Harassment. The Chairman and Members of the Committee are as follows:

Name	Designation	Membership
Ms. Hepsiba Bala S	Corporate HR Manager	Presiding Officer
Ms. Shipra Singal	Geo Head, Credit	Member
Mr. P V Solomon Kiran	Head – HR	Member
Dr. Prasanna Gettu	Founder and CEO of International Foundation for Crime Prevention and Victim Care (PCVC)	External Member

- 3.2 A quorum of 2 members, one of whom shall be a woman is required to be present for the proceedings to take place.



4.0 REDRESSAL PROCESS

- 4.1 Any employee who feels and is being sexually harassed directly or indirectly may submit a complaint of the alleged incident to any member of the Committee in writing with his/her signature within 10 days of occurrence of incident. Alternatively, an employee can raise the request in Employee Disciplinary Portal under discreet compliant section or can email to icc.posh@hindujahousingfinance.com.
- 4.2 The Committee will maintain a register to record the complaint received by it and keep the contents confidential, if it is so desired, except to use the same for discreet investigation.
- 4.3 The Committee will hold a meeting with the Complainant within five days of the receipt of the complaint, but no later than a week in any case.
- 4.4 At the first meeting, the Committee members shall hear the Complainant and record her/his allegations. The Complainant can also submit any corroborative material with a documentary proof, oral or written material, etc., to substantiate his / her complaint. If the Complainant does not wish to depose personally due to embarrassment of narration of event, a lady officer for lady employees involved and a male officer for male employees, involved shall meet and record the statement.
- 4.5 Thereafter, the person against whom complaint is made may be called for a deposition before the Committee and an opportunity will be given to him / her to give an explanation.
- 4.6 The Committee, before initiating a formal inquiry on the basis of the complaint will take steps to settle the matter between the complainant and the respondent through conciliation provided no monetary settlement shall be made as a basis of conciliation. Wherever such settlement has been arrived, the Committee shall record it and send the same to the HEAD – HR to take action as per recommendation. Once such settlement has been arrived at no further enquiry shall be conducted by the Committee. However, a further reference to the Committee may be made for redressal if the terms of settlement have not been complied with.
- 4.7 In the event, the complaint does not fall under the purview of Sexual Harassment or the complaint does not mean an offence of Sexual Harassment, the same would be dropped after recording the reasons thereof.

5.0 ENQUIRY PROCESS

- 5.1 If no conciliation is arrived at, the Committee shall proceed with the Enquiry and communicate the same to the Complainant and person against whom complaint is made.
- 5.2 The Committee shall prepare and hand over the Statement of Allegation to the person against whom complaint is made and give him / her an opportunity to submit a written explanation if she / he so desires within 7 days of receipt of the same.
- 5.3 The Complainant shall be provided with a copy of the written explanation submitted by the person against whom complaint is made.
- 5.4 If the Complainant or the person against whom complaint is made desires any witness/es to be called, they shall communicate in writing to the Committee the names of witness/es whom they propose to call.
- 5.5 If the Complainant desires to tender any documents by way of evidence before the Committee, she / he shall supply original copies of such documents. Similarly, if the person against whom complaint is made desires to tender any documents in evidence before the Committee he / she shall supply original copies of such documents. Both shall affix his / her signature on the respective documents to certify these to be original copies.
- 5.6 The Committee shall call upon all witnesses mentioned by both the parties.
- 5.7 The Committee shall provide every reasonable opportunity to the Complainant and to the person against whom complaint is made, for putting forward and defending their respective case.

5.8 The Committee shall complete the “Enquiry” within reasonable period but not beyond three months and communicate its findings and its recommendations for action to the Head-HR within ten days of the completion of the enquiry. If the complaint of sexual harassment is proved, the Committee may recommend any one or more of the following actions:

- Actions in accordance with misconduct mentioned in service rules
- Issue a verbal warning
- Issue a warning in writing
- Issue a suspension
- Deprived of increment or promotion
- To deduct, notwithstanding anything in the service rules applicable, from the salary or wages of the accused person the such sum as it may consider appropriate to be paid to the aggrieved.
- Order dismissal depending upon the severity & sensitivity of the incident
- Financial Penalty (In accordance with the mental, physical trauma, loss of career opportunity, medical expenses) in lump sum or in instalments.

