



**PREVENTION OF SEXUAL
HARASSMENT AT WORKPLACE**

First Issue Date: 21.07.2016
Rev. No: 1
Rev. Issue Date: 24.01.2019
Rev. No : 2
Rev. Issue Date: 26.03.2020
Rev. No : 3
Rev. Issue Date: 15.06.2020
Rev. No : 4
Rev. Issue Date: 24.03.2022
Rev. No : 5
Rev. Issue Date: 29.10.2024

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REVISION HISTORY

S. No	Date	Revision details
1	24.01.2019	The Board approved reconstitution of the Committee, replacing one member, with the new Manager of HR.
2	26.03.2020	The Managing Director shall constitute a committee to be known as 'Internal Complaints Committee' at Head Office and at Regional Offices by an order in writing. Managing Director is authorised to (a) make changes to the constitution of the Committee as and when required and (b) take any other steps in connection with proper functioning of the Committee. Complaint Redressal Mechanism
3	15.06.2020	Formation of Internal Complaints Committee (ICC) at regional level
4	24.03.2022	Reconstitution of Internal Complaints Committee at Head Office replacing a member who has resigned.
5	29.10.2024	Rewording of Internal Complaints Committee (ICC) to Internal Committee(IC) Change in Procedural Guidelines

I. INTRODUCTION

Veritas Finance Private Limited (Company) treats every employee with dignity and respect that enables employees to work free from unwelcome, offensive and discriminatory behaviour. The Company treats sexual harassment as misconduct under the service rules and aims to initiate action for such misconduct through implementation of the said Policy.

This Policy will be posted on the Company's website at www.veritasfin.in

II. OBJECTIVE

- 1) To promote a safe and secure work environment for women including but not limited to working within the premises of the Company.
- 2) The policy aims at defining sexual harassment and providing a clearly stated codified redressal mechanism for any sexual harassment occurring at workplace. The main objective of the policy is to enable all those working with the Company to raise their concerns and make complaints without any fear and be heard in a fair and unbiased manner.

III. REGULATORY REQUIREMENT

This policy is in accordance with the provisions of "The Sexual Harassment of Women at Workplace (Prevention, Prohibition, and Redressal) Act, 2013". The purpose of this policy is to POSH policy provides for protection against sexual harassment at the workplace, for the prevention and redressal of complaints of sexual harassment and to enforce strong disciplinary action in the event of any such incident.

This policy provides guidelines for prompt redressal of complaints related to sexual harassment and in compliance with The Sexual Harassment of Women at Workplace (Prevention, Prohibition, and Redressal) Act, 2013 (the "Act").

IV. SCOPE

VERITAS's Policy with regard to Prevention, Prohibition and Redressal of Sexual Harassment covers all employees across the Company. Veritas encourages every woman employee who believes they are sexually harassed to use the redressal mechanism as provided in this policy.

The company aims to provide a safe working environment for all people.

This policy is applicable to all the members of the company including employer and those who are employed on regular, temporary, on a daily wage basis, etc.

The policy also extends to those who are not employees of the company such as customers, clients, visitors, interns, contract workers, suppliers, etc.

This policy is restricted to the business locations of the company and any external location visited by the employees during the course of employment whether inside or outside of India.

V. POLICY AND ITS EFFECT

Veritas Finance Private Limited Policy on prevention of Sexual Harassment at Workplace includes sexual harassment by fellow employees, supervisors, managers as well as agents, contractors, customers, vendors, partners and, visitors including employees of outsourced entities. Sexual harassment is judged by the impact on the complainant and not the intent of the Respondent.

This Policy comes into force with immediate effect.

VI. DEFINITIONS

- a) **“Aggrieved Person”** means a person in relation to work place whether employed or not, who alleges to have been subject to any act of sexual harassment by the Respondent.
- b) **“Company”** means Veritas Finance Private Limited.
- c) **“Employee”** means a person employed at a workplace for any work on regular, temporary, ad hoc or daily wages basis, either directly or through an agent, including a contractor, with or without the knowledge of the principal employer, 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 co-worker, a contract worker, probationer, trainee, apprentice or called by any other such name;
- d) **“Internal Committee”** means a committee constituted by Company as per this Policy.
- e) **“Respondent”** means a person against whom the aggrieved person has made a complaint.
- f) **“Sexual Harassment”** includes any one or more of the following unwelcome acts or behaviour (whether directly or by implication) such as:
 - i. Physical contact and advances; or
 - ii. A demand or request for sexual favours; or
 - iii. Making sexually coloured remarks; or
 - iv. Showing pornography or other offensive or derogatory pictures, cartoons, representations, graphics, pamphlets or sayings; or
 - v. Any other unwelcome physical, verbal or non - verbal conduct of sexual nature; or

