

2022



SPANDANA

POLICY ON PREVENTION OF SEXUAL HARASSMENT AT WORK PLACE (POSH)

Version 1.0

Date: 25th July 2022



CONTENTS

I. PURPOSE..... 2

II. SCOPE..... 2

III. POLICY 2

IV. DEFINITIONS..... 2

V. INTERNAL COMPLAINT COMMITTEE:..... 3

VI. PROCEDURE FOR FILING A COMPLAINT 3

VII. PROCESS TO BE FOLLOWED BY INTERNAL COMPLAINT COMMITTEE 4

VIII. FALSE/MALICIOUS COMPLAINT AND FALSE EVIDENCE 4

IX. DETERMINATION OF COMPENSATIONS:..... 4

X. DETAILS OF INTERNAL COMPLAINT COMMITTEE MEMBERS: 5

 AMENDMENTS & DISCLAIMER: 5

XI. ANNEXURE 1 6



I. PURPOSE

- a) To protect against sexual harassment of women at the workplace and for the prevention and redressal of complaints of sexual harassment and matters connected therewith or incidental thereto.
- b) To comply with THE SEXUAL HARASSMENT OF WOMEN AT WORKPLACE (PREVENTION, PROHIBITION, AND REDRESSAL) Act, 2013

II. SCOPE

- a) All employees, agents, partners, vendors and consultants working for the company

III. POLICY

- a) The company is committed to creating a workplace where all employees of the Company, no matter what they are designated, can feel at ease with all other employees of the Company and can work effectively and professionally.
- b) The Company recognizes that protection against sexual harassment and the right to work with dignity are fundamental human rights available to all the employees of the Company.

IV. DEFINITIONS

- **Work Place:** It includes all places of work including Branch Offices, Regional Offices, Zonal Offices, Head Office, and any other establishments of the company It also includes places not just the physical premises under the supervision of the company, but even areas in and outside office premises i.e., any place visited by the employee arising out of or during employment. Including transportation provided by the employer for undertaking such a journey.
- **Sexual Harassment:** It includes any one or more of the following unwelcome acts or behaviour (whether directly or by implication) namely: —
 - Physical contact and advances; or
 - Demand or request for sexual favour; or
 - Making sexually coloured remarks; or
 - Showing pornography or
 - Any other unwelcome physical, verbal or non-verbal conduct of sexual nature.



V. INTERNAL COMPLAINT COMMITTEE:

- a) An Internal Complaint Committee (“Committee”) shall be set up to address any complaints of workplace harassment by the company. The Committee shall consist of the following members:
- b) Presiding Officer shall be a woman of the cadre of Vice President or above from amongst the employees.
- c) One member shall be from HR Department and another Member from Legal Department among these two at least one must be a female member.
- 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 including a social worker with at least 5 years’ experience in the relevant field or a person familiar with labour, service, civil or criminal law.
- e) Provided that at least one-half of the total members so nominated shall be women.
- f) The Presiding Officer and every member of the Internal Committee can hold office for a period not exceeding three years, from the date of their nomination.
- g) The Internal Committee enjoys certain judicial powers in enforcing the attendance of witnesses or submission of documents.

VI. PROCEDURE FOR FILING A COMPLAINT

- a) A complaint of sexual harassment at the workplace must be made by the Aggrieved Woman in writing to the internal committee within three months from the date of occurrence of an incident. In case of a series of an incident, within three months from the date of the last incident.
- b) The Internal Committee also has the power to extend the time limit for reporting by not more than three months, if it is satisfied that the circumstances were such that prevented the employee from filing a complaint within the three months. If an Aggrieved Woman is unable to make a written complaint on account of her physical or mental incapacity or her death or otherwise, her legal heir or such other person as may prescribe may make a complaint



