

CREDRIGHT FINANCE

POLICY ON PREVENTION OF SEXUAL HARASSMENT AT WORKPLACE (POSH)

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1. Purpose

CredRight Finance Private Limited (“Company”) is committed to creating a safe and healthy work environment that enables its employees to work without fear of prejudice, gender bias and sexual harassment. The Company also believes that all its employees have the human right to be treated with dignity. Sexual Harassment at the workplace or in the course of official duties, if involving employees of the Company shall be considered a grave offence and is therefore punishable under the applicable laws.

The objective of this policy is to provide protection against sexual harassment of women at workplace and for the prevention and redressal of complaints of sexual harassment and for matters connected therewith.

All concerned should take cognizance of the fact that Company strongly opposes sexual harassment, and that such behavior against women is prohibited by the law as set down in The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and Rules framed thereunder being The Sexual Harassment of Women at Workplace Rules (hereinafter referred to as “Act”) as well as the terms of employment. Commission of any act of sexual harassment as defined in the Act and in this Policy shall result in strict disciplinary action.

At CredRight Finance Private Limited, we have zero-tolerance for sexual harassment. We value each and every employee working with us and wish to protect their dignity and self-respect. We are committed towards giving every employee a just and fair hearing on issues encountered by them at the workplace with special attention to sexual harassment. The Company will take very serious disciplinary action against any victimization of the employee who is complaining or the alleged harasser that may result from a complaint.

2. Scope

This policy applies to employees of the Company in all work-related settings and activities, whether inside or outside the workplace, and includes business trips and business-related social events. This also applies to the conduct of an employee towards the customer, supplier and contractor.

The Policy is with respect to Prevention, Prohibition & Redressal of Sexual Harassment which may arise in places not limited to geographical location viz. Company’s offices / branches but includes all such places or locations where acts are conducted in context of working relationships or whilst fulfilling professional duties or which may be visited by an employee during the course of employment including transportation provided by the company for undertaking such visit. The Company’s Policy against Sexual Harassment includes sexual harassment by fellow employees, supervisors, managers as well as agents, contractors, customers, vendors, partners and visitors including outsource employees. Any place visited by the employee arising out of or during the course of employment including transportation provided by the employer for undertaking such journey.

Sexual harassment is judged by the impact on the complainant and not the intent of the Respondent. Sexual harassment as addressed in this Policy need not necessarily be from a male to a female employee, it can be vice versa as well as between individuals of same gender.

This Policy comes into force with immediate effect.

3. Definition

- a) **“Aggrieved Person”** means a person in relation to workplace whether employed or not, who alleges to have been subject to any act of sexual harassment by the Respondent;
- b) **“Company”** means CredRight Finance Private Limited.
- c) **“Complaint”** means a complaint of Sexual Harassment at Workplace.
- d) **“Employee”** means a person employed at a Workplace for any work on regular, temporary, ad-hoc or daily wages basis, either directly or through an agent, including a contractor, with or without the knowledge of the principal employer, whether for remuneration or not, or working on a voluntary basis or otherwise, whether the terms of employment are express or implied, and includes a co-worker, a contract worker, probationer, trainee, apprentice or called by any other such name;

Explanation: The aforesaid definition of ‘Employee’ shall be used only for the purpose of the Policy and cannot be used to claim rights of an employee conferred by any law for the time being in force;

- e) **“Internal Complaints Committee”** means a committee constituted for redressal of Complaints by the Aggrieved Person and make recommendations for resolution to the Management Team;
- f) **“Management Team”** shall mean the person/s vested with the powers to take appropriate action for implementing the decision of the Internal Complaints Committee and shall consist of such officers as designated by the Company from time to time;
- g) **“Respondent”** means a person against whom the Aggrieved Person has made a Complaint.
- h) **“Sexual Harassment”** includes any one or more of the following unwelcome acts or behavior (whether directly or by implication) namely:
 - i. Physical contact and advances; or
 - ii. A demand or request for sexual favours; whether verbal, textual, graphic, electronic or by any other action or
 - iii. Making sexually colored remarks; or
 - iv. Showing pornography; or
 - v. Any other unwelcome physical, verbal or non-verbal conduct of sexual nature.

This includes verbal, non-verbal, or physical conduct such as obnoxious comments or utterances, remarks or jokes, letters, phone calls, SMS or emails, gestures, showing pornography, stalking, sounds

or display of a nature with sexual overtures. It also includes a demand or request for sexual favors in return for with a promise of work-related favors such as performance appraisals, promotions, transfers, salary increases and employment or any other form of reward or recognition.

The following circumstances, among other circumstances, if it occurs or is present in relation to or connected with any act or behavior of Sexual Harassment may amount to Sexual Harassment:

- i. implied or explicit promise of preferential treatment in employment; or
- ii. implied or explicit threat of detrimental treatment in employment; or
- iii. implied or explicit threat about present or future employment status; or
- iv. interference with work or creating an intimidating or offensive or hostile work environment; or
- v. Humiliating treatment likely to affect health or safety.

