



Policy on Sexual Harassment of Women at Workplace
(Prevention, Prohibition and Redressal)

1. Applicability

- 1.1. This policy is applicable to all women “employee” of Infina Finance Private Limited.
- 1.2. This policy is in line with the provisions under The Sexual Harassment of Women at Workplace (Prevention, Prohibition & Redressal) Act, 2013 (hereinafter referred to as SHW Act) and Rules framed thereunder from time to time.

2. Definitions/Abbreviations:- In this Policy document, the words and expressions listed below shall have the following meanings:-

- 2.1. AW– Aggrieved Woman: Refers to any woman “employee” who has lodged a complaint of sexual harassment at workplace.
- 2.2. RP – Respondent Person: Refers to any “employee” against whom the complaint has been lodged by AW.
- 2.3. Workplace – includes all offices and branches in India. It also includes any place visited or arising out of or during the course of employment/work including transportation provided by the organisation for undertaking the journey.
- 2.4. Employee – the word “employee” used herein is to be strictly interpreted in terms of and provision of the SHW Act.
- 2.5. Sexual Harassment - The definition of sexual harassment will be as defined in section 2 (n) of SHW Act as represented below:-
 - 2.5.1. “Sexual Harassment” includes any one or more of the following unwelcome acts or behaviour (whether directly or by implication) namely;-
 - 2.5.1.1. Physical contact and advances; or
 - 2.5.1.2. A demand or request for sexual favours; or
 - 2.5.1.3. Making sexually coloured remarks; or
 - 2.5.1.4. Showing pornography; or
 - 2.5.1.5. Any other unwelcome physical, verbal or non-verbal conduct of sexual nature.

2.5.2. The following circumstances, among other circumstances, if it occurs, or is present, in relation to or connected with any act or behaviour of sexual harassment (as defined and enumerated in clause 2.5.) will also amount to sexual harassment:

2.5.2.1. Implied or explicit promise of preferential treatment in her employment; or

2.5.2.2. Implied or explicit threat of detrimental treatment in her employment; or

2.5.2.3. Implied or explicit threat about her present or future employment status; or

2.5.2.4. Interference with her work or creating an intimidating or offensive or hostile work environment for her; or

2.5.2.5. Humiliating treatment likely to affect her health or safety.

2.6. Appropriate Authority- This would mean the prevention of sexual harassment committee (SHC) being constituted under this policy, who will work independently on all complaints referred under this policy. The committee members shall consist of the following members :

Gauri Bhatkal - being designated as the "Chairperson" (under Policy on Sexual Harassment of Women at workplace (Prevention, Prohibition and Redressal)".

Jaimin Bhatt - Director

R Venkatsubramanian - CEO

N R Subramanian - CFO

**Rumilda Miranda - Sec. to CEO

3. Procedure for filing a Complaint-

3.1. In the event of occurrence of circumstances under this policy, the AW can lodge a complaint to the Appropriate Authority in writing. At the time of filing the complaint, AW shall submit six (6) copies of the complaint along with supporting documents and names and addresses of the witnesses.

3.2. The complaint should be made by AW within a period of three months from the date of occurrence of incident and in case of a series of incidents, within a period of three months from the date of the last incident.

** Appointed w.e.f. October 7, 2016 in place of Ms. Harshita Nair, Member of the Committee, who ceased to be employee of the Company w.e.f. September 23, 2016

- 3.2.1. The appropriate authority may, for the reasons to be recorded in writing, extend the time limit for making a complaint by three months, if it is satisfied that the circumstances were such which prevented the AW from filing a complaint within the said period

4. Process to be followed by SHC on receipt of Complaint

- 4.1. The details of the process and procedure to be followed post receipt of complaint including the timelines for completion of various stages are outlined in "Annexure 1".
- 4.2. On receipt of the complaint, the SHC would initiate preliminary enquiry to evaluate if there is a prima facie case or not.
 - 4.2.1. The SHC shall keep in mind that the AW is not subject to inquiry more than once. However, if the case complexity requires that the AW has to be called for more than once for inquiry, then utmost sensitivity should be displayed and adequate protection should be taken to ensure that there is no loss of dignity to the AW.
- 4.3. Post establishing a prima facie case, the SHC will seek explanation in writing from RP after providing him the copy of the complaint.
- 4.4. Post receipt of the reply from RP, the SHC may, before initiating an inquiry and at the request of the AW, take steps to settle the matter between the AW and the RP, through conciliation, provided that no monetary settlement shall be made as a basis of conciliation. (Pls refer to Clause 5 on Guidelines for Conciliation)
- 4.5. If conciliation fails, or if AW or RP insist for enquiry, then the SHC will initiate a detailed inquiry and submit the inquiry report with its recommendations.
- 4.6. For deciding the recommendations, the SHC would take help of the guidelines as detailed in the Disciplinary Action Grid (attached in "Annexure 3").

5. Guidelines for Conciliation:-

- 5.1. Where a settlement has been arrived during conciliation, the SHC shall record the settlement so arrived.
- 5.2. No further inquiry shall be conducted by the SHC post conciliation.
- 5.3. However, if the terms arrived during conciliation has not been complied with by the RP, the SHC shall proceed to make an inquiry into the complaint or, as the case maybe, forward the complaint to the police.
- 5.4. The copies of the settlement as recorded during conciliation shall be provided to both the parties.

