



**PREVENTION AND REDRESSAL OF SEXUAL
HARASSMENT AT WORKPLACE POLICY**
OF
HDB FINANCIAL SERVICES LIMITED
[CIN: U65993GJ2007PLC051028]

January 14, 2025

Document Control

Document Title	Prevention and Redressal of Sexual Harassment at Workplace Policy
Version	2.0
Effective Date	January 14, 2025
Document Owner	Human Resources
Document Approver	Board of Directors

Review

Version	Date	Author	Description
Final Version 1.7	May 13, 2020	Company Secretary	No Changes Proposed.
Final Version 1.8	April 16, 2022	Human Resources	No Changes Proposed.
Final Version 1.9	October 14, 2023	Human Resources	1. Vendors/ Service providers brought under the purview of POSH policy 2. Clarity on enquiry for men/transgender 3. Para on Composition of IC edited 4. Suspension of respondent during enquiry added 5. Enquiry procedure elaborated.
Final Version 2.0	January 14, 2025	Human Resources	No Changes Proposed.

Frequency of Review

Frequency of review is annual or at any intermediate instance as deemed necessary by the Human Resources Department.

Document Placement

Updated Policy will be posted on the Company's website at www.hdbfs.com.

Abbreviations used

Abbreviation	Full Description
HDBFS	HDB Financial Services Limited
POSH Act	The Sexual Harassment of Women at Workplace (Prevention, Prohibition, and Redressal) Act, 2013
IC	Internal Committee

1. Preface

HDB Financial Services Limited (hereinafter referred as the 'Company' or 'HDBFS') 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 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").

2. 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.

3. Scope

This policy is applicable to all employees of the Company including but not limited to personnel working within the premises of the Company. The Policy shall be applicable at all the offices of the Company including but not limited to any place visited by the employee arising out of or during the course of the employment including transportation provided by the Company for undertaking such journey.

Vendors / Sub-Contractor working out of HDB premises shall also abide and follow the provisions of policies, procedures and process as instructed by the Client and the Vendor shall also ensure the compliance of such policies, procedures and process by its personnel and may be subjected to any action, investigation by the Client directly or indirectly under such policies, procedures and process including but not limited to any disciplinary actions, actions under per the provisions of Prevention of Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 or any other law for the time being in force etc.

This policy is based on the Sexual Harassment of women at workplace (Prevention, Prohibition & Redressal) Act, 2013. Consequently, the complaint mechanism and reliefs as per this Policy are primarily focused on women. With respect to men and transgender, the redress of sexual harassment will be as per Code of Conduct and reliefs at discretion of the company and / or as per company policies.

4. Definitions

- "Sexual Harassment" includes any one or more of the following unwelcome acts, incidents or behaviour (whether directly or by implication) namely:
 1. Physical contact and advances; or
 2. A demand or request for sexual favours; or
 3. Making sexually coloured remarks; or
 4. Showing pornography; or
 5. Any other unwelcome physical, verbal or nonverbal conduct of sexual nature.
- Incident: means an incident of Sexual Harassment
- Employee: means a person employed at a workplace for any work on regular, temporary, 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.
- Employer/ Company: refers to the Managing Director and /or Head of Human Resource Function of the Company.

- Aggrieved Woman: means a woman, of any age whether employed or not, who alleges to have been subjected to any act of sexual harassment by the respondent.
- Respondent: A person against whom the aggrieved woman has made complaint under this Policy.
- Workplace: Includes all offices and branches of the Company, all instances reported within the Company and in any place visited by the employee arising out of or during the course of the employment including transportation provided by the Company for undertaking such journey.

5. Prevention of Sexual Harassment

No woman shall be subjected to sexual harassment at HDBFS.

The following circumstances, among other circumstances, if it occurs or is present in relation to or connected with any act or behaviour of sexual harassment may amount to Sexual Harassment:

1. Implied or explicit promise of preferential treatment in employment; or
2. Implied or explicit threat of detrimental treatment in employment; or
3. Implied or explicit threat about her / his present or future employment status.

6. Internal Committee (IC)

Composition, Tenure, Scope, Functioning, Quorum, Recommendations of the regional ICs shall be as mandated by the 2013 Act.

Any complaint received shall be reviewed by Internal Committee which is constituted region wise as follows.

1. INTERNAL COMMITTEE – WEST
2. INTERNAL COMMITTEE – NORTH
3. INTERNAL COMMITTEE – SOUTH
4. INTERNAL COMMITTEE – EAST

Investigation will be done by members of the internal committee as given below:

1. A presiding officer who shall be a woman employed at a senior level.
2. External Member.
3. Any other one member provided that at least 2 members of the Committee shall be Women.

Wherever necessary, the Internal Committee will appoint an Investigation Officer(s) for assisting inquiry into the reported complaint of sexual harassment. The Investigation Officer will generally be a responsible woman employee from Human Resources.

The Internal Compliance Members will hold office for a period of 3 years and will be eligible for reappointment for further terms and such revised list will be periodically announced and shared with all stakeholders.

7. Procedure to file Complaint

1. Any aggrieved person may make a complaint in writing (refer Annexure 1) to the IC within a period of three months from the date of incident & in case of series of incidents within a period of three months from the date of last incident. IC may extend the time limit by a further period of three months if it is satisfied that circumstances were such which prevented the person from filing a complaint within the said period.