Following circumstances amongst other circumstances mentioned above may constitute sexual harassment if it occurs or is present in relation or connected with any act or behaviour of sexual harassment which includes Implied or explicit promise of preferential treatment in their employment, implied or explicit threat of detrimental treatment in her employment, implied or explicit threat about their present or future employment status, interfering with their work or creating an intimidating or offensive or hostile work environment and humiliation treatment likely to affect their health or safety.

In addition to the instances mentioned hereinabove, any other acts or behaviour, which outrages the modesty of a female employee, will be considered as sexual harassment.

- g) **“Workplace”** includes any department, division, undertaking, establishment, office or branch unit. Any place visited by the employee arising out of or during the course of employment including transportation provided by the employer for undertaking such journey.

VII. INTERPRETATION

Terms that have not been defined in this policy shall have the same meaning assigned to them in the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act 2013 as amended from time to time.

VIII. INTERNAL COMMITTEE

The Internal Committee constituted by the Company (IC) shall consist of:

- 1) A woman employee employed at a senior level amongst the employees shall act as Presiding officer of the committee.
- 2) 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
- 3) A representative from a NGO or associations committed to the cause of women or a person familiar with issues relating to Sexual Harassment.

To ensure confidentiality, a dedicated e-mail id <poshic@veritasfin.in> has been created for employees, for sending sexual harassment related complaints. This e-mail id can be accessed only by members of the IC.

The Internal Committee is responsible for inter alia:

- Receiving complaints of sexual harassment at work place
- Initiating and conducting enquiry as per established procedure
- Submitting reports of its findings
- Taking appropriate remedial measures to respond to any substantiated allegations of Sexual Harassment.
- Maintaining strict confidentiality as per the established procedure
- Discouraging and preventing employment-related sexual harassment.
- Any complaint that comes to the IC will be dealt with appropriately, sensitively and confidentially in the most judicious and un-biased manner within certain defined time frame.

Where the Presiding Officer or any Member of the Internal Committee:

- (a) contravenes the provisions of section 16; or
- (b) has been convicted for an offence or an inquiry into an offence under any law for that time being force is pending against him/ her or

(c) has been found guilty in any disciplinary proceedings or a disciplinary proceeding is pending against him; or

(d) has so abused his position as to render his continuance in office prejudicial to the public interest, such Presiding Officer or Member, as the case may be, shall be removed from the Committee and the vacancy so created or any casual vacancy shall be filled by fresh nomination in accordance with the provisions of section 4(5) of Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act 2013.

At least half the total members of each IC shall be women. The Presiding Officer and every member of each IC shall hold office for such period, not exceeding three years, from the date of their nomination as may be specified by the Company.

● **INTERNAL COMMITTEE (IC) AT THE HEAD OFFICE** The current

Members of the IC at the head office shall consist of:

S. No	Name & Designation	Membership
1	Kanchana Srikanth D - Executive Vice President - Chief Compliance Officer	Presiding Officer
2	Prakash Rayen J - Executive Director & Chief People Officer	Member
3	Laxmi S V - Deputy Vice President	Member
4	Latha D - Advocate	External Member

● **INTERNAL COMMITTEE (IC) AT REGIONAL LEVEL**

Appointment of Regional IC members strengthen the POSH committee and bring vigilance through regional presence.

The POSH committee will work centrally from head office having regional members co-opted to work for the committee as active members in trainings, awareness sessions, meetings, inquiries and grievance redressal. They shall also be responsible as a member of POSH committee at regional level to ensure a safe environment for women.

The Regional Managers/ AVPs will be designated as regional IC members and be trained by the POSH committee on their responsibilities as an IC member in addition to the POSH trainings. Women employees at senior level in regional offices will be joint members of these committee, wherever available.

IX. PROCEDURE TO FILE COMPLAINT

Process for filing Complaint filed by the Aggrieved woman:

- An aggrieved woman may make, in writing, a complaint of sexual harassment at workplace to the Internal Committee within a period of 3 months from the date of incident/ last incident.

