



Prohibition, Prevention & Redressal of Sexual Harassment Policy

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| Version | Board Approval date | Change/Remarks | Custodian | Approving authority |
|----------------|----------------------------|--|---------------------------------------|----------------------------|
| 1 | 05.04.2019 | Adoption | Compliance and Secretarial Department | Board |
| 2 | 30.03.2024 | Reconstitution of Internal complaints committee & policy amended in line with POSH Act, 2013 | Human Resources | Board |

I. COMMITMENT:

Our Organization is committed to providing a work environment that ensures every employee is treated with dignity and respect and afforded equitable treatment.

The Organization is also committed to promoting a work environment that is conducive to the professional growth of its employees and encourages equality of opportunity.

The Organization will not tolerate any form of sexual harassment and is committed to take all necessary steps to ensure that its employees are not subjected to any form of harassment.

II. SCOPE:

This policy applies to all Employees* (full-time, part-time, trainees, apprentice and those on contractual assignments) of the Organization and is gender neutral. It has been drafted in compliance with The Sexual Harassment of Women in Workplace (Prevention, Prohibition and Redressal) Act, 2013. The Organization will not tolerate sexual harassment, if engaged in by or against clients or suppliers or any other business associates.

The workplace includes:

1. All offices or other premises where the Organization's business is conducted.
2. All Organization-related activities performed at any other site away from the Organization's premises.
3. Any social, business or other functions where the conduct or comments may have an adverse impact on the workplace or workplace relations.
4. It also refers to any place visited by an employee as part of his or her employment, including any transportation provided by the employer for traveling to and from work.

*Employee here means Employees as defined in the scope of The Sexual Harassment of Women in Workplace (Prevention, Prohibition and Redressal) Act, 2013

III. DEFINITION OF SEXUAL HARASSMENT:

Sexual harassment may be one or a series of incidents involving unsolicited and unwelcome sexual advances, requests for sexual favors, or any other verbal, non-verbal or physical conduct of sexual nature.

Sexual Harassment at the workplace includes:

1. unwelcome sexual advances (verbal, non- verbal or physical),
2. demand or request for sexual favors,
3. any other type of sexually-oriented conduct,

4. verbal abuse or 'joking' that is sex-oriented,
5. sexually colored remarks
6. showing pornography, (*refer sec 2(n) of the act*)
7. any conduct that has the purpose or the effect of interfering with an individual's work performance or creating an intimidating, hostile or offensive work environment and/or submission to such conduct is either an explicit or implicit term or condition of employment and /or submission or rejection of the conduct is used as a basis for making employment decisions.

Inappropriate conduct could also be a joke, a prank or even a compliment, or any form of verbal, non-verbal or physical behavior that is disrespectful, with a sexual connotation. The impact defines sexual harassment, not the intent, since these gestures can also lead to harassment.

8. In addition, the following acts or 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 the employment;
 - ii. Implied or explicit threat of detrimental treatment in the behavior;
 - iii. Implied or explicit threat about their present or future employment status;
 - iv. Interfering with their work or intimidating or offensive or hostile work environment; humiliation treatment likely to affect their health or safety.
 - v. humiliating treatment likely to affect the health and safety of the aggrieved person.
 - vi. any other acts or behavior, any reasonable person views as such

IV. EXCLUSION

The following actions are examples of what does not constitute sexual harassment (the list of examples are not exhaustive and are for illustrative purposes only):

A. Consented Behaviour:

Conduct that was once allowed or tolerated and considered as friendly or consensual cannot be condemned as sexual harassment at a later stage. Sexual harassment does not refer to a normal conversation that all parties affected find acceptable. It does not refer to personal relationships that are freely entered into without intimidation or coercion.

B. Performance Management:

Workplace harassment policies stipulate that the reasonable exercise of management functions, such as providing constructive feedback or enforcing performance standards, is not considered harassment.

V. RESPONSIBILITIES REGARDING SEXUAL HARASSMENT:

All Employees of the Organization have a personal responsibility to ensure that their behavior is not contrary to this policy.