6. Guidelines for SHC

- 6.1. Where the AW is unable to make a complaint on account of her death or otherwise, her legal heir may make a complaint under this section.
- 6.2. The SHC shall have the right to terminate the inquiry proceedings or to give an ex-parte decision on the complaint, if the AW or RP fails (as the case may be) to be present for three (3) consecutive hearings without giving a sufficient cause.
 - 6.2.1. The SHC before passing such a decision has to give a notice in writing of fifteen (15) days in advance to the concerned parties (RP or AW).
- 6.3. During the pendency of an inquiry, on a written request by the AW, the SHC may recommend one of the following (the decision of SHC on this would be final and binding):-
 - 6.3.1. Transfer of the AW/RP to any other branch or location or department. OR
 - 6.3.2. Grant leave to the AW on a case to case basis but not exceeding three (3) months. This leave would be over and above the normal eligibility of the AW as per her Privilege Leave entitlement,. OR
 - 6.3.3. Grant any other relief to AW, which the SHC may feel necessary.
- 6.4. Where the SHC arrives at a conclusion that the allegation against the RP is malicious or the AW has made the complaint knowing it to be false or the AW has produced forged or misleading documents, it may recommend to take action against the AW in accordance with the provisions of Disciplinary Action Grid as detailed in "Annexure 3".
 - 6.4.1. A mere inability to substantiate a complaint or provide adequate proof need not attract action against the AW.
- 6.5. No party shall be allowed to bring in any legal practitioner to represent them in their case at any stage of the proceedings before the SHC.
- 6.6. Where the SHC arrives at a conclusion that during the inquiry any witness has given false evidence or produced any forged or misleading documents, it may direct the concerned Business Head to take suitable action.



7. Role of HR–

7.1. The HR Compliance Team will work under the directions of SHC to provide all the necessary support including the following activities:-

7.1.1. Execute the actions as ordered by the SHC.

7.1.2. The annual report is filed with the District Officer as per the format applicable (“Annexure 4”).

7.1.3. Display at conspicuous places the details of policy and SHC members.

7.1.4. Create awareness on sexual harassment

Annexure 1

Under Policy on Sexual Harassment of Women at workplace (Prevention, Prohibition and Redressal)”

Procedure to be followed post filing of the complaint including the Timelines:

Step	Action	Time Period	For reference (time lines considering the complaint received as Day 0)
1	The AW should lodge a complaint to the SHC in writing with six (6) copies of the complaint along with supporting documents and names and addresses of the witnesses The complaint should be send either by post or email or given in person to a member of the SHC or any other employee authorised by the SHC in writing. For reference the email ids of the SHC would be as below:- shw@infina.in	Within three (3) months from the date of the incident.	Day 0
2	Post evaluation of the complaint and establishment of prima facie case, the SHC to seek explanation in writing from RP and also ask to submit his list of documents and names and addresses of witnesses which he would produce during the inquiry.	Within a period of seven (7) working days from receipt of the complaint from AW, i.e. 7 days from Step 1	Day 7
3	RP to revert on the above showcause as specified in Step 2.	Within ten (10) working days from the receipt of the showcause, i.e. 10 days from Step 2	Day 17
4 a	Post receipt of the reply from RP and evaluating the complaint from AW, the SHC may, before initiating an inquiry and at the request of the AW, take steps to settle the matter between her and the RP through conciliation, provided that no monetary settlement shall be made as a basis of conciliation.	Within 90 days of the complaint being filed by the AW., i.e 90 days from Step 1	Day 90
4 b	SHC to initiate and complete enquiry.		
5	SHC to submit the inquiry report of findings and recommendations and start implementation.	Within 10 days of the completion of the inquiry. i.e 10 days from Step 4	Day 100

6	<p>The SHC will communicate the final action to the HR Compliance team for execution.</p> <p>The HR Compliance Team under instruction of the SHC would also forward a copy of the final report to the AW and RP.</p>	<p>Within 60 days of the receipt, i.e. 60 days from Step 5.</p>	<p>Day 160</p>
7	<p>AW/RP to file appeal to a court or tribunal against recommendations or non-implementation of recommendations of the SHC.</p>	<p>Within 90 days of the receipt of the decision of the SHC communicated by the HR Compliance team i.e. within 90 days from Step 6.</p>	<p>Day 250</p>

Note: - Step 6 and 7 can proceed simultaneously.

If the day on which any action required to be done is a non-working day/public holiday, then the said action shall be done on the next succeeding working day. For the said purposes “working day” means a day (other than a Saturday or Sunday or any public holiday).

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Annexure 2

Under Policy on Sexual Harassment of Women at workplace (Prevention, Prohibition and Redressal)”

Notice to All Employees

Sexual Harassment Complaints Committee (hereinafter referred to as SHC) – this is a committee which is constituted to investigate cases of complaints of sexual harassment.

- ✓ Members of the SHC (as nominated by the Board)

Name	Role	Email ID	Tel
Ms. Gauri Bhatkal	Chairperson	gauri.bhatkal@phoenixarc.co.in	022-67413795
**Ms. Rumilda Miranda – Sec. to CEO	Member	rumilda.miranda@infina.in	022-66922078
Mr. Jaimin Bhatt	Member	shw@infina.in	022-61661600
Mr. R Venkatsubramanian - CEO	Member	venkat.sr@infina.in	022-66922076
Mr. N R Subramanian - CFO	Member	nr.subramanian@infina.in	022-66717672

- ✓ Every Member of the SHC shall hold office for a period not exceeding three years, from the date of their nomination and are eligible for re-appointment.

Signed

Chairperson of Steering Board under Policy on Sexual Harassment of Women at workplace (Prevention, Prohibition and Redressal)

** Appointed w.e.f. October 7, 2016 in place of Ms. Harshita Nair, Member of the Committee, who ceased to be employee of the Company w.e.f. September 23, 2016