The definition of sexual harassment shall include any harassment caused to female or male employees. It would also include harassment caused to or by either gender.

- a) **“Third Party”** means any person or persons not on the rolls of the Company but, in the course of work-related activities, interacting with the Company.
- b) **“Team Leaders”** shall mean a team member who may not have any authority over other members but is appointed on permanent or rotating basis to represent the team to the next higher reporting level, make decisions in the absence of a consensus, resolve conflict between team members, and coordinate team efforts.
- c) **“Workplace”** shall mean any place(s) where an Aggrieved Person is employed or works, or visits in connection with his duties during the course of or arising out of his employment and include transportation provided by the employer for undertaking such journey.

4. Core Complaint Committee or Internal Complaint Committee

To prevent instances of sexual harassment and to receive and effectively deal with complaints pertaining to the same, a “Core Complaints Committee or Internal Complaints Committee” is constituted (herein after referred to as “Committee”).

Every complaint received shall be forwarded to the Committee formed under the policy for redressal. The investigation shall be carried out by the Committee constituted for this purpose.

Committee has been constituted of the following members as nominated by the Company:

- a) The Internal Complaints Committee (Committee) shall be comprised of not less than 4 (four) members, nominated by the Board of Directors. Provided that at least one-half of the total members so nominated shall be women.
- b) A woman employee employed at a senior level amongst the employees shall act as Presiding officer of the committee.
- c) Not less than 2 members from amongst employees preferably committed to the cause of women OR who have had experience in social work OR have legal knowledge.
- d) one member from amongst non-governmental organizations or associations committed to the cause of women or a person familiar with the issues relating to sexual harassment.

The Presiding Officer and every member shall hold office for such period, not exceeding 3 (three years), from the date of their nomination as may be specified by the employer.

5. Complaint Mechanism

- i) Any employee who is the recipient of any unwelcome sexual behavior as described by this policy or knows of the occurrence of such harassment to anyone else, is expected to report the same at the earliest.
- j) Complaints must be made in writing so as to enable a formal investigation and enquiry into the matter. Complaints under this Policy may be lodged with any member of the Core Complaints Committee or the Internal Complaints Committee.
- k) In case the employee communicates verbally to his/her Team Manager, HR Manager or any other employee about any incident(s), they are encouraged to forward the complaint in writing to the Complaints Committee. An employee may also email the complaint to: posh@credright.com
- l) Names of the members of the Core Complaints Committee or Internal Complaints Committee along with their contact details are provided in **Annexure A**. The format for the complaint is provided in **Annexure B**.
- m) Anonymous complaints are generally discouraged as details of people involved are essential to the formal investigation process.

Note:

Do NOT publicize an alleged harassment without following the reporting procedures. Any breach of confidentiality will be treated as a separate misconduct complaint. Any questions/clarifications you may have in this regard can be raised with your HR Manager.

6. Conciliation

- a. On a written request from the aggrieved person, the Core Complaints Committee or the Internal Complaints Committee may initiate resolution through conciliation/ mediation.
- b. On the receipt of the Complaint, the Committee shall, within seven working days from the date of receipt of the Complaint, send a copy of the Complaint received from the Aggrieved Person to the Respondent. The Respondent shall file his reply to the Committee along with the names and addresses of the witnesses and supporting documents within a period not exceeding 10 (ten) working days. If conciliation is successful between both parties, the settlement must be noted in writing.

Provided that no monetary settlement shall be made as a basis of conciliation.

7. Inquiry Process

- a) If settlement is not arrived at through conciliation, the Internal Complaints Committee will proceed with an inquiry. The inquiry will be done promptly, thoroughly and with utmost confidentiality, as practically possible.
- b) The Committee shall make an enquiry into the Complaint in accordance with the principles of natural justice.
- c) The Aggrieved Person and the Respondent shall not be allowed to bring in any legal practitioner to represent them in their case at any stage of the proceedings before the Committee.
- d) In conducting the inquiry, a minimum of two members of the Committee including the presiding officer shall be present.
- e) The parties shall, during the course of inquiry, be given an opportunity of being heard and a copy of

the findings shall be made available to both the Aggrieved Person and the Respondent to enable them to make representation against the findings before the Committee.

- f) Inquiry to be conducted in a neutral location which provides an environment conducive for both the Aggrieved Person and the Respondent.
- g) The inquiry shall be completed within a period of ninety days.
- h) The inquiry process and end result will be documented in writing. Those found guilty will be subjected to appropriate disciplinary action. Disciplinary actions for cases of sexual harassment may range from oral/ written warnings to extension of probation, demotion, withholding of increment/ promotion, monetary compensation as appropriate, counselling sessions, and termination from the services of the organization.