- The Internal Committee can extend the timeline by another 3 months for reasons recorded in writing, if satisfied that these reasons prevented the lodging of the complaint within the period.
- If a complaint cannot be made in writing, the Presiding Officer or any Member of the Internal Committee shall render all reasonable assistance to the women for making the complaint in writing.
- The complaint can also be physically submitted to any IC member.

If the Aggrieved Woman is unable to make a complaint on account of her physical incapacity, a complaint may be filed by:

- a. her relative or friend; or
- b. her co-worker; or
- c. an officer of the National Commission for Women or State Women's Commission.
- d. any person who has knowledge of the incident, with the written consent of the Aggrieved Woman

If the Aggrieved Woman is unable to make a complaint on account of her mental incapacity, a complaint may be filed by

- a. her relative or friend; or
- b. a special educator; or
- c. a qualified psychiatrist or psychologist; or
- d. the guardian or authority under whose care she is receiving treatment or care; or
- e. any person who has knowledge of the incident jointly with the Aggrieved Woman's relative or friend or a special educator or qualified psychiatrist or psychologist, or guardian or authority under whose care she is receiving treatment or care

If the Aggrieved Woman for any other reason is unable to make a complaint, a complaint may be filed by any person who has knowledge of the incident, with her written consent.

If the Aggrieved Woman is deceased, a complaint may be filed by any person who has knowledge of the incident, with the written consent of her legal heir.

The complaint shall be submitted by the complainant to the IC in writing or shall be submitted to the IC electronically at poshic@veritasfin.in

IC's guideline on receiving a complaint:

On receipt of the complaint by IC as stated above, IC should not treat the incident as any other dispute as the Complainants may be embarrassed and distressed. IC to treat the issue diligently, tactfully on receipt of the complaint.

Whoever receives the complaint should give a comfort to complainant by informing that

- 1) Complaints are listened to and the complainant to be informed that the Company takes the concerns seriously.
- 2) Complainant is informed that these concerns will be reported to the appropriate committee and follow up will be done speedily.
- 3) Situations are not pre-judged.

- 4) Written notes are to be taken while listening to the person.
- 5) When taking notes, complainant's own words, where possible, are to be used accurately.
- 6) Clear description of the incident in simple and direct terms is prepared and details are confirmed with the complainant. - All notes are kept strictly confidential.
- 7) Complainant's agreement is taken to allow proceeding with the matter, which involves a formal investigation.
- 8) The complainant is advised that although the process is confidential, the respondent needs to be informed and any witnesses and persons directly involved in the complaint process will also learn of the complainant's identity.
- 9) Care is taken to prevent any disadvantage to or victimization of either the complainant or the respondent.

Conciliation – Only on the request of Aggrieved person

On receipt of the complaint, before initiating the inquiry, IC may take steps to conciliate the complaint between the complainant and the respondent.

- No monetary settlement can be made as a basis of conciliation.
- In case a settlement is arrived at, the committee records & reports the same to the employer for taking appropriate action.
- Resolution through conciliation is to happen within 2 weeks of receipt of complaint.
- The committee shall provide copies of the settlement to complainant & respondent.
- Where a settlement is arrived at, no further inquiry is to be conducted by the committee.

Formal Inquiry:

IC can directly initiate inquiry if:

- No conciliation is requested by aggrieved woman.
- Conciliation has not resulted in any settlement.
- Complainant informs the committee that any term or condition of the settlement arrived through conciliation, has not been complied with by respondent.

Procedure of inquiry:

- Complaint along with supporting documents and the names of the witnesses, if any.
- The Committee will hold a meeting with the Complainant within seven days of receipt of the complaint, but no later than a week in any case.
- At the first meeting, the Committee members shall hear the Complainant and record her allegations. The Complainant can also submit any corroborative material with a documentary proof, oral or written material, etc., to substantiate her complaint.
- The Committee shall proceed with the enquiry and communicate the same to the Complainant and Respondent.
- Upon receipt of the complaint, the committee will send 1 copy of the complaint to Respondent within 7 working days of receiving the complaint.
- Respondent shall reply with all supporting documents within 10 working days of receiving the copy of the complaint.
- Thereafter, the Respondent may be called for a deposition before the Committee and an opportunity will be given to him to give an explanation, where after, an inquiry shall be conducted and concluded.

