



Sugmya Finance Private Limited

Policy On Sexual Harassment

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Policy Ownership	Human Resource
Functional Aspect Checked By	Vikas Singh & Brajmohan Singh
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Approved By	Board of Directors

1. POLICY STATEMENT

As SUGMYA Group, 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. It is thus in acknowledgement of and consonance with these values, that we are dedicated to ensuring that 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, such as clients, vendors etc. Discrimination and harassment of any type is strictly prohibited. We wish to promote and maintain this culture to ensure that associates of the Company do not engage in practices that are abusive in any form or manner whatsoever.

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.

Violation of this policy will call for strict disciplinary action up to and including termination.

2. ACRONYMS

Term/ Acronym	Explanation
HR	Human Resources
NGO	Non-Governmental Organization
RM	Reporting Manager
HRC	Harassment Redressal Committee

3. APPLICABILITY

This policy applies to all SUGMYA employees (both Men and Women), In-House Consultants, Advisors and Employees including off roll. The policy also extends to those who are not associates of the Company, such as customers, visitors etc., but are subjected to sexual harassment at the premises (defined hereinafter) of the Company. As a policy, it applies to all locations, situations where SUGMYA's business is conducted, all activities run in partnership with us and to all company-sponsored social events.

4. SCOPE

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

i. *Business locations of the Company*

Any external location visited by associates due to or during the course of their employment with the Company such as business locations of other Companies/entities, guest houses etc.

Any mode of transport provided by the Company (or a representative of the Company) for undertaking a journey to and from the afore mentioned locations.

Without any prejudice to the rights of an associate in relation to the above the scope includes, any complaint raised specifically by an associate of the Company due to being subjected to any act of sexual harassment by another associate of the Company at any location, including but not limited to the private residences of the aggrieved associate; or

ii. *In any mode of transport*

5. DEFINITIONS

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

“Sexual Harassment” would also mean:

- i. Quid pro quo sexual harassment, which means something in return or an exchange of one thing for another.
- In the workplace, quid pro quo sexual harassment takes place if sexual favours are asked in exchange for any kind of special treatment on the job. Threatening an associate if he/she does not consent to such sexual advances or favours also amounts to sexual harassment. The act of ‘asking’ may either be verbal or implied and the ‘sexual conduct’ may be verbal or physical. But, in either case, it must be unwelcome.

For e.g.: Direct or implied requests or offers by any associate for sexual favours in exchange for actual or promised job benefits such as favourable reviews, salary increases, promotions, increased benefits, or continued employment constitutes sexual harassment.

- ii. Hostile work environment includes.

- Hostile environment sexual harassment occurs when either speech or conduct of a sexual nature takes place, and is seen or perceived as offensive and interferes with the work performance of the recipient, or any one or more associates
- Hostile environment sexual harassment may also include intimidating or harassing conduct that is directed at an individual, or a group of individuals
- It will also mean related retaliation which includes marginalizing someone in the workplace with regard to his / her roles and responsibilities, socially ostracizing, intimidating someone physically, psychologically, and emotionally or someone close to or related to the victim

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.

Sexual harassment can involve one or more incidents and actions constituting harassment may be physical, verbal and non-verbal. Examples of conduct or behavior which constitute sexual harassment include, but are not limited to:

PHYSICAL CONDUCT

- Unwelcome physical contact including patting, pinching, stroking, kissing, hugging, fondling, or inappropriate touching
- Physical violence, including sexual assault
- Physical contact, e.g. touching, pinching
- The use of job-related threats or rewards to solicit sexual favors

VERBAL CONDUCT

- Comments on a worker's appearance, age, private life, etc.
- Sexual comments, stories and jokes, coloured remarks
- Sexual advances
- Repeated and unwanted social invitations for dates or physical intimacy
- Insults based on the sex of the worker
- Condescending or paternalistic remarks
- Sending sexually explicit messages (by phone or by email)

NON – VERBAL CONDUCT

- Display of sexually explicit or suggestive material
- Sexually suggestive gestures
- Whistling
- Leering

Anyone can be a victim of sexual harassment, regardless of their sex and of the sex of the harasser. SUGMYA recognizes that sexual harassment may also occur between people of the same sex. What matters is that the sexual conduct is unwanted and unwelcome by the person against whom the conduct is directed.

SUGMYA recognizes that sexual harassment is a manifestation of power relationships and often occurs within unequal relationships in the workplace, for example between manager or supervisor and employee.