8. Disciplinary Action

- a. The Committee shall on completion of the enquiry provide a report of its findings within 10 days from the date of completion of the enquiry and such report shall be made available to the concerned parties.
- b. If the allegation against the respondent has not been proved, the Committee may recommend that no action needs to be taken in the matter.
- c. If the Internal Complaints Committee arrives at the conclusion that the allegation against the respondent has been proved, it shall recommend to:
 - i. Take action for sexual harassment as a misconduct.
 - ii. To tender written apology to the complainant, issue warning, withholding of promotions/ increments of the Respondent.
 - iii. To deduct from salary / wages of the respondent or issue direction for payment; such sum as it may consider appropriate to be paid to the aggrieved person or to their legal heirs, as it may determine.
 - iv. Termination/dismissal from the services of the Company.
 - v. Any other action that the Disciplinary Authority may deem fit.
 - vi. To file a Complaint before the relevant police station/ Court.
- d. Such action will be taken within 60 days of the receipt of report.

9. Malicious or False Accusations

- a) The complaint of sexual harassment made by any employee shall be taken up with utmost seriousness by Company. However, there shall be zero tolerance for any false accusation.
- b) If the Committee comes to a conclusion that the allegation was made with malicious intent or the aggrieved person or any other person making the complaint on behalf of the aggrieved person produced false or forged or misleading documents to prove his/ her case, the Committee may recommend action to be taken against the person who has made the complaint, including termination of service. In such a case, malicious intent has to be established after an inquiry, before any action is recommended. A mere inability to substantiate a complaint or provide adequate proof would not attract action as provided herein. A similar recommendation for taking action would be recommended against any witness whom the Committee concludes, that he/ she has given false evidence or produced forged or misleading documents.

- c) It is to be noted that this statement is not intended to discourage employees from coming forward with any complaints. The Company recognizes and expects that some claims may be difficult to prove or support or may not in fact be found to raise to the level of seriousness deemed necessary to constitute Sexual Harassment. These types of complaints will not be considered to be false accusations.

10. Protection Against Retaliation

- a) Retaliation is a serious violation of this policy and any person found to have retaliated against an individual for reporting harassment will be subject to appropriate disciplinary procedures.
- b) The Company forbids any form of retaliation against anyone who has reported a suspected episode of harassment or has cooperated in any investigation involving a reported case.
- c) If anyone feels that he/she is experiencing retaliation of the nature of intimidation, pressure to withdraw the case or threats for reporting, testifying or otherwise participating in the proceedings, should report the matter to the Committee.
- d) As with complaints of harassment, this too will be treated as misconduct and the Company will take appropriate action to prevent/rectify the retaliation.
- e) Retaliation will be treated as seriously as an alleged case of harassment and will apply even if the original complaint is not proven.

11. Appeal

Any party not satisfied or further aggrieved by the implementation or non-implementation of recommendations made may appeal to the appellate authority in accordance with the Act and rules, within 90 (Ninety) days of the recommendations being communicated.

12. Confidentiality

- a) The Company understands that it is difficult for the victim to come forward with a complaint of sexual harassment and recognizes the victim's interest in keeping the matter confidential.
- b) Information generated in the course of informal reviews and formal investigations necessary for enforcing this Policy will be given the full extent of confidentiality to employee personnel records.
- c) Any person who, without authorization, reveals such information will be subject to disciplinary action.
- d) The sharing of the content of the complaints will be on a "need to know" basis only.

It is understood that sexual harassment is an issue of highly sensitive nature and therefore strict confidentiality will be maintained by the Aggrieved Person, defendant, witnesses, the Committee. The Company will exercise utmost care in ensuring confidentiality of the process, protection of the victim/harassed and treat the entire process with the dignity and merit it deserves.

13. Miscellaneous

- a) The company may make any alteration or amendment or rescind any of the clauses of this Policy as and when it finds it necessary to do so as long as it complies with the Act. Any such alterations or amendment or rescinding will be intimated to the employees.
- b) Nothing contained in these rules shall operate in derogation of any law for the time being in force

- or to the prejudice of any right of any employee under any other Rules or Law.
- c) The Committee shall prepare an annual report with the following details and shall submit the same to the Company to include in its Annual report:
- i. Number of complaints of sexual harassment received during the year.
 - ii. Number of complaints disposed off during the year.
 - iii. Number of cases pending for more than 90 days.
 - iv. Number of workshops or awareness program against sexual harassment carried out;
 - v. Nature of action taken by the employer.

14. Conclusion

In conclusion, the Company reiterates its commitment to providing its employees, a workplace free from harassment/ discrimination and where every employee is treated with dignity and respect.

*Employees can drop all escalations to posh@credright.com

ANNEXURE – A

COMPOSITION OF INTERNAL COMPLAINTS COMMITTEE

SL. NO	Name	Designation	Email ID	Contact Number
1	Vani Bobba	Associate Vice President-HR	vani.bobba@credright.com	7660000766
2	Chitra Thakwani	Company Secretary	chitra.t@credright.com	9681785885
3	Manish Muralidharan	Vice President – Cred & Ops	manish@credright.com	6300947600
4	Shrinkhla Chandok	Udayan Care- Foundation	shrinkla@udayancare.org	9000112295

ANNEXURE – B FORM FOR COMPLAINT

Date

Name, designation & address /victim(s)/aggrieved-

Name, designation & address: of respondent(s):

Complaint:

Signature: