



## POLICY AGAINST SEXUAL HARASSMENT

### 1. Objective

ORIGO Finance Private Limited (hereinafter referred to as “**We**” or “**Company**” or “**ORIGO**”) is committed to creating and maintaining a secure work environment. We respect dignity of everyone at our work place, whether they are employees, partners, sub-contract workers or customers.

ORIGO's Policy against sexual harassment (hereinafter referred to as the “**Policy**”) has been framed in accordance with the provisions of “The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013” and rules framed thereunder (hereinafter referred to as “**the Act**”). Accordingly, while the policy covers all the key aspects of the Act, for any further clarification reference shall always be made to the Act and the provisions of the Act shall prevail. The objective of this policy is to provide protection against sexual harassment of women at workplace and for the prevention and redressal of complaints of sexual harassment and matters related to it.

ORIGO employees are expected to maintain high standards of dignity, respect and positive regard for one another in all their dealings.

- a) All ORIGO employees will understand and appreciate the rights of the individual to be treated with dignity.
- b) All ORIGO employees are required to maintain a work environment which is free from any kind of harassment.
- c) All ORIGO employees will refrain from committing any acts of sexual harassment at work place.
- d) Allegations of sexual harassment will be dealt seriously, expeditiously, sensitively and with confidentiality.

ORIGO employees will be protected against victimization, retaliation for filing or reporting a complaint on sexual harassment and will also be protected from false accusations.

### 2. Scope of the Policy

We at ORIGO are committed towards giving every employee a just and fair hearing on issues encountered by them at the workplace with special attention to sexual harassment and this Policy covers every “employee” (as defined hereinunder) of the Company. ORIGO encourages every employee who believe that they have been or are being sexually harassed to use the redressal mechanism as provided in this Policy.

This Policy is with respect to prevention, prohibition & redressal of sexual harassment which may arise in places not limited to geographical location viz. Company's offices / branches but includes all such places or locations where acts are conducted in context of working relationships or whilst fulfilling professional duties or which may be visited by an employee during the course of employment.

### 3. Definitions

- a) “**sexual harassment**” sexual harassment would mean and include (whether direct or by implication) any of the following:
  - unwelcomed acts or behavior (whether directly or by implication) of a sexual nature. The unwanted nature of sexual

harassment distinguishes it from behaviour that is welcome and mutual. Physical conduct of a sexual nature includes all unwanted physical contact and advances.

- verbal forms of sexual harassment include unwelcome innuendoes, suggestions and hints, sexual advances, comments with sexual overtones, objectionable sex-related jokes or insults or unwelcome graphic comments about a person's body made in their presence or directed toward them.
- non-verbal forms of sexual harassment include unwelcome gestures, indecent exposure, and the unwelcome display of sexually explicit pictures and objects in any media.
- any other unwelcome physical, verbal or non-verbal conduct of sexual nature or inappropriate inquiries, and unwelcome whistling directed towards an aggrieved woman.
- the following circumstances, among other(s), if it occurs or is present in relation to or connected with any act or behaviour of sexual harassment, as defined above, may also amount to sexual harassment:
  - implied or explicit promise of preferential treatment at work; or
  - implied or explicit threat of detrimental treatment at work; or
  - implied or explicit threat about present or future employment status; or
  - interference with work or creation of an intimidating or offensive work environment; or
  - Humiliating treatment likely to affect health, safety or self-esteem.

In addition to the instances mentioned hereinabove, any other acts or behaviour, which outrages the modesty of a woman, will be considered as sexual harassment. However, sexual harassment does not refer to occasional compliments of a socially acceptable nature.

- b) “**aggrieved woman**” means in relation to a workplace, a woman, of any age, whether employed or not, who alleges to have been subjected to any act of sexual harassment by the respondent and includes contractual, temporary, visitors.
- c) “**respondent**” means a person against whom a complaint of sexual harassment has been made by the aggrieved woman.
- d) “**employee**” means a person employed at the workplace, for any work on regular, temporary, ad-hoc or daily wage basis, either directly or through an agent, including a contractor, with or without the knowledge of ORIGO, whether for remuneration or not, or working on a voluntary basis or otherwise, whether the terms of employment are express or implied and includes a coworker, a contract worker, probationer, trainee, apprentice or by any other such name.
- e) “**Internal Complaints Committee (ICC)**” means a committee constituted by ORIGO as per this Policy.

