

Avanti Microfinance Private Limited

## Prevention of Sexual Harassment Policy

This document was:

<b>Version</b>	<b>Drafted by</b>	<b>Reviewed by</b>	<b>Board approval and adoption date</b>
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Version 2	Mr. Sunil Kumar Tadepalli, Chief of Partnerships and HR of the Holding Company	Mr. Rahul Gupta, Director	December 16, 2024

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## **1. Introduction**

Avanti Microfinance Private Limited (hereinafter referred to as “the Company”), is committed to providing work environment that ensures every employee is treated with dignity and respect and afforded equitable treatment. The Company is also committed to promoting a work environment that is conducive to the professional growth of its employees and encourages equality of opportunity. The Company 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.

This Prevention of Sexual Harassment Policy framed by Company is in accordance with The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (“**Act**”) and the rules framed thereunder. Even though the Act is specifically aimed at providing protection for women, the Company is committed to extend the provisions of the policy for all its employees, irrespective of their gender identity.

## **2. Objective**

The objective of this policy is:

- (a) To provide protection against sexual harassment of any employee at their workplace (including during remote working conditions) and for the prevention and redressal of complaints of sexual harassment and for matters connected therewith.
- (b) To provide direction and rules for governing the conduct of employees to ensure a work place free from sexual harassment.

## **3. Scope**

This policy applies to all categories of employees of the Company, including permanent management and workmen, temporaries, trainees, and employees on contract at their workplace or at client sites. The Company will not tolerate sexual harassment, if engaged in by clients or by suppliers or any other business associates.

The workplace includes:

- (a) All offices or other premises where the Company’s business is conducted.
- (b) Any other site which is away from the Company’s premises where all company-related activities are performed.
- (c) Any social, business, or other functions where the conduct or comments may have an adverse impact on the workplace or workplace relations.

Sexual harassment is judged by the impact on the complainant and not the intent of the respondent. Sexual harassment is neither unidirectional nor gender dependent – the policy protects employees in any event related to sexual harassment, irrespective of male, female or other gender, independent of the gender of the person perpetrating the act or suffering from it.

## **4. Definition of Sexual Harassment**

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

Sexual Harassment at the workplace includes:

- (a) Unwelcome sexual advances (verbal, written or physical),
- (b) Demand or request for sexual favours,
- (c) Any other type of sexually oriented conduct,
- (d) Verbal abuse or 'joking' that is sex-oriented,
- (e) 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.

## **5. Responsibilities Regarding Sexual Harassment**

All employees of the Company have a personal responsibility to ensure that their behaviour is not contrary to this policy. All employees are encouraged to reinforce the maintenance of a work environment free from sexual harassment.

## **6. Complaint Mechanism**

Whether or not such conduct constitutes an offence under law or a breach of the service rules, an appropriate complaint mechanism in the form of "Internal Complaints Committee" has been created in the Company for time-bound redressal of the complaint made by the victim.

## **7. Internal Complaints Committee of the Holding Company**

The Company has instituted an Internal Complaints Committee for redressal of sexual harassment complaint (made by the victim) and for ensuring time bound treatment of such complaints.

Initially, and till further notice, the Internal Complaints Committee will comprise of the following members of the holding company:

- 1. Ms. Urvashi P. Bahirsheth - Presiding Officer
- 2. Mr. Rahul Gupta - Member
- 3. Mr. Sunil Kumar Tadepalli - Member
- 4. Ms. Anuja Singh – External Member

The Internal Complaints Committee is responsible for:

- (a) Investigating every formal written complaint of sexual harassment;
- (b) Taking appropriate remedial measures to respond to any substantiated allegations of sexual harassment;
- (c) Discouraging and preventing employment-related sexual harassment.

## **8. Procedures for Resolution, Settlement or Prosecution of Acts of Sexual**

## **Harassments**

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

### **8.1. Informal Resolution Options**

- (a) 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.
- (b) If the harassment does not stop or if victim is not comfortable with addressing the harasser directly, she can bring her concern to the attention of the Internal Complaints Committee for redressal of her grievances. The Internal Complaints Committee will thereafter provide advice or extend support as requested and will undertake prompt investigation to resolve the matter.

### **8.2. Complaints**

- (a) Any employee with a harassment concern, who is not comfortable with the informal resolution options or has exhausted such options, may make a formal complaint to the Chairperson of the Internal Complaints Committee constituted by the Company. The complaint will have to be in writing and can be in form of a letter, preferably within 3 months from the date of occurrence of the alleged incident and in case of series of incidents, within a period of 3 months from the date of last alleged incident, sent in a sealed envelope. Alternately, the employee can send complaint through an email. The employee is required to disclose his / her name, department, division, and location he / she is working in, to enable the Chairperson to contact him / her and take the matter forward.
- (b) The Chairperson of the Internal Complaints Committee 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 mean an offence of Sexual Harassment, she will record this finding with reasons and communicate the same to the complainant. ]
- (c) If the Chairperson of the Internal Complaints Committee determines that the allegations constitute an act of sexual harassment, she will proceed to investigate the allegation with the assistance of the Internal Complaints Committee.
- (d) Where such conduct on the part of the accused amounts to a specific offence under the law, the Company will initiate appropriate action in accordance with law by making a complaint with the appropriate authority.
- (e) The Internal Complaints Committee will conduct such investigations in a timely manner and will submit a written report containing the findings and recommendations to the whole time director as soon as practically possible and in any case, not later than 90 days from the date of receipt of the

complaint. The whole time director will ensure corrective action on the recommendations of the Internal Complaints Committee and keep the complainant informed of the same.

- (f) Corrective action may include any of the following:
  - i) Formal apology.
  - ii) Counselling.
  - iii) Written warning to the perpetrator and a copy of it maintained in the employee's file.
  - iv) Change of work assignment / transfer for either the perpetrator or the victim.
  - v) Suspension or termination of services of the employee found guilty of the offence.
  
- (g) In case the complaint is found to be false, the Complainant will, if deemed fit, be liable for appropriate disciplinary action by the Management.

## **9. 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 interests of the victim, the accused person and others who may report incidents of sexual harassment, confidentiality will be maintained throughout any investigatory process to the extent practicable and appropriate under the circumstances.

## **10. 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.

## **11. 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 subject to disciplinary action. The Company will ensure that 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 subject to disciplinary action.

## **12. Regulatory References**

This policy is framed according to the following regulatory reference:

- (a) The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013.