

## **PREVENTION AND REDRESSAL OF ANY SEXUAL HARASSMENT AT THE WORKPLACE (POSH POLICY)**

Pragati Finserv Private Limited (“**Pragati Finserv**”) is an equal opportunities employer and it is the objective of Pragati Finserv to provide a free and safe working environment for all its employees, especially for women. Hence a policy has been framed for the prevention and redressal of any sexual harassment at the workplace.

The policy follows the broad guidelines of The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (hereinafter referred to as the “*Sexual Harassment Act*”) and guidelines as laid down under the international Convention for Elimination of all forms of Discrimination Against Women. At all times, Pragati Finserv shall ensure that it is in compliance with applicable laws, rules, regulations and orders relating to sexual harassment at the workplace, as may be amended from time to time.

Pragati Finserv takes all efforts to provide a safe environment and provide a policy for the prevention and redressal of sexual harassment at the workplace in keeping with the principles of equality, freedom, life and liberty as enshrined in the Constitution of India.

Any act which tantamount to sexual harassment shall be considered a misconduct under the provisions of Pragati Finserv’s policy and action as deemed fit will be taken against the perpetrators after due enquiries and processes have been completed to establish the facts of the case.

### **1. Definitions for the purpose of this policy**

‘*Complainant*’ means, in relation to a Workplace, a person of any age whether employed or not, who alleges to have been subjected to any act of Sexual Harassment by the Respondent.

‘*Respondent*’ means a person against whom the Complainant has made a complaint to the Internal Complaints Committee under this policy.

‘*Sexual Harassment*’ includes any one or more of the following unwelcome acts or behaviour (whether directly or by implication) namely: -

- (i) physical contact or advances; or
- (ii) a demand or request for sexual favours; or
- (iii) making sexually coloured remarks; or
- (iv) showing pornography; or
- (v) any other unwelcome physical, textual, graphic, electronic, verbal or non-verbal conduct of sexual nature.

‘*Workplace*’ is defined as any place where the Complainant or Respondent is employed, works, or visits in connection with work, during the course of or arising out of employment.

## **2. Internal Complaints Committee:**

In order to ensure a safe environment, Pragati Finserv has constituted an 'Internal Complaints Committee'.

Any complaint of Sexual Harassment at the Workplace may be made in writing by the Complainant (or by the legal heir, in case of any incapacity of the Complainant), to any member of the Committee within 3 months of the last incident complained against. The Committee may however permit relaxation in this regard if it is satisfied that the circumstances were such that the Complainant was prevented from filing the complaint within the stipulated period.

## **3. Constitution of the Committee:**

The Committee would consist of five members. At present the Committee shall comprise of the members as provided in Annexure 1.

Another external member shall be nominated from an NGO or association committed to the cause of women or a person familiar with issues relating to sexual harassment, who shall be paid fees/allowances for holding the proceedings of the Committee.

Each member shall hold office for a specified period, not exceeding three years, and shall be eligible for reappointment. Notwithstanding the foregoing, Pragati Finserv may remove and replace any member from the Committee in case of misconduct, breach of confidentiality or abuse of position.

## **4. Procedure:**

On receipt of the complaint, the Committee may at the request of the Complainant attempt to settle the matter between the Complainant and the Respondent. However, such conciliation shall not involve any monetary compensation. Where a settlement has been arrived at pursuant to conciliation, the Committee shall record the settlement and forward the same to Pragati Finserv and all the relevant parties to be acted upon. There shall be no further inquiry unless the Complainant informs the Committee that the Respondent has not complied with the terms of the settlement.

In all other instances, the Committee will initiate action to inquire into the complaint by interviewing the Complainant, Respondent and any witnesses. They will also attempt to determine whether there are any individuals with any direct or indirect information regarding the complaint, interview such persons and gather all information relating to the complaint (including documentary or electronic information).

The Committee will ensure that the Complainant and the Respondent are called separately, so as to ensure freedom of expression and an atmosphere free of intimidation. The Committee shall have similar powers as vested in a civil court trying a similar suit under the Code of Civil Procedure, 1908.