#### 4. **Internal Complaints Committee (ICC)**

ORIGO has instituted an Internal Complaint Committee for redressal of sexual harassment complaint that may be received from an aggrieved woman and for ensuring time bound treatment of such complaints. The investigation shall be carried out by ICC constituted for this purpose.

The ICC shall be constituted in the following manner in terms of the Act:

- A woman employee employed at a senior level amongst the employees who shall act as the Presiding Officer;
- Not less than 2 members from amongst employees preferably committed to the cause of women **OR** who have had experience in social work **OR** have legal knowledge; and
- One member shall be from amongst non-governmental organizations (NGOs) **OR** associations committed to the cause of women **OR** a person familiar with the issues relating to sexual harassment.

The Presiding Officer and every member of the ICC shall hold office for such period, not exceeding 3 (three) years, from the date of their nomination by ORIGO.

The names and details of the members of the ICC appointed by ORIGO in line with the requirements specified in Clause 4 above are listed as follows:

S.No.	Name	Designation	Contact Details
1.	Nalini Naidu	Presiding officer	nalini.naidu@origofin.com
2.	Suneetha Prem	Member	suneetha@origoindia.com
3.	Ravi Varma P	Member	ravi.varma@origofin.com
4.	Nilika Dutta	Member from NGO	nilikadutta@gmail.com

**Duties and Responsibilities of ICC:**

The ICC constituted by ORIGO shall be responsible for the following actions:

- receiving complaints of sexual harassment at the workplace;
- initiating and conducting inquiry as per the established procedure;
- submitting findings and recommendations of inquiries;
- coordinating with the Board in implementing appropriate action;
- maintaining strict confidentiality throughout the process as per established guidelines; and
- submitting annual reports in the prescribed format.

**5. Complaint Redressal Mechanism**

➤ **Filing and manner of complaint:**

- If the aggrieved woman believes that she has been subjected to sexual harassment, then the complaint/grievance should be promptly reported to the ICC within 3 (three) months from the date of incident or last incident in case she is subject to series of incidents.
- At the time of filing the complaint, the aggrieved woman shall submit to the ICC, 6 (six) copies of the complaint along with supporting documents, names and addresses of the witnesses.
- In the event, such complaint cannot be made in writing, the Presiding Officer or any member of the ICC shall render all reasonable assistance to the aggrieved woman for making the complaint in writing.
- The complaint / grievance can also be made by the legal heir, relative, friend, co-worker, or any person having knowledge of the incident under prior written consent from the aggrieved woman, where the aggrieved woman

is unable to make a complaint on account of her physical or mental incapacity. The complaint / grievance can also be reported to any of the following:

- Reporting Supervisor
  - Human Resource (HR) Head
- e) If the complaint has been made to the reporting supervisor or HR head, they are obligated to report it to the ICC while maintaining confidentiality.
- f) ICC on receiving the complaint / grievance, if required, may ask the aggrieved woman to furnish additional information about the alleged harassment.
- g) ICC shall send one of the copies received from the aggrieved woman to the accused within a period of 7 (seven) working days.
- h) The respondent shall file a reply to the complaint along with a list of documents and the names and addresses of the witnesses within a period not exceeding 10 (ten) working days from the date of receipt of the documents.
- i) ICC will hold a meeting with the aggrieved woman within 5 (five) working days of the receipt of the response from the respondent.

Wherever applicable, ORIGO ensures that all the complaints of harassment are dealt with speedily, discreetly and as close as possible to the point of origin.

➤ **Resolution procedure through conciliation**

- a) Before initiating the inquiry for any complaint / grievance of sexual harassment, the ICC may at the request of the aggrieved woman, take steps to settle the matter between her and the respondent through conciliation, provided no monetary settlement shall be made as a basis of such conciliation.
- b) Where upon conciliation, the parties agree to settle the matter, ICC shall record the settlement so arrived and forward the same to the management of the Company for taking recommended actions. No further inquiry shall be conducted by the ICC in the event a settlement is arrived.
- c) However, in the event the aggrieved woman informs the ICC that any term or condition of the settlement arrived has not been complied with by the respondent, the ICC shall proceed to make an inquiry into the complaint.

