

**POLICY ON PREVENTION AND REDRESSAL OF SEXUAL HARASSMENT OF
WOMEN AT WORKPLACE IN HDFC CREDILA FINANCIAL SERVICES LTD.
(Formerly known as HDFC Credila Financial Services Private Limited) (HDFC Credila)**

Last revision Date: October 20, 2021

Last Reviewed by the Board in Annual Review: April 17, 2023

The SEXUAL HARASSMENT OF WOMEN AT WORKPLACE (PREVENTION, PROHIBITION AND REDRESSAL) ACT, 2013 (hereinafter referred to as “the Act”) was enacted and came into force with effect from 09.12.2013 to provide:

- 1) Safety and security against sexual harassment of women at workplace.
- 2) Protection to women from their rights of discrimination on the basis of gender and allow them to work with dignity and in safe environment and free from sexual harassment.
- 3) Specific machinery for prevention, prohibition and redressal of their complaints and to enforce their rights under the Act.

HDFC Credila has set out Sexual Harassment Policy for the compliance of the provisions of the Act and Rules made thereunder.

The policy shall be reviewed annually and as and when required.

A. Objective of the Policy:

HDFC Credila has been providing an equal employment opportunity to women and is committed to ensure that all its women employees work in a conducive and healthy working environment, free from harassment, intimidation or offensive behavior.

HDFC Credila is committed to take all necessary steps to ensure that its women employees are not subjected to any form of harassment at work place and provide a mechanism to enforce their rights without fear of reprisal.

This policy is drawn from the Sexual Harassment of Women at work place (Prevention, Prohibition and Redressal) Act, 2013 and for any unintentional omission, the Act would apply.

B. Scope of the Policy :

This Policy applies to all employees of HDFC Credila, including permanent, temporary, trainees and employees at its workplace. HDFC Credila will also initiate proceedings under this Act if a complaint of sexual harassment is made involving its business associates.

C. Definitions :

- a) “Aggrieved woman” means in relation to a workplace, a woman, of any age who alleges to have been subjected to any act of sexual harassment by the respondent;
- b) “Employee” means a person employed at a workplace for any work on regular, temporary, ad hoc or daily wage basis, and includes a co-worker, probationer, trainee or, apprentice.
- c) “Internal committee” means an Internal Complaints Committee constituted by HDFC Credila;
- d) “Member” means a member of the Internal Complaints Committee / Regional Complaints Committee;
- e) “Presiding Officer“ means the Presiding Officer of the Internal Complaints Committee;
- f) “Respondent” means a person against whom the aggrieved woman has made a complaint;
- g) “Sexual harassment” includes any one or more of the following unwelcomed acts or behavior (whether directly or by implication) namely :-
 - (i) physical contact and advances; or
 - (ii) a demand or request for sexual favours; or
 - (iii) making sexually colored remarks; or
 - (iv) showing pornography; or
 - (v) any other unwelcome physical, verbal or non-verbal conduct of sexual nature
 - (vi) In addition, if there are following circumstances along with or apart from, it shall also amount to sexual harassment:
 - a) implied or explicit promise of preferential treatment in her employment; or
 - b) implied or explicit threat of detrimental treatment in her employment; or
 - c) implied or explicit threat about her present and future employment status; or
 - d) creating an intimidating or offensive or work environment for her; or
- h) “workplace” means and includes:
 - a) all offices or other premises of HDFC Credila where the business is conducted
 - b) where the conduct or comments may have an adverse impact on the work place or work place relations

D. Complaint Mechanism

An Internal Complaints Committee (ICC) is constituted to redress complaints pertaining to sexual harassment of women employee. Any complaint which is received by the Committee will be dealt with appropriately, sensitively and confidentially in the most judicious and unbiased manner within the time frame as provided in the Act.

E. Constitution of Internal Complaints Committee (ICC):

The Act stipulates that the ICC will comprise of (I) a senior level woman employee as the presiding officer, (II) two other employees committed to the cause of women or having legal knowledge or social work experience (III) a member from an NGO or familiar with issues relating to sexual harassment. It is also provided that one half of the total members of the ICC shall be women.

Accordingly, the Internal Complaints Committee at HDFC Credila comprises of the following members:

S. No.	Name	Post
1	Ms. Supriya Bhasin	Presiding officer
2	Ms. Aastha Sachdeva	Member
3	Ms. Manasi Panse	Member
4	Ms. Emema Victor	Member
5	Mr. Satendra Singh	Member
6	Mr. Moorthy Raju	Member
7	Mr Amit Bihani	Member
8	Mr Rajesh Kalaskar	Member
9	Mr. Abhinay Vyas	Member
10	Ms. Deepa Rashinkar	Member
11	Ms. Manju Malkani	External Member

Ms Natasha Raj, Head HR will be the permanent invitee to the Committee.