All Employees are advised to contribute to the maintenance of a work environment free from sexual harassment.

VI. COMPLAINT MECHANISM:

An appropriate complaint mechanism in the form of “**Internal Committee**” (for POSH) has been created in the Organization for time-bound redressal of the complaint made by a Complainant, which is also in compliance with The Sexual Harassment of Women in Workplace (Prevention, Prohibition and Redressal) Act, 2013.

VII. COMPLAINTS COMMITTEE:

The Organization has instituted an Internal Committee (IC) for redressal of sexual harassment complaints and for ensuring time bound treatment of such complaints.

Initially, and till further notice, the Internal Committee will comprise of the following Structure for each location;

- i) Presiding officer- shall be women employee at senior level at workplace*
- ii) Two internal members – Atleast 2 members amongst employees preferably committed to cause of women or who have experience in social work or have legal knowledge.
- iii) 1 Member amongst non-governmental organizations or associations committed to the cause of women or familiar with the issues of sexual harassment

At least one-half of the total members so nominated shall be women.

The presiding officer and every member of the Internal Committee shall hold office for such period not exceeding 3 years.

If complaint is made by anyone other than Female Employees, IC committee can allow the complaint to be chaired by Chairman, else it will be chaired by Chairwoman only, in compliance with POSH Act.*

If the complaint is against IC Employee himself/herself, then the Employee will not be allowed to represent IC, till such time the case is closed.

An Employee of the POSH Committee may resign as IC employee at any time by tendering his/her resignation in writing to the HR.

The Internal Committee (IC) is vested with the powers of a civil court under the Code of Civil Procedure, 1908 through the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013.

These powers include:

- a. summoning and enforcing the attendance of any person and examining him on oath;
- b. requiring the discovery and production of documents; and
- c. any other matter which may be prescribed

Since, the Act covers only an 'aggrieved woman' under Section 2(a), the IC cannot exercise its powers of a civil court in the cases where the victim is not a female. However, the rights of other gender will be protected under Service rules of the company.

The Internal Committee is responsible for:

- Investigating every written complaint of sexual harassment received, to assess whether sexual harassment is substantiated or not
- Recommending appropriate actions for substantiated allegations of sexual harassment
- Discouraging and preventing employment-related sexual harassment
- Conducting Gender Sensitization and Awareness Sessions.
- Providing details for annual POSH report (Only where aggrieved party is Woman)

VIII. Conciliation Proceeding

- (a) Conciliation – In the event the ICC finds a prima facie case of harassment allegedly committed by one or more employees, before conducting an enquiry, the Committee may take steps to settle the matter between the complainant and the alleged harasser through conciliation if the employee desires to do so.
- (b) In case the issue gets resolved at this stage, the ICC shall record the issue resolution and forward the same to the Company /Management. In such a situation, the ICC will not conduct any further enquiry in this matter. Monetary settlement shall not be made as a basis of conciliation.

- (c) If in case the issue does not get resolved, the ICC, after recording its reasons in writing, shall set up an Enquiry Committee.

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

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

1. Any employee facing sexual harassment, can complain directly to the Employees of the Complaints Committee, but such complaint has to be made in writing;
2. The complaint has to be made within three months from the date of the incident of sexual harassment or, in a case of a series of incidents, within a period of three months from the date of the last incident; extendable to another three months, if the committee is convinced that there is a valid reason for the delay
3. Where the Complainant is unable to file a complaint on account of his/her physical or mental incapacity or death, his/her legal heir or any other person as may be prescribed under law, may make a complaint.
4. The complaint shall contain all material and relevant details concerning the alleged Sexual Harassment including the name of the Respondent, the nature of the harassment, the dates and details of the incidents etc. Strict confidentiality of the complaint, Complainant and the Respondent shall be maintained by the Committee;
5. On receipt of a complaint, the Complaints Committee may, before initiating an inquiry and at the request of the Complainant, take steps to settle the matter between him/her and the Respondent through conciliation. Provided that no monetary settlement will be made through such conciliation.
6. Where such settlement is reached between the Complainant and the Respondent, the Complaints Committee shall record such settlement and forward the same to the Management.
7. On receipt of any complaint, the Complaints Committee shall, as soon as possible, convene a meeting of the Committee. The Committee shall also recommend to the Company if any interim remedial measures are to be taken to distance the Complainant from the Respondent to prevent further harassment at the Workplace;
8. Where the act of Sexual Harassment amounts to an offence under the Indian Penal Code or any other legislation in force, then, on receiving the complaint, the Complainant will be informed by the Complaints Committee of his/her right to initiate action under the said legislation, if the Complainant so desires;
9. On receiving a complaint of Sexual Harassment, the Complaints Committee shall, as soon as possible, proceed to conduct a full inquiry into the complaint by interviewing the Complainant and Respondent and any witnesses, determining if there are individuals with direct or indirect information regarding the complaint, and, if so, by interviewing them or by obtaining information from such other persons and making such inquiries as it thinks fit;