Anyone, including employees of SUGMYA, clients, customers, casual workers, contractors or visitors who sexually harasses another will be reprimanded in accordance with this internal policy.

All sexual harassment is prohibited whether it takes place within the group premises or outside, including at social events, business trips, training sessions or conferences sponsored by the group.

6. HARASSMENT REDRESSAL COMMITTEE (HRC)/INTERNAL COMMITTEE

The Company will have a centralized Harassment Redressal Committee (“HRC/Committee”) to specifically address any complaints of sexual harassment. The HRC will be nominated by the appropriate functional Head HR and would be headed by a woman associate. Not less than half of the members would be women and the committee would also include a member from a NGO or a person familiar with the issues relating to sexual harassment (hereinafter referred to as ‘outside representative’). While the centrally nominated members and the outside representative will review all cases of sexual harassment reported within the Company, on case to case basis, respective unit HR representatives would also be involved.

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

- Common Info mailers
- Floating Articles on the same, from time to time

The Chairperson and every Member of the Committee shall hold office for a period not exceeding three years, from the date of their nomination.

The committee members, unit HR representatives and reporting managers will be provided necessary training inputs to handle such issues effectively and with the required sensitivity and concern.

HRC will comprise of the following members:

S.No.	Particulars	Role
1	Sarika Bhatiani	Presiding Officer/ HEAD
2	Shikha Gangwar	Member
3	Abhishek Kumar	Member
4	Praveen Kr. Verma	Member
5	Sanchiyta Narula	Outside Representative as per Chapter II of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013

The Committee is responsible for:

- Investigating every formal written complaint of sexual harassment
- Taking appropriate remedial measures to respond to any substantiated allegations of sexual harassment
- Discouraging and preventing employment-related sexual harassment
 - Committee to act as neutral identity and no biasness will be acceptable.

GENERAL INSTRUCTIONS:

Any information relating to conciliation and inquiry proceedings, recommendations of the Committee and the action taken shall not be published, communicated, or made known to the public, press /media in any manner.

Where any person entrusted with the duty to handle or deal with the complaint, inquiry or any recommendations or action to be taken, contravenes, he/she shall be liable for action as per the company's disciplinary policy.

7. PROCEDURES FOR RESOLUTION, SETTLEMENT OR PROSECUTION OF ACTS OF SEXUAL HARASSMENT:

The Company is committed to providing a supportive environment to resolve concerns of sexual harassment as under:

A. INFORMAL RESOLUTION OPTIONS:

When an incident of sexual harassment occurs, the victim of such conduct can communicate their disapproval and objections immediately to the harasser and request the harasser to behave decently.

If the harassment does not stop or if victim is not comfortable with addressing the harasser directly, the victim can bring their concern to the attention of the HRC for redressal of their grievances. The Committee will thereafter provide advice or extend support as requested and will undertake prompt investigation to resolve the matter.

B. COMPLAINTS:

1. An employee with a harassment concern(s), who is not satisfied with the informal resolution options or has exhausted such options without any result, preventing recurrence of concerns, may make a formal complaint to the Presiding Officer of the HRC. The complaint shall have to be in writing and can be in form of a letter, preferably within 15 days from the date of occurrence of the alleged incident, sent in a sealed envelope. Alternately, the employee can send complaint through an email. The employee is required to disclose their name, department, division and location they are working in, to enable the Presiding Officer to contact them and take the matter forward.

2. The Presiding Officer of HRC will proceed to determine whether the allegations (assuming them to be true only for the purpose of this determination) made in the complaint fall under the purview of Sexual Harassment, preferably within 30 days from receipt of the complaint.

In the event, the allegation does not fall under the purview of Sexual Harassment or the allegation does not constitute an offence of Sexual Harassment, the Presiding Officer will record this finding with reasons and communicate the same to the complainant.

3. If the Presiding Officer determines that the allegations constitute an act of sexual harassment, he/ she will proceed to investigate the allegation with the assistance of the HRC as follows:

- interview the victim and the alleged harasser separately
- interview other relevant third parties separately
- decide whether or not the incident(s) of sexual harassment took place
- produce a report detailing the investigations, findings and any recommendations
- if the harassment took place, decide what the appropriate remedy for the victim is, in consultation with the victim (i.e.- an apology, a change to working arrangements, a promotion if the victim was demoted as a result of the harassment, training for the harasser, discipline, suspension, dismissal)
- follow up to ensure that the recommendations are implemented, that the behavior has stopped and that the victim is satisfied with the outcome

- if it cannot determine that the harassment took place, he/she may still make recommendations to ensure proper functioning of the workplace
- keep a record of all actions taken
- ensure that the all records concerning the matter are kept confidential
- ensure that the process is done as quickly as possible and in any event within 90 days of the complaint being made

4. Where such conduct, on the part of the accused, amounts to a specific offence under the law, the Company shall initiate appropriate action in accordance with law by making a complaint with the appropriate authority.