To ensure confidentiality, a special email id Cfsplicc@hdfccredila.com has been created. Any aggrieved woman can send complaints relating to sexual harassment to this email id, which could be accessed only by members of the ICC.

F. Redressal Procedure:

a) Informal Resolution Option:

- i. When an incident of Sexual Harassment occurs, the victim of such conduct can communicate her disapproval and objections immediately to the harasser and request the harasser to behave decently.
- ii. If the harassment does not stop or if the victim is not comfortable with addressing the harasser directly, she can bring her concern to the attention of the respective Complaints Committee for redressal of her grievances. The complaint committee will thereafter provide advice or extend support as requested and will undertake prompt investigation to resolve the matter.

b) Complaints in writing:

Any aggrieved woman who is not comfortable with the informal resolution option or has exhausted such option can make a complaint in writing, of the sexual harassment to the respective Committee within a period of three months from the date of incident and in case of series of incidents, within a period of three months from the date of last incident.

Where such complaint cannot be made in writing, the Presiding Officer or any member of the Committee will render all the reasonable assistance to the aggrieved woman for making the complaint in writing.

The respective Committee, for the reasons recorded in writing, can extend the time limit not exceeding three months, if it is satisfied that the circumstances were such which prevented the aggrieved woman from filing a complaint within the said period.

c) Conciliation:

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

Where a settlement has been arrived at, the Committee will record the settlement so arrived and forward the same to Head – HRD, HDFC Credila for necessary records.

The respective Committee will provide the copies of the settlement as recorded to the aggrieved woman and the respondent. Where a settlement is arrived at, no further inquiry will be conducted by the respective Committee.

G. Inquiry into complaint:

Where the aggrieved woman informs the respective Committee that any term or condition of the settlement arrived at during the conciliation process has not been complied with by the respondent, the respective Committee will proceed to make an inquiry into the complaint.

- a) Where the respondent is HDFC Credila employee: The respective Committee will proceed to make inquiry into the complaint. One copy of the complaint will be sent to the respondent within fifteen working days. The respondent will file his reply to the complaint, within thirty working days.
- b) Where the respondent is not HDFC Credila employee: The respective Committee will proceed to make inquiry into the complaint. The respective Committee will send one copy of the complaint to the respondent within fifteen working days. The respective Committee will also initiate appropriate action for the time being in force, if required.
- c) Where both the parties are HDFC Credila employees, the parties will be given an opportunity of being heard and a copy of the findings will be made available to both the parties enabling them to make representation against the findings before the committee.
- d) The respective Committee will make enquiry into the complaint in accordance with the established principles of natural justice.
- e) For the purpose of making the inquiry, the respective Committee will have the powers in respect of the following matters namely :
 - i. summoning and enforcing the attendance of any person and examining him
 - ii. requiring the delivery and production of documents; and

- iii. any other matter which may be prescribed.
- f) The inquiry will be completed within a period of 90 days from the date of receipt of complaint in writing.
- g) At any stage of the inquiry, legal practitioners will not be allowed to represent for any of the parties.
- h) During the inquiry, a minimum of five members of the Committee including the Presiding Officer will be present.
- i) The inquiry will be held at a place which is as practical as possible.

H. Action during pendency of inquiry :

During the pendency of an inquiry, on a written request made by the aggrieved woman, the ICC, if found justified, may recommend to HDFC Credila any of the following:

- a. transfer the aggrieved woman or the respondent to any other workplace,
- b. grant leave to the aggrieved woman up to a period of three months,
The leave granted to the aggrieved woman will be in addition to the leave she would be otherwise entitled.
- c. grant such other relief to the aggrieved woman as may be prescribed,
- d. Restraining the respondent from reporting on the work performance of the aggrieved woman or writing her confidential report.

On the recommendation of the respective Committee, HDFC Credila will implement the recommendation and send the report of such implementation to the respective Committee within a period of thirty days from the date of recommendation.

