



ANTI SEXUAL HARASSMENT POLICY

LAST AMENDMENT: 02ND APRIL 2018

AUTHORITY: BOARD OF DIRECTORS

PREFACE

Tattva Fincorp Limited is committed to creating a healthy working environment that enables employees to work without any fear of prejudice or bias or harassment based on gender or sex. The Company believes that all employees of the Company have the right to be treated with dignity. Sexual harassment at the workplace or other than workplace if involving employees of **Tattva Fincorp Limited** is a grave offence and is, therefore, punishable.

Based on the **SEXUAL HARASSMENT OF WOMEN AT WORKPLACE (PREVENTION, PROHIBITION AND REDRESSAL) ACT 2013**, **Tattva Fincorp Limited** has drafted the following policy to implement the said Act in its true spirit and create a work environment in the Company, which is free from gender and sexual discrimination.

SCOPE AND EFFECTIVE DATE

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 from the date of approval by the Board of Directors.

Definitions

- a) **Aggrieved Woman:** A woman, in relation to a workplace, of any age whether employed or not, who alleges to have been subjected to any act of sexual harassment by the respondent.
- b) **Employee:** A person employed at workplace for any work on regular, temporary, ad hoc, or daily wage basis, either directly or through an agent, including a contractor, with or without knowledge of the principal employer, whether for remuneration or not, or working on a voluntary basis or
- c) otherwise, whether the terms of employment are expressed or implied and includes a co-worker, a contract worker,
- d) Probationer, trainee, apprentice or called by any other name.
- e) **Domestic Worker:** A woman who is employed to do the household work in any household for remuneration whether in cash or 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.
- f) **Employer:** In relation to any Department, Organisation, Undertaking, Establishment, Office Branch, the Head of that Department, Organisation, Undertaking, Establishment, Office Branch as the case may be. In the given case, **Tattva Fincorp Limited** will come under the definition of "Employer". In a workplace not covered above, any person responsible for the management,

supervision and control of the workplace.

- g) **Internal Complaints Committee:** The Committee constituted to conduct a query into the complaint lodged by the complainant.
- h) **Member:** Member of the Internal Complaints Committee.
- i) **Presiding Officer:** Presiding Member of the Internal Complaint Committee.
- j) **Respondent:** The person against whom the aggrieved woman has made a complaint.
- k) **Work Place:** It includes any organisation, undertaking, establishment, office or branch controlled by the employer directly or indirectly.

It also includes any private sector organisation or a private venture, undertaking, enterprise, institution, establishment, society, trust carrying on commercial, professional, vocational, educational, entertainment, industrial, health services or financial activities including production, supply, sale, distribution or service.-

Any other place visited by the employee arising out of, or during the course of employment including transportation provided by the employer for undertaking the employment.

In the given case , the workplace covers Offices, plants, labs, warehouses, storerooms, workshops, vehicles (moving or stationary), rented rooms or offices and any other area where, any process/ activity related to the business of Tattva Fincorp Limited is taking place or carried out by or on behalf of Tattva Fincorp Limited.

Sexual Harassment: No women shall be subjected to sexual harassment at any workplace. The sexual harassment includes any one or more of the following unwelcome acts or behaviour:

- i) Physical contacts or advances
- ii) A demand or request for sexual favours
- iii) Making sexually coloured remarks
- iv) Showing pornography
- v) Any other unwelcome physical, verbal or non-verbal conduct of sexual nature.

If the following circumstances exist in relation to any behaviour, it would also be counted as sexual harassment.

- i) Implied or explicit promise of preferential treatment in employment
- ii) Implied or explicit threat of detrimental treatment in employment
- iii) Implied or explicit threat about her present or future employment status
- iv) Interferences with work or creates an intimidating/hostile/offensive work environment
- v) Humiliating treatment likely to affect her health and safety.

INTERNAL COMPLAINTS COMMITTEE AND ITS TENURE:

Tattva Fincorp Limited has constituted an Internal Complaints Committee, as given below with effect from the date of approval by the Board of Directors of the Company.

| SL NO | NAME & STATUS | DESIGNATION | UNIT/AREA | CONTACT NO & MAIL ID |
|-------|---|---------------------|-----------------------|---|
| 01 | Ms Divya (Sr HR Executive) | Presiding Member | Corp Office | 8943330044 divya@tattvafincorp.com |
| 02 | Ms Sinija (Asst Manager) | Member | Palakkad Branch | 9072611440 operations.pkd@tattvafincorp.com |
| 03 | Ms Martina Jubi (Asst Manager) | Member | Chalakkudy Branch | 9072611457 operations.ckdy@tattvafincorp.com |
| 04 | Ms Sujana (Asst Manager) | Member | Pattambi Branch | 9072611469 operations.ptb@tattvafincorp.com |
| 05 | Ms Tintu Gopal (Executive Operations) | Member | Kochi Branch | 9072948888 operations.cok@tattvafincorp.com |
| 06 | Ms Jijimol Asst Manager - Operations | Member | Coimbatore Branch | 7094473704 operations.cbe@tattvafincorp.com |
| 07 | Ms Vijala Lakshmi Fin. Executive | Member | Madurai Branch | 9655649351 |
| 08 | Mr Amith Madhavan (Director) | Member | Corp Office | 8943550000 amithmadhavan@tattvafincorp.com |
| 09 | Adv Paulochan | Member | Independent Member | 9061063185 |
| 10 | Mr Sugesh Ram Company Secretary | Member Secretary | Corp office | 8943110999 cs@tattvafincorp.com |