5. The HRC shall conduct such investigations in a timely manner and shall submit a written report containing the findings and recommendations to the Chairman & Managing Director as soon as practically possible and in any case, not later than 90 days from the date of receipt of the complaint for the corrective actions as given below:

Corrective action may include any of the following:

- Formal apology
- Counselling
- Written warning to the perpetrator and a copy of it maintained in the employee's file.
- Change of work assignment / transfer for either the perpetrator or the victim.

Suspension or termination of services of the employee found guilty of the offence

6. In case the complaint is found to be false, the Complainant shall, if deemed fit, be liable for appropriate disciplinary action by the Management.

8. CONFIDENTIALITY

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.

To protect the interest of the victim, the accused person and others who may report incidents of sexual harassment, confidentiality will be maintained throughout the investigatory process to the extent practicable and appropriate under the circumstances.

9. ACCESS TO REPORTS AND DOCUMENTS

All records of complaints, including contents of meetings, results of investigations and other relevant material will be kept confidential by the Company except where disclosure is required under disciplinary or other remedial processes.

10. PROTECTION TO COMPLAINANT/VICTIM

The Company is committed to ensuring that no employee who brings forward a harassment concern is subject to any form of reprisal. Any reprisal will be subjected to disciplinary action.

The Company will ensure that the victim or witnesses are not victimized or discriminated against while dealing with complaints of sexual harassment. However, anyone who abuses the procedure (for

example, by maliciously putting an allegation knowing it to be untrue) will be subjected to disciplinary action.

11. IMPLEMENTATION

The names of the above members will be circulated from time to time. The registration of the complaint could be through e-mail to sarika.bhatiani@sufinn.com or by way of a written complaint.

SUGMYA will ensure that this policy is widely disseminated to all relevant persons. It will be included in the staff handbook. All new employees must be trained on the content of this policy as part of their induction into the company.

It is the responsibility of every manager to ensure that all his/her employees are aware of the policy.

12. SEXUAL HARASSMENT AND CLIENT/PARTNERS

The Company encourages its clients/partners to have a commitment to a sexual harassment free working atmosphere within their Companies. The Company may play a facilitating role in redressal of complaints of sexual harassment in such circumstances.

13. RESPONSIBILITY OF ASSOCIATES:

The below is only an indicative list of basic Do's and Don'ts and is in no way intended to be construed as an exhaustive list.

Do's

- Know SUGMYA's Prevention of Sexual Harassment Policy
- Be aware of inappropriate behaviours and avoid the same
- Say "NO" if asked to go to places, do things or participate in situations that make you uncomfortable.
- Trust your instincts. Walk away from uncomfortable situations.
- Say "NO" to offensive behaviour as soon as it occurs.
- Refrain from taking discriminatory actions or decisions which are contrary to the spirit of this policy.
- Maintain confidentiality regarding any aspect of an inquiry to which they may be party to.

Don'ts

Verbal harassment:

- Sexually suggestive comments or comments on physical attributes
- Offensive language that insults or demeans a colleague, using terms of endearment
- Singing or humming vulgar songs
- Requests for sexual favours, sexual advances, coerced acts of a sexual nature
- Requests for dates or repeated pressure for social contact
- Discussing sexual activities, sexual prowess or intruding on the privacy of an associates
- Sexually coloured propositions, insults or threats

- Graffiti in the office premises

Nonverbal harassment:

- Offensive gestures, staring, leering or whistling with the intention to discomfort another.
- Even if not directly done to a particular individual, uttering a word, making a gesture or exhibiting any object with the intention that such word, gesture, or object be heard or seen by associates.

14. HANDLING DEVIATION TO THE POLICY

The HR Head should examine any deviation to this policy at the first level and then take approval from the CEO & Co-founder /Director.

15. 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.

IMPORTANT NOTE:

Review of this policy would be undertaken annually and will be subject to approval by the Board / Any change in document by way of additions and amendments due to changes in laws, regulations, accounting standards etc., would follow changes Management process and adequate version control.



Director



Presiding Officer