The report of the Committee shall be treated as an enquiry report on the basis of which an erring employee can be awarded appropriate punishment straightaway.

5.9 The Head-HR will direct appropriate action in accordance with the recommendation proposed by the Committee.

5.10 In case the Committee on conclusion of the enquiry finds that the allegation was malicious or was made knowing it to be false, or the complainant has produced any forged / misleading document, it will recommend action to be taken by HEAD-HR, against the complainant. In all such cases the malicious intent on the part of the complainant must be established before any action is recommended.

5.11 The Committee will protect the identity of all individuals involved during the process, including the complainant and respondent and contents of complaints and enquiry proceedings.

6.0 OTHER POINTS TO BE CONSIDERED

6.1 No anonymous complaints will be entertained in terms of this Policy.

6.2 The management shall provide all necessary assistance for the purpose of ensuring full, effective and speedy implementation of this policy.

6.3 Where sexual harassment occurs as a result of an act or omission by any third party or outsider, HHF shall take all steps necessary and reasonable to assist the affected person in terms of support and preventive action.

6.4 The Committee shall analyse and put up report on all complaints of this nature at the end of the year for submission to Head- HR. The Management will include in the Annual report of the Company information on the number of complaints received under this Policy and disposal thereof.

6.5 In case the Committee finds the degree of offence coverable under the Indian Penal Code, then this fact shall be mentioned in its report and appropriate action shall be initiated by the Management, for making a Police Complaint.

7.0 RELATIONSHIPS IN THE WORKPLACE POLICY

A. To manage potential conflicts of interest arising from personal relationships at work.

B. To protect all employees from any conduct that may amount to sexual harassment, abuse of power, or retaliation.

7.1 Scope: This policy applies to all employees, including permanent, probationary, trainees, interns, consultants, contractual, retainers and outsourced staff across all branches, corporate office, and field locations.

7.2 Workplace Relationships:

A. Prohibited Relationships / behaviours / actions:

- a. Romantic, intimate, or sexual relationships between an employee and an individual over whom they hold direct or indirect authority (e.g., hiring, appraisal, promotion, work allocation, disciplinary action) are strictly prohibited.
- b. Attempts to initiate such relationships — whether verbal, written, any digital mediums or through influence — are also prohibited.
- c. Meeting female colleagues in hotel rooms or private accommodations, at any point of time, is strictly prohibited. All official interactions must be conducted in professional and appropriate settings such as office premises, designated meeting rooms, or approved business venues.

B. Disclosure of Consensual Relationships

- a. Employees in a mutual, consensual relationship with a peer or colleague must voluntarily disclose the relationship to HR.
- b. HR will evaluate potential risks and may suggest corrective steps (e.g., team restructuring, shift in approval roles).

C. Professional Conduct

- a. Employees engaged in a consensual relationship with a peer must promptly disclose the relationship to HR.
- b. HR will assess potential conflicts of interest and may recommend adjustments (e.g., transfer, reporting line modification).

D. Safeguards Against Sexual Harassment (POSH Compliance)

- a. Any relationship or conduct that involves unwelcome advances, quid pro quo implications, favouritism, or creates a hostile environment constitutes sexual harassment under the POSH Act.
- b. All employees are protected under the Company's POSH Policy and may approach the Internal Committee (IC) with complaints.
- c. Retaliation against complainants or witnesses will result in strict disciplinary action.

E. Roles & Responsibilities

- a. Employees: Must disclose relationships, avoid conflicts of interest, and comply with POSH and this policy.
- b. Managers/Supervisors: Must ensure team objectivity, report potential risks, and prevent misuse of power.
- c. HR Department: Responsible for confidential disclosures, assessing conflicts, recommending adjustments, and coordinating with the Internal Committee where required.

F. Enforcement & Disciplinary Action

- a. Violations of this policy, including failure to disclose a relationship, misuse of power, or engaging in harassment, will invite disciplinary measures up to termination of employment.
- b. The company reserves the right to take corrective actions (transfer, reporting changes, or other measures) to safeguard fairness and compliance.