10. The Committee shall serve the notice of the inquiry to the Respondent, along with a copy of the complaint and the charges upon the Respondent. The Respondent shall also be provided with copies of all documents and materials provided by the Complainant in his/her statement of charges. Thereafter, the Committee shall record the testimony of the Complainant in the first instance. The Complainant may also produce other witnesses, including outsiders with the permission of the Committee;
11. Both the Respondent and the Complainant shall be afforded full opportunity to rebut and cross-examine each other and/or other witnesses. However, the right to directly cross examine shall be at the sole discretion of the Committee and shall depend on the facts and circumstances of each case
12. After the conclusion of the Complainant's evidence, the Respondent shall be given opportunity to lead his/her evidence in defense;
13. During the cross examination the Committee shall have the right to disallow any question if, after recording such question along with the reason for disallowing the same, it has reason to believe that such question is irrelevant, mischievous, slanderous and derogatory to the Respondent and or other witnesses;
14. The entire record of the inquiry proceedings including statements of the witnesses, cross-examination, averments and arguments made during the inquiry shall be reduced in writing and all parties present at the inquiry shall sign the same and be given a copy thereof for their records;
15. During the pendency of an inquiry, and on the written request of the Complainant, the Complaints Committee may recommend to the Employer to-
 1. Transfer the Aggrieved party or the Respondent to any other Workplace;
 2. Or Grant leave to the Aggrieved party up to a period of three months which shall be in addition to the leaves he/she is otherwise entitled to; or
 3. Grant such other relief to the Aggrieved party as it may consider appropriate
16. After the conclusion of the inquiry the Committee shall prepare a written report giving detailed reasons for its findings and conclusions, within 10 days of closure of the inquiries. A copy of the said report shall be shared with the Complainant and Respondent; it shall also be submitted to the Management which will implement the recommendations within 60 days of the final report.

Recommended actions, if allegations are substantiated, may include any of the following:

1. Written apology
2. Counselling
3. Written warning to the perpetrator and a copy of it maintained in the Employee's file.
4. Change of work assignment / transfer for either the perpetrator or the victim.
5. withholding increments
6. Promotion black-list for a defined period.
7. Suspension or termination of services of the Employee found guilty of the offence

17. The Committee shall complete the inquiry within a period of 90 days from the date on which the inquiry had commenced;
18. If on the completion of an inquiry by the Complaints Committee, the Committee arrives at a conclusion that the allegation against the Respondent has not been proved, it shall recommend to the Management that no action is required to be taken.
19. In case the committee arrives at a conclusion that the complaint is malicious, or that the complainant has made the complaint knowing it to be false, the Complainant shall, if deemed fit, be liable for appropriate disciplinary action by the Management as per service rules and the Act & Rule.

The malicious intent on part of the complainant shall be established after an inquiry in accordance with the procedure prescribed, before any action is recommended.

However, a mere inability to substantiate a complaint or provide adequate proof will not attract action against the complainant.

Other Important Rules applicable to the REDRESSAL OF COMPLAINTS PROCESS:

- (1) The Accused should refrain from interacting with the Complainant and any of the Complainant's witnesses or retaliating against them in any manner.
- (2) During the pendency of the Inquiry, the Complainant may request the ICC to :
 - (a) Transfer the Complainant or the Accused to another office of the Company;
 - (b) Grant complainant leave from work;
 - (c) Prohibit the accused from appraising the work performance of the Complainant and the complainant's witnesses.