The Presiding Officer and its every member shall hold office for such period not exceeding 3 years from the date of their nomination. If any vacancy occurs, it will be filled by the employer within 30 days from the date of falling vacant.

COMPLAINT OF SEXUAL HARASSMENT

Any aggrieved woman may make in writing (in a legible manner without any overwriting, cutting or cluttering in either Malayalam or English or Tamil) a complaint of sexual harassment at workplace to the Internal Complaints Committee within a period of three months from the date of alleged incident and in the case of series of incidents, within a period of three months from the date of last incident.

Provided that, if such a complaint cannot be made in writing the Internal Complaints Committee may render all assistance for the woman for making the complaint in writing.

If the aggrieved woman is unable to make a complaint on account of her physical and mental incapacity, her legal heir or any other person on her behalf may make the complaint.

CONCILIATION

The Internal Complaint Committee, before initiating the inquiry, at the request of the aggrieved woman may take steps to settle the matter between her and the respondent through conciliation.

However, no monetary settlement is permitted.

Once the settlement arrives, copies of the settlement will be provided to the aggrieved woman and the respondent and no further inquiry will be conducted by the ICC.

INQUIRY INTO THE COMPLAINT

The Internal Complaint Committee, upon receipt of the complaint, should proceed to make the inquiry and if prima facie evidence is found, forward the complaint to the local police within a period of seven days.

Provided further that where the parties are employees, the parties shall, during the course of the inquiry, be given an opportunity of being heard and a copy of the findings shall be made available to both the parties enabling them to make representations against the findings before the Committee.

While making the inquiry, the Internal Complaints Committee shall have the same powers as vested in a civil court under the Code of Civil Procedures:

- 1) Summon and enforce the attendance of any person and examine him/her on oath.
- 2) Require the discovery and production of documents
- 3) Any other matter as may be prescribed

The Internal Complaints Committee should complete the inquiry within a period of one month from the date of receipt of the complaint.

ACTION DURING THE PENDENCY OF INQUIRY

During the pendency of an inquiry, on a written request made by the aggrieved party, the Internal Complaint Committee may:

- 1) Transfer the woman to another workplace (only on the written request of the victim)
- 2) Grant leave for a period of three months

The leave granted thus will be in addition to the leave she would be otherwise entitled.

INQUIRY REPORT

On the completion of the inquiry, Internal Complaint Committee shall provide a report of its findings to the employer (Board of Directors) along with the recommendation on the action to be taken against the respondent if found guilty and the employer, within 7 days, has to take the recommended actions.

The Actions against the respondent may be:

- a) As per the service rules
- b) Deduct such amount as may deem appropriate from the salary or wages of the respondent to pay compensation to the aggrieved woman or to her legal heirs.

The compensation may be fixed based on the following factors:-

- a) The loss in the career opportunity due to the incident of sexual harassment
- b) The mental trauma, pain, suffering and emotional stress caused to the aggrieved woman.
- c) Medical expenses incurred by the victim for physical/psychiatric treatment
- d) The income and financial status of the respondent.
- e) Feasibility of such payment in lump sum or in instalment.

PUNISHMENT FOR FALSE COMPLAINT:

Where the Internal Complaint Committee, arrives at the conclusion that the allegation against the respondent is malicious, or the complainant made the allegation knowing it to be false, the employer (Board of Directors) may take appropriate action against the complainant.

PROHIBITION OF PUBLICATION OF CONTENTS OF COMPLAINT

Notwithstanding anything contained in Right to Information Act 2005, the contents of the complaint, identity of the complainant, inquiry proceedings and findings, the recommendation of the Internal Complaint Committee shall not be published or communicated to anybody or made known to the public.

Any person, who was privy to the subject matter, discloses it to anybody, will be penalised by the employer.

ANNUAL REPORT

The Internal Complaint Committee shall in each calendar year prepare in such form and at such time as may be prescribed, an Annual Report and submit the same to the employer.

S/d
(C. Vijayakumaran Nair)
Managing Director
For And On Behalf of Board of Directors of Tattva Fincorp Limited
As amended on 02.04.2018