- The Complainant shall be provided with a copy of the written explanation submitted by the Respondent.
- If the Complainant or the respondent desires any witness/es to be called, they shall communicate in writing to the Committee the names of witness/es that they propose to call.
- The Committee shall call upon all witnesses mentioned by both the parties.
- The Committee shall provide every reasonable opportunity to the Complainant and the Respondent for putting forward and defending their respective case.
- If either party desires to tender any documents by way of evidence before the Committee, the same is to be supplied as original copies of such documents. Signatures should be affixed on the respective documents to certify these to be original copies.
- No legal practitioner can represent any party at any stage of the inquiry procedure
- IC is to make inquiry into the complaint in accordance with the principles of natural justice.
- In conducting the inquiry, a minimum of three committee members including the Presiding Officer are to be present.
- The employer shall provide all necessary assistance for the purpose of ensuring full, effective and speedy implementation of this policy
- Where sexual harassment occurs as a result of an act or omission by any third party or outsider, the company shall take all steps necessary and reasonable to assist the affected person in terms of support and preventive action.
- In the event, the complaint does not fall under the purview of Sexual Harassment or the complaint does not mean an offence of Sexual Harassment, the same would be dropped after recording the reasons thereof.
- If the complainant or respondent desires to cross examine any witnesses, the Committee facilitates the same and records the statements. In case complainant or respondent seeks to ask questions to the other party, they may give them to the Committee which asks them and records the statement of the other party.
- Any such inquiry is completed, including the submission of the Inquiry Report, within 90 days from the date on which the inquiry is commenced.
- The inquiry procedure should ensure absolute fairness to all parties.

Interim relief:

During pendency of the inquiry, on a written request made by the complainant, the committee may recommend to the employer to:

- Transfer the complainant or the respondent to any other workplace
- Grant leave to the aggrieved woman of maximum 3 months, in addition to the leave she would be otherwise entitled
- Prevent the respondent from assessing complainant's work performance
- Grant such other relief as may be appropriate

Once the recommendations of interim relief are implemented, the same is informed to the committee by HR.

Termination of Inquiry:

IC may terminate the inquiry or give ex-parte decision, if complainant or respondent respectively is

absent for 3 consecutive hearings, without sufficient reason. IC through HR to give a 15 day written notice, before termination of enquiry or ex-parte order.

Action Post Inquiry:

IC submits its report containing the findings and recommendations to the employer, within 10 days of completion of the inquiry.

If Complaint not proved:

Where IC arrives at the conclusion that the allegation against the respondent has not been proved, it recommends to the employer that no action is required to be taken in this matter. Further, the committee ensures that both parties understand that the matter has been fully investigated, that the matter is now concluded, and neither will be disadvantaged within the Company.

If Complaint proved:

Where IC arrives at the conclusion that the allegation against the respondent has been proved, it recommends to the employer to take necessary action for sexual harassment as misconduct, in accordance with the applicable service rules and policies, and this may include based on the veracity of the complaint and findings of IC

- a) Counselling
- b) Censure or reprimand
- c) Apology to be tendered by respondent
- d) Written warning
- e) Withholding promotion and/or increments
- f) Suspension
- g) Termination
- h) Or any other action that the employer may deem fit.

The Company is required to act upon the recommendations within 60 days and confirm to the committee. Post implementation of the actions, follow up with the complainant should also occur to ascertain whether the behaviour has in fact stopped, the solution is working satisfactorily and if no victimization of either party is occurring.

Penal Consequences of Sexual Harassment:

In case IC finds the degree of offence coverable under the Indian Penal Code, then this fact shall be mentioned in its report and appropriate action shall be initiated by the employer, for making a Police Complaint.

Under the Indian Penal Code, (IPC), the newly introduced Section (S. 354A) which deals with Sexual Harassment has made this a 'cognizable offense' i.e. a person charged with Sexual Harassment may be arrested without a warrant.

Malicious Allegations:

Where the committee arrives at the 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 employer to take action against the woman or the person making the complaint. While deciding malicious intent, the committee should consider that

mere inability to substantiate a complaint need not mean malicious intent. Malicious intent must be clearly established through a separate inquiry by Disciplinary Committee.

Confidentiality:

The identity of the complainant, respondent, witnesses, statements and other evidence obtained in the course of inquiry process, recommendations of the committees, action taken by the employer is considered as confidential materials, and not published or made known to public or media. Any person contravening the confidentiality clauses is subject to disciplinary action as prescribed in the act.

Appeal:

Any party not satisfied or further aggrieved by the implementation or non-implementation of recommendations made, may appeal to the appellate authority (court or Tribunal) in accordance with the Act, within 90 days of the recommendations being communicated.