The ICC will consider such requests but is not bound to accept the same if it believes the situation does not warrant it. If the ICC accepts the request, it will recommend the implementation of the same to the Company. However, it cannot recommend granting leave exceeding 3 months. The Company will report back to the ICC on the implementation of the recommendations.

Information regarding the Complaint or the inquiry or the name or addresses of the parties involved or action taken shall not be disclosed to anyone except those involved in the inquiry and implementation of the ICC's recommendations.

X. PUNISHMENT FOR FALSE OR MALICIOUS COMPLAINTS AND FALSE EVIDENCE

If the ICC concludes that a complaint is intentionally false or malicious or that any person has intentionally provided false or misleading evidence of any kind, the person who knowingly made such a false or malicious complaint or knowingly provided such false or misleading evidence may be

punished in the same manner as described in Clause IX (16). A complaint will not automatically be treated as false or malicious just because of failure to prove that Sexual Harassment occurred.

XI. MEETING OF THE COMMITTEE:

- (a) The members of the ICC shall meet at least once every three calendar months within the Company's premises as notified by the Presiding Officer.
- (b) The quorum for any valid meeting of the ICC shall be at least three members including the independent member and with not less than half the members present at such meeting being women. In the event of the number of members present and/or women members present at any meeting is less than aforesaid, the ICC shall not discuss any matters or take any actions/decisions.
- (c) In the event that the aforesaid number of members present is still less than as stated above at any meeting, adjourned from a previous day, the Presiding Officer shall notify the Company (HR Department) of the absence of such members and the Company shall take steps to forthwith appoint a substitute member in place of the absentee members and the meeting of the ICC shall be held on the next day.
- (d) The decisions taken by the ICC shall be based on majority vote and in case of equal division of votes, the Presiding officer shall have a casting vote.
- (e) The decision of the ICC will be final and binding upon all.

XII. APPEAL

In the event that any person is aggrieved from the recommendations made by the POSH Committee or non-implementation of such recommendations, he/she may appeal to the appropriate authority, as specified by law, within a period of ninety days of the recommendations.

XIII. FALSE ALLEGATIONS:

- 1. 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.
- 2. On inquiry, if the IC 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 IC may recommend to take action against the person who made the complaint as per Service Rules. In such a case, malicious intent has to be established after an enquiry in accordance with the procedure prescribed, 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 ICC concludes, that he/she has given false evidence or produced forged or misleading documents.

3. The above provision is not to discourage employees from coming forward with complaints. The organization recognizes and expects certain 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 conclude as Sexual Harassment. Complaints falls under the above, shall not be considered to be false accusations.

XIV. CONFIDENTIALITY:

(a) The Organization 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. Hence, every person who has knowledge regarding the incident shall maintain complete confidentiality under all circumstances.

(b) The privacy and dignity of individuals must be respected and matters of Sexual Harassment must be treated with great sensitivity. Therefore, all information pertaining to any complaints of Sexual Harassment should be treated as private and confidential and should not be disclosed to anyone other than the ICC or the parties involved in the complaint and, to a limited extent, only to those persons strictly on a "need to know" basis and who are expected to implement the decisions of the ICC. Anyone breaching this obligation of confidentiality shall be liable for punishment as per recommendations of the ICC.

XV. 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 Organization except where disclosure is required under disciplinary or other remedial processes.

XVI. PROTECTION TO CONCERNED PARTIES

- (a) The Company shall ensure that an employee who complains to the ICC or participates in the investigation of the Enquiry Committee as a witness or otherwise shall not be subject to any unfavourable treatment whatsoever during the course of his/her employment.
- (b) The Company is committed to ensuring that an employee who brings forward a harassment concern is not subject to any form of retaliation. Any retaliation will be subject to disciplinary action.
- (c) The ICC shall be entitled to recommend to the management of the Company, interim relief(s) for the Complainant (limited to temporary transfers or reallocation of functions of the Complainant and/or the Accused) during the course of the investigation to prevent any continuing / further gender harassment to protect the Complainant from any retaliations.