VII. PROCESS TO BE FOLLOWED BY INTERNAL COMPLAINT COMMITTEE

- a) On receipt of the complaint, the Internal Complaint Committee would initiate a preliminary inquiry to evaluate if there is a prima facie case or not.
- b) Post establishment of a prima facie case, the Internal Complaint Committee will seek an explanation in writing from the Respondent after providing him with a copy of the complaint. Mere filing a complaint does not mean either Respondent is guilty, or the complaint is false, and it is subjected to impartial inquiry and the evidence that is made available to the Internal Complaint Committee both by the production of documents & witnesses during the inquiry.
- c) Post receipt of a reply from the Respondent, Internal Complaint Committee may before initiating an inquiry and at the request of the Aggrieved Woman, take steps to settle the matter between the Aggrieved Woman and the Respondent, through conciliation, provided that no monetary settlement shall be made as a basis of conciliation. Where a conciliation settlement arrives, no further inquiry shall be conducted by Internal Complaint Committee.
- d) If conciliation fails, or if Aggrieved Woman insists on an inquiry, the Internal Complaint Committee will initiate a detailed inquiry and submit the report with recommendations or punishments to the Respondent or close the case with reasoned findings or action against the complainant for false complainant. The Inter Complainant Committee will maintain utmost secrecy as regards the identity of the Complainant, Respondent, and Witnesses, content of the complaint, entire proceedings of probe, conciliation or inquiry, etc.
- e) The inquiry shall be completed within ninety days.

VIII. FALSE/MALICIOUS COMPLAINT AND FALSE EVIDENCE

An allegation of sexual harassment is a serious charge and hence employees should refrain from making false claims or allegations of such harassment. If the allegation against the respondent is malicious and/or any false/ misleading documents/ statements are produced during the inquiry, appropriate disciplinary action would be taken against the complainant.

IX. DETERMINATION OF COMPENSATIONS:

- a) To determine the sums to be paid to the aggrieved woman, the Internal Committee shall have regard to
 - The mental trauma, pain, suffering, and emotional distress caused to the aggrieved woman;
 - The loss of career opportunity due to the incident of sexual harassment;

POLICY ON PREVENTION OF SEXUAL HARASSMENT AT WORK PLACE (POSH)



- Medical expenses incurred by the victim for physical or psychiatric treatment;
- The income and financial status of the respondent;
- Feasibility of such payment in a lump sum or instalments.

DETAILS OF INTERNAL COMPLAINT COMMITTEE MEMBERS:

Member Name	Department	Designation
Mrs.Anitha M Eraiah (Administration)	Administrator	Presiding Officer
Mr. Vijay Mohan Reddy (Compliance)	Compliance	Member
Mrs. Durga Bhavani (Back Office Operation)	Backend Operations	Member
Mr. Gokula Nanda Mohanty (Branch Operations)	Branch Operations	Member
Ms. Neha Reddy (Human Resource)	Human Resources	Member
One External Professional (Woman) as may be Appointed by the Members of POSH Committee		External Member

AMENDMENTS & DISCLAIMER:

The Senior Management Committee (Comprising Head-HR, Chief Financial Officer, Chief Risk Officer, Chief Compliance Officer, Chief Business Officer and Chief Technology Officer) with approval from the CEO & MD can amend this Policy, as and when deemed fit. In case of any amendment(s), clarification(s), circular(s) etc. issued by the relevant authorities, not being consistent with the provisions laid down under this Policy, then such amendment(s), clarification(s), circular(s) etc. shall prevail upon the provisions hereunder and this Policy shall stand amended accordingly from the effective date as laid down under such amendment(s), clarification(s), circular(s) etc.

The provisions of the policy are subjected to change as per guidelines or amendments to POSH Act 2013 to be issued by the Union Government of India.



ANNEXURE 1: APPOINTMENT OF INTERNAL COMPLAINTS COMMITTEE FORM

<<On the letterhead>>

To

Date

Subject: the constitution of the Internal Complaints Committee in compliance with the Sexual Harassment of Women at Workplace (Prevention, Prohibition, and Redressal) Act, 2013

Madam/Sir,

As per the board resolution dated _____, the company constituted the Internal Complaints Committee to protect against sexual harassment in the workplace, prevent and redressal complaints of sexual harassment in the workplace and attend to all the matters incidental to the same.

We are pleased to inform you that your appointment as _____ of the committee has been approved by vide the board resolution dated _____.

The presiding officer and every member of the committee shall hold office for such period, not exceeding three years, from the date of their appointment.

Because of the above, you are requested to kindly convey your acceptance at the earliest, to enable this office to proceed with the procedure.

The Internal Complaints Committee, shall each year, meet at the designated interval, and prepare an annual report under section 21 of the Act read with Rule 14 which shall have the details of the cases filed if any.

(Signature)

Copy to: CEO&MD, Head - HR

Acceptance

I hereby accept my nomination as _____ of the Internal Complaints Committee and assure you that fulfill the responsibilities as per the guidelines of the Sexual Harassment of Women at Workplace (Prevention, Prohibition, and Redressal) Act, 2013

Signature