On completion of the inquiry, the committee shall submit a written report at the earliest, but not later than ninety days from the date of filing of the complaint. Appropriate action will be recommended and taken based on the findings of the committee. Where both the parties are employees of Pragati Finserv, a copy of the findings shall be made available to them.

## **5. Interim Measures:**

While the inquiry is pending, the Committee may, on the written request of the Complainant, make any appropriate recommendation as it deems fit, including the transfer of the Complainant or the Respondent to any other workplace or grant of leave to the Complainant up to a period of three months (in addition to the leave that the Complainant would otherwise be entitled to). Pragati Finserv shall then submit a report of its implementation to the Committee.

## **6. Findings and Action:**

On completion of the inquiry on the charges of sexual harassment, action will be decided based on the nature of the complaint and the findings of the committee.

Based on the conclusions of the Committee, if an act of Sexual Harassment amounts to an offense under the provisions of the Indian Penal Code or any other law in force in the country, Pragati Finserv will initiate other actions under the provisions of the law. This would include advising the affected employee about their rights to initiate action in accordance with the law and providing the necessary assistance to file the complaint.

If the complaint against the Respondent has been proven during the inquiry, the Committee may recommend action against the Respondent, treating Sexual Harassment as misconduct. This may lead to dismissal or a warning not to repeat such action and could include any reasonable course of conduct to redress any loss or damage suffered by the Complainant as a result of the harassment.

The defendant may also be asked to pay compensation to the Complainant, or give a written apology, with a clear understanding that no retaliatory steps will be taken by the defendant against the Complainant. While determining the compensation amount to be paid, the Committee shall keep in mind various factors like loss of career opportunity for the Complainant, medical expenses incurred, mental trauma and emotional distress, income and financial status of the Respondent etc.

Any other punishment ranging from a warning or censure to suspension, reduction in grades, or dismissal / termination of service may also be imposed, depending on the gravity of the act. The guidelines for this will be as per the Sexual Harassment Act.

If the Committee finds that the allegation of Sexual Harassment has not been proved, then it shall make a recommendation that no action is required to be taken in the matter. In case the Committee arrives at a conclusion that the Complainant's allegation is malicious or has been made with the knowledge that it is false; or that the Complainant or any witness has given false evidence / produced a forged or misleading document during the inquiry, then the Committee shall recommend that action be taken against such person(s).

## **7. Confidentiality of complaint and proceedings:**

The contents of the complaint, identity and addresses of all the parties and witnesses involved, and all information relating to the inquiry, conciliation and recommendations shall be kept confidential at all times. However, information regarding the justice secured to any Complainant may be disseminated if so required without disclosing the identity and other particulars that may lead to

identification of the Complainant. Any breach of this confidentiality provision by any person shall be deemed to be misconduct and dealt with accordingly.

**8. Failure to take action on a complaint:**

Where a complaint of sexual harassment is made to a reporting manager or a member of the Internal Committee, but no action is initiated, this neglect may be deemed as misconduct and action, as appropriate may be initiated against the manager concerned for neglect or compromising the working environment of the organization.

**9. Annual reporting of complaints:**

The Committee shall submit a report for each calendar year to Pragati Finserv and the District Officer appointed under the Sexual Harassment Act, specifying the number of complaints filed and their disposal.

**10.Safe Working Environment:**

It is Pragati Finserv endeavour to provide a safe working environment for all its employees. Workshops and sensitization programs shall be conducted at regular intervals and all employees are expected to participate in the same. Employees are also encouraged to bring to the notice of their reporting managers/ senior management any breach in safety or possibility of negative impact on the working space, safety and security of the working environment.

## **ANNEXURE 1**

### **COMPOSITION OF INTERNAL COMPLAINTS COMMITTEE**

- Ms. Gowri, DVP -Credit & Risk Operations (Presiding Officer)
- Ms. Ajitha, DVP - Learning & Development (Member)
- Mr. Rajasekaran NRK, Head- Internal Audit (Member)
- Ms. Monika Gurung, Company Secretary (Member)
- Mr. Pavan Surampudi, Lawyer (External Member)

Contact Number: 92811 62811; Email ID: [posh@pragatifin.com](mailto:posh@pragatifin.com)