- (d) The Company will ensure that the complainant or witnesses are not victimized while dealing with complaints of sexual harassment.

XVII. PROCEDURES FOR DEALING WITH CRIMINAL CONDUCT

- (a) Some forms of severe sexual harassment (eg. sexual assault, stalking, incident exposure, physical molestation, obscene phone calls) may constitute criminal conduct.
- (b) While the Company is committed to treating most sexual harassment complaints at a Company level as far as possible, this type of conduct is not suited to internal resolution. Such complaints will be prosecuted by the Indian Judiciary System.

XVIII. SENSITIZATION TRAINING

All Employees & ICC team must go through a training every year or sooner if need be.

XIX. AWARENESS:

1. All the women Employees, Agents, Customers, Vendors, Partners and Visitors shall have access to this Policy.
2. The Company shall comply with all other details as set out under Section 19 of the Act to ensure that all employees are provided with the safe working environment at work place.
3. Company shall display the notice showing the name of the IC members suitably.
4. Company shall make a declaration regarding the Policy on sexual harassment every year in the annual report.

XX. MISCELLANEOUS

1. Company with the approval of Competent Authority 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 the Act.
2. Any such alterations or amendment or rescinding will be intimated to the employees.
3. Nothing contained in these Policy 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.
4. The IC shall prepare an Annual Report with the following details for every calendar year.
(Refer **Annexure-III**)

- a. Number of Complaints of sexual harassment received during the year;
 - b. Number of complaints disposed of during the year;
 - c. Number of cases pending for more than 90 days;
 - d. Number of workshops or awareness program against sexual harassment carried out;
 - e. Nature of action taken by the employer.
5. The above Annual Report and the MIS should be prepared by the IC and shall be submitted before the end of each calendar year to the Senior Management of the Company and District officer.

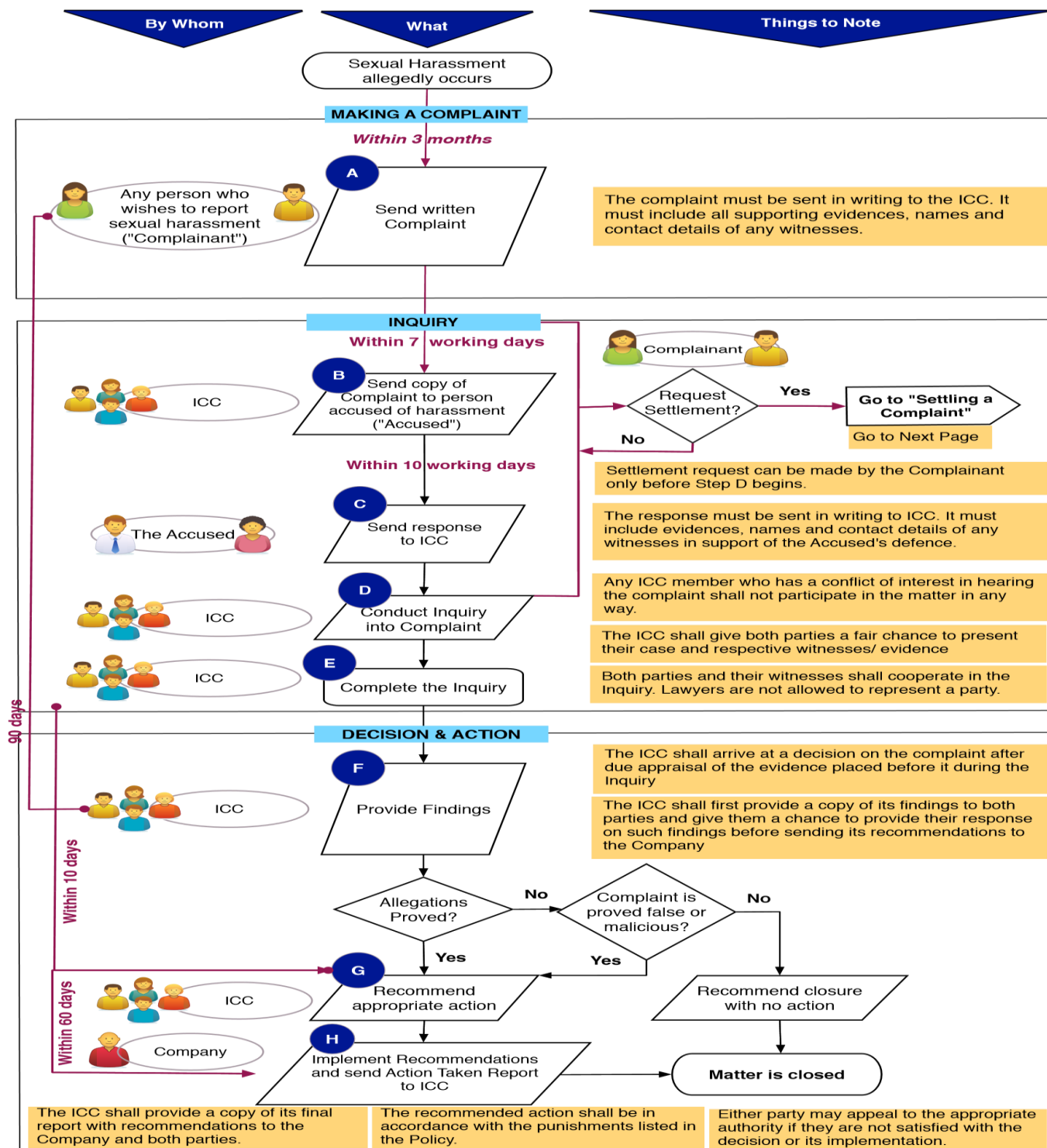
XXI. CONCLUSION:

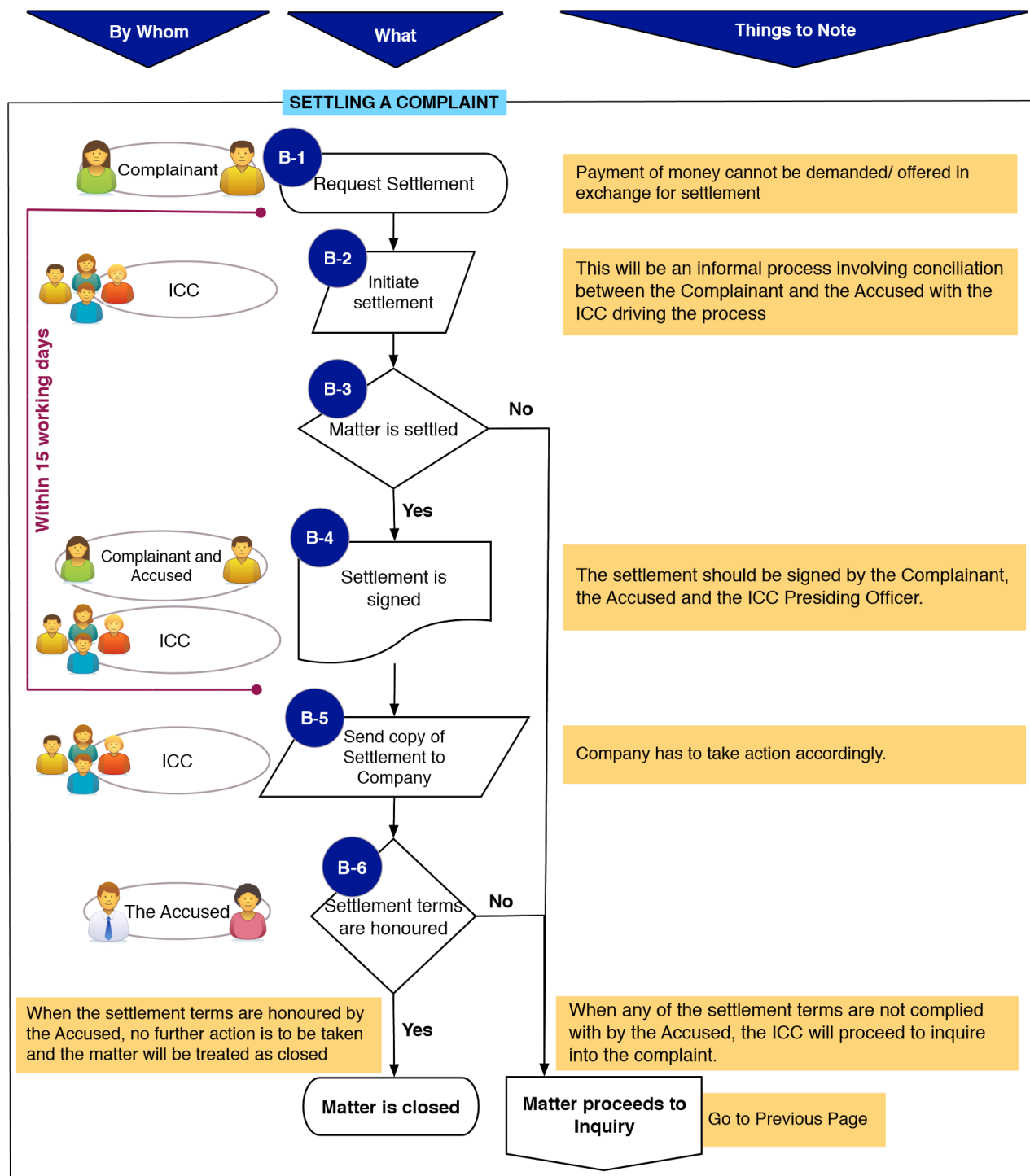
In conclusion, the Organization reiterates its commitment to providing its Employees, a workplace free from sexual harassment/ discrimination and where every Employee is treated with dignity and respect.