I. Inquiry Report:

- a) On the completion of an inquiry, the respective Committee will provide a report of its findings to HDFC Credila within a period of thirtydays from the date of completion of the inquiry and such report would be made available to the concerned parties.
- b) Where the respective Committee arrives at the conclusion that the allegation against the respondent has not been proved, it will recommend to HDFC Credila that no action is required to be taken in the matter.
- c) Where the respective Committee arrives at the conclusion that the allegation against the respondent has been proved, it will recommend any of the following corrective action/actions to the employer :
 - i. Formal written apology
 - ii. Counseling the respondent
 - iii. Written warning to the respondent with a copy of the warning to be maintained in the respondent's file

- iv. Change of work assignment/transfer of the respondent or the aggrieved woman
- v. Withholding of promotion/pay rise or increments
- vi. Demotion to a lower grade
- vii. Suspension / termination of services of the respondent
- viii. Deduct from the salary or wages of the respondent such sum as it may consider appropriate so as to compensate the aggrieved woman or to her legal heirs. The amount of compensation will be determined based on the following factors :

- a) Mental trauma, pain, suffering and emotional distress
- b) Medical expenses
- c) Income and financial status of the respondent
- d) Feasibility of payment and
- e) The loss in the career opportunity due to the incident

In case HDFC Credila is unable to make such deduction from the salary of the respondent due to his being absent from duty or cessation of employment, HDFC Credila may direct the respondent to pay such sum to the aggrieved woman;

- d) The respective Committee will have the right to terminate the enquiry proceedings or to give an *ex-parte* decision on the complaint, if the aggrieved woman or the respondent fails to present herself or himself, for three consecutive hearings convened by the presiding officer. Provided however that such *ex-parte* decision will not be passed without giving a notice in writing, fifteen days in advance, to the concerned party(s).
- e) Where the respective Committee arrives at the conclusion that the allegation against the respondent are not proved, the ICC will not recommend any action to be taken by HDFC Credila.

J. In case the complaint is found to be false or malicious :

Where the ICC arrives at a conclusion that the allegation against the respondent is malicious or the aggrieved woman/any other person making the complaint has made the complaint knowing it to be false or the aggrieved woman/any other person making the complaint has produced any forged or misleading document, it may recommend HDFC Credila to take any action against the aggrieved woman/any other person making the complaint including:

- i. Issue a warning; reprimand or censure
- ii. Instruct the complainant(s) to undergo a counseling session
- iii. Withhold the promotion
- iv. Withhold the pay rise or increments
- v. Terminate the services

K. Confidentiality:

- a) To protect the interests of the aggrieved woman and others who may report incidents of sexual harassment, confidentiality will be maintained throughout any investigation process to the extent practicable and appropriate under the circumstances.

- b) All records of complaints including contents of meetings, results of investigation and other relevant material will be kept confidential by HDFC Credila, except where disclosure is required under disciplinary process.

HDFC Credila will be entitled to recover a sum of Rs.2,000/- from any person who contravenes the confidentiality.

L. Annual report :

The Presiding Officer, will prepare an annual report and submit the same to the Company in the prescribed format in Annexure A

M. Sensitisation / Training

The above policy will be put in the internal communication forum. In addition, the policy will form a part of all training programmes for employees.

N. Undertaking/Declaration by Employees

The Employees of the Company shall provide an undertaking in the format as provided in Annexure B

Annexure A

Report of the committee in respect of Complaints received during the year under the year under the Sexual Harassment of Women at Workplace (Prevention, Prohibition And Redressal) Act, 2013 and Rules framed there under as per Section 21 of the Act:

To,

HDFC Credila Financial Services Limited,

Annual Report for the year _____ Under Section 21 of Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013

A. No. of Complaints received during the year: _____

B. No. of Complaints disposed off during the years: _____

C. No. of Cases pending for more than 90 days: _____

D. No of Workshops or Awareness Programmes: _____

Against Sexual Harassment carried out:

Nature of Action taken by the employer: (See Annexure)

Annexure:

The following action was taken by employer in respect of the complaints received during the Year: _____

No. of complaints during the year investigated and completed by the Committee: _____

Action Taken: _____

Authorised Signatory

Annexure B

DECLARATION BY THE EMPLOYEE

I, Mr./Ms. _____ Employee of HDFC Credila Financial Services Limited, appointed as _____ (Designation), _____ (Department) at _____ branch hereby declare that I have read the following company policy and I adhere by the same and I hereby confirm that I have appeared for the online tests conducted by our company.

List of Company policy:

1. Policy on Prevention and Redressal of Sexual Harassment of Women at Workplace.

I hereby confirm that I abide by the terms and conditions of the aforesaid policy and will be solely responsible for any acts conducted by me.

Signature of the Employee _____

Date: _____

Place: _____