➤ **Resolution procedure through formal inquiry**

- a) If the complaint / grievance of sexual harassment is not resorted through conciliation or no request for conciliation is made by the aggrieved woman in first place, ICC will initiate inquiry under strict confidence and in prompt and impartial manner.
- b) ICC will thoroughly inquire the complaint / grievance and will take the appropriate course of action.
- c) Any victimization of, or retaliation against, the complainant or any ORIGO employee who gives evidence regarding sexual harassment will be subject to disciplinary action up to and including termination of his/her employment.
- d) ICC shall have the right to terminate the inquiry proceedings or to give an ex-parte decision on the complaint, if the complainant or the respondent fails, without sufficient cause, to present herself or himself for 3 (three) consecutive hearings convened by the Presiding Officer. However, such termination or ex-parte order may not be passed without giving a notice in writing, 15 (fifteen) days in advance, to the party concerned.

➤ **Inquiry report**

- a) On the completion of an inquiry, ICC shall provide a report of its findings to the management of the Company within a period of 10 (ten) days from the date of completion of the inquiry and such report shall be made available to the concerned parties.
- b) Where the ICC arrives at the conclusion that the allegation against the respondent has not been proved, it shall recommend to the management of the Company that no action is required to be taken in the matter.
- c) Where the ICC arrives at the conclusion that the allegation against the respondent has been proved, it shall recommend to the management of the Company the following-
  - i. to take any action including a written apology, warning, reprimand or censure, withholding of promotion, withholding of pay rise or increments, terminating the accused from service or undergoing a counselling session or carrying out community service;
  - ii. to deduct from the salary or wages of the respondent such sum as the ICC may consider appropriate to be paid to the aggrieved woman or to her legal heirs, as it may determine.

Provided that in case the management of the Company is unable to make such deduction from the salary of the respondent due to him being absent from duty or cessation of employment, it may direct to the respondent to pay such sum to the aggrieved woman.

Provided further that in case the respondent fails to pay the aforementioned sum, ICC may forward the order for recovery of the sum as an arrear of land revenue to the concerned district officer appointed under the Act.

The management of the Company shall act upon the recommendation of ICC within a period of 60 (sixty) days of receipt.

**6. Determining the Compensation**

For the purpose of determining the sums to be paid to the aggrieved woman hereinabove, ICC shall have regard to-

- a) the mental trauma, pain, suffering and emotional distress caused to the aggrieved woman;
- b) the loss in the career opportunity due to the incident of sexual harassment;
- c) medical expenses incurred by the victim for physical or psychiatric treatment;
- d) the income and financial status of the accused;
- e) feasibility of such payment in lump sum or in instalments.

**7. Punishment for false or malicious complaint and false evidence**

Where the ICC arrives at a conclusion that the allegation against the respondent is malicious or the aggrieved woman or any other person making the complaint has made the complaint knowing it to be false or the aggrieved woman or any other person making the complaint has produced any forged or misleading document, it may recommend to the management of the Company to take any action against the woman or the person who has made the complaint including a written apology, warning, reprimand or censure, withholding of promotion, withholding of pay rise or increments, terminating the such person making the



complaint from service or undergoing a counselling session or carrying out community service.

**8. Note**

ORIGO has set stringent terms for dealing with sexual harassment cases. In case any such conduct amounts to a specific offence under the Indian Penal Code or under any other law, ORIGO shall initiate appropriate action in accordance with the Act and the applicable law by lodging a complaint with the appropriate authority.

**9. Confidentiality**

The contents of the complaint, the identity and addresses of the aggrieved staff member, respondent and witnesses, any information relating to conciliation and inquiry proceedings, recommendations of the ICC and the action taken by ORIGO shall not be published, communicated or made known to the public, press and media in any manner. All complaints / grievances of sexual harassment will be taken seriously, will be held in strict confidence and will be inquired promptly in an impartial manner. For the purpose of completing the inquiry, key witnesses or other stakeholders may be required to be taken into confidence at the strict discretion of the ICC.