Encl:

- i) Redressal of complaints process- Annex-I***
- ii) ICC Composition - Annex-II***
- iii) Annual Report Disclosure Template-Annex-III***

REDRESSAL OF COMPLAINTS PROCESS





For M/s Gove Finance Limited

SD/-
Arun Vellore Surendra
Managing Director
DIN: 01617103

ICC COMMITTEE COMPOSITION

The names and contact details of the ICC members are provided below:

| S.N | Name | Role | Mobile nos. | Email | Location |
|-----|-------------------|-------------------|-------------|-----------------------------|----------|
| 1 | Ms Suguna Priya A | Presiding Officer | 9962799881 | a.sugunapriya@vstmotors.com | Chennai |
| 2 | Ms Jayaselvi R L | Internal Members | 9710404622 | jayaselvi@govefinance.in | Chennai |
| 3 | Ms Saiaswini J | | 7358160703 | j.saiaswini@govefinance.in | Chennai |
| 4 | Mr Venkatesh N | | 9445283711 | bm.chn2@govefinance.in | Chennai |
| 5 | Ms Adhilakshmi L | External Member | 9841014926 | advocateadhilogu@gmail.com | - |

Annual Report Disclosure-Template

The Internal Committee shall in each calendar year prepare, in such form and at such time as may be prescribed, below an Annual report and submit the same to the employer and the District Officer.

Format of Disclosure in the Annual Report:

Annual Reports regarding Sexual Harassment at the workplace in respect of Gove Finance Limited for the calendar year 20YY is appended below for information and taking necessary action.

| | |
|---|--|
| Number of complaints received in a year | |
| Number of complaints disposed of in a year | |
| Number of cases pending for more than 90 days | |
| Number of awareness programmes or workshops against sexual harassment conducted in a year | |
| Nature of action taken by the employee | |

The report has been prepared in compliance of Section 21 (1) of the Sexual Harassment at Workplace (Prevention, Prohibition, and Redressal) Act, 2013.

We also hereby confirm that the Company ensures that complainants or witnesses are not victimized or discriminated against while dealing with complaints of sexual harassment.

This is issued with the approval of the chairperson or Presiding officer of internal complaint Committee