Compliance:

The IC shall in each calendar year prepare, in such format as may be prescribed, an annual report and submit the same to the employer and the District Officer (as defined in the Act).

The report shall have the following details:

- number of complaints of Sexual harassment received in the year
- number of complaints disposed of during the year
- number of cases pending for more than 90 days
- number of workshops or awareness program against Sexual Harassment carried out
- nature of action taken by the employer or District Officer

X. COMPLAINT REDRESSAL MECHANISM

- 1) On receipt of complaint, the Internal Committee will decide the place and time for hearing the complaint and intimates the date, time and place of hearing to the Complainant and Respondent. The Internal Committee follows principle of Natural Justice while handling such complaints.
- 2) Respondent shall file reply within 10 working days of receipt of the complaint along with list of documents, names and addresses of witnesses.
- 3) Internal Committee shall have the right to terminate the enquiry or give ex-parte decision on the complaint, if the Respondent or complainant remains absent for 3 consecutive hearings, without sufficient cause.
- 4) The Internal Committee may before initiating an inquiry, and at the aggrieved person's request, attempt to settle the matter through conciliation.
- 5) The Internal Committee may during such investigation may exercise the power of a civil court.

XI. ACTION

- 1) The Internal Committee shall on completion of the enquiry provide a report of its findings within 10 days from the date of completion of the enquiry and such report shall be made

available to the concerned parties.

- 2) If the allegation against the respondent has not been proved, the Committee may recommend that no action needs to be taken in the matter.
- 3) If the Internal Committee arrives at the conclusion that the allegation against the respondent has been proved, it shall recommend to the Managing Director of the Company to take action for sexual harassment as misconduct. Such action will be taken within 60 days of the receipt of report.

XII. AWARENESS/NOTIFICATION

- 1) All the Employees, Agents, Customers, Vendors, Partners and Visitors shall have access to this Policy at any given point of time and clarification related to this Policy shall be addressed by the HR team.
- 2) A brief shall be given to all existing employees regarding the features of this Policy immediately on formulation of the Policy and to new employees in Veritas during their initial Induction.
- 3) 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 the workplace.
- 4) Company shall display the notice showing the name of the Internal Committee members at its every establishment at a conspicuous place.
- 5) Assistance would be provided to the woman if she so chooses to file a complaint in relation to the offence under the Indian Penal Code or any other law for the time being in force;
- 6) Sexual harassment will be treated as a misconduct under the service rules and appropriate action will be initiated for such misconduct

XIII. HR RESPONSIBILITIES

- a. Provide necessary facilities to the IC for dealing with the complaint and conducting an inquiry.
- b. Assist in securing the attendance of respondent and witnesses before the IC and make available such information to the IC in context of the complaint.
- c. The HR department may seek appropriate expert advice and arrange for help and support for the recipient in the form of counselling and / or medical attention.
- d. Company at regular intervals will sensitize the employees with the provisions of the 2013 Act and orientation/capacity building programmes for the members of the IC.
- e. Awareness to the employees on the constitution of IC and its role in dealing with complaints of sexual harassment.

XIV. FALSE ACCUSATIONS

An employee who knowingly makes an allegation of sexual harassment to the committee shall be subject to disciplinary action, including termination of employment, in accordance with company rules, policies and procedures. Further, this policy may not be used as a defense by an employee against

whom an adverse action has been taken by the company independent of any disclosure of information and for legitimate reasons or cause under company rules and policies.

XV. MISCELLANEOUS:

- 1) Company 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 with the Act. Any such alterations or amendment or rescinding will be intimated to the employee.
- 2) Nothing contained in these rules 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.
- 3) The Internal Committee shall prepare an annual report shall submit the same to the Company to include in its Annual report detailing number of complaints of sexual harassment received during the year, disposed off and pending cases.

XVI. CONCLUSION

Complaints relating to Sexual Harassment shall be handled and investigations will be conducted under the principles of natural justice, basis of fundamental fairness, in an impartial and confidential manner so as to protect the identity of all viz., the person bringing the charge, potential witnesses, and the person accused of improper behaviour. Also, all efforts shall be taken to ensure objectivity and thoroughness throughout the process of investigation.

The identity and address of the aggrieved person, respondent and witnesses must not be published or disclosed to the public or media.

The decision of Company shall be final and binding on all. However, the same is without prejudice to any recourse that Company or the individual concerned may have against the respondent and it shall not limit or restrict the rights of the Complainant and/or Company to pursue, nor shall they be precluded from pursuing, such further and other legal actions as may be available.