2. Aggrieved person may also email the complaint (refer Annexure 1) addressed to the Presiding Officer at employee.support@hdbfs.com.

3. Where the aggrieved woman is unable to make a complaint on account of physical incapacity, a complaint may be filed by:

- Her relative or friend;
- Her co-worker; or
- An officer of the National Commission for Women or State Women's Commission; or
- Any person who has knowledge of incident, with the written consent of the aggrieved woman.

4. Where the aggrieved woman is unable to make a complaint on account of mental incapacity, a complaint may be filed by:

- Her relative or friend;
- A special educator;
- A qualified psychiatrist or psychologist; or
- The guardian or person under whose authority she is receiving treatment or care;
- Any person who has knowledge of incident jointly with anyone of the above persons.

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

8. Conciliation

The IC before initiating an inquiry into the Complaint and at the request of the aggrieved woman may take steps to settle the matter between her and respondent through conciliation, except monetary settlement.

IC shall record the settlement so arrived and forward the same to the employer to action on the specified recommendations and also provide the copies of the settlement to aggrieved woman and the respondent. Where the settlement is arrived at under the process of conciliation no further inquiry shall be conducted by the IC.

9. Inquiry into Complaint

In all cases where Conciliation failed or was not done, the IC shall proceed to make inquiry into the complaint in accordance with the 2013 Act, powers conferred by the 2013 Act and as per principles of natural justice.

a. Action during pendency of Inquiry

During the pendency of an inquiry, on a written or email request the IC may recommend the employer to:

1. Transfer the aggrieved woman or the respondent to any other workplace; or
2. Grant leave to the aggrieved woman up to a period of three months; or
3. Grant such other relief to the Aggrieved as may be prescribed.

The leave granted to the aggrieved woman shall be in addition to the leave she would otherwise be entitled. Suspension of respondent from company services pending inquiry or operating from home or be instructed to be on leave from work pending inquiry.

IC may recommend to the employer to restrain the respondent from reporting on the work performance of the aggrieved woman or writing her confidential report and assign the same to another officer.

Above recommendations may be done by the IC at the request of the complainant.

b. Inquiry Report

(i) Where the IC arrives at a conclusion that the reported incident/s against the respondent has not been proved, it shall recommend to the Company that no action is required to be taken with regard to the complaint.

(ii) Where the IC arrives at a conclusion that reported incident/s against the respondent has been proved, it shall recommend to the Company to take action for sexual harassment as 'misconduct' resulting in disciplinary action based on the Company policy.

(iii) The penalties listed below are indicative, and shall not constrain the Company from considering others, in accordance with the rules governing the workplace of the Company.

(iv) The penalties/ measures may include the following: written apology, warning, reprimand or censure, withholding of promotion, withholding of increments, terminating the respondent from service or undergoing a counselling session or carrying out community service

- The inquiry shall be completed within a period of 90 days.

- On the completion of the Inquiry the IC shall provide a report of findings to the employer within a period of 10 days from the date of completion of the inquiry and such report shall be made available to both the concerned parties, enabling them to make representation against the findings before IC.
- Where the allegation(s) against the respondent are established by the IC, the Company shall take appropriate action on the recommendation of the Committee within a period of 60 days.

c. Punishment for False or Malicious complaint & false evidence

1. Where the Internal Committee arrives at a conclusion that the allegation against the respondent is malicious or false, or the aggrieved woman or any other person has produced forged or misleading document, it will recommend to the Company to take action against the person who has made the complaint in accordance with the provisions of service rules applicable to her.

2. During the inquiry if the Internal Committee arrives at a conclusion that any witness has given false evidence or produced forged or misleading document, it will recommend to the Company to take action in accordance with the service rules applicable to him/ her or in the absence of service rules, as may be prescribed.

d. Preparation of Annual Report.

IC shall prepare an annual report in each calendar year and submit the same to the employer in the following manner:

1. Number of complaints of sexual harassment received during the year;
2. Number of complaints disposed off during the year;
3. Number of cases pending for more than ninety days;
4. Number of workshops or awareness programs against sexual harassment carried out;
5. Nature of action taken by the Employer.

10. Confidentiality

Any information relating to the contents of the complaint, the identity & addresses of the aggrieved woman, respondent & witnesses, conciliation, inquiry proceedings, recommendations of the Internal Committee & the action taken by the company, will not be published, communicated or made known to the public, press or media in any manner.

Where any person entrusted with the duty to handle the complaint, inquiry, recommendations or actions contravene with this clause, he/she will be liable for action as per Confidentiality clause in the service rules applicable to him/her.

The provisions of Right to Information Act, 2005 shall not be applicable.

11. Management Responsibilities

- a) Display the policy on the Company's intranet with names and contact details of all members of the IC.
- b) Provide necessary facilities to the IC for dealing with the complaint and conducting an inquiry.
- c) 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.
- d) Provide assistance and initiate action to the aggrieved woman if they so choose to file a complaint against the respondent in relation to the offence under the IPC or any other law for the time being in force;
- e) Treat sexual harassment as misconduct under the code of conduct and initiate action for such misconduct;
- f) Management on the recommendation of the complaints committee and / or 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.
- g) Information pertaining to the number of cases filed and their disposal, as applicable to be included in the Annual Report of the Company.
- h) Company will organise workshops and awareness programmes at regular intervals for sensitizing the employees with the provisions of the 2013 Act and orientation/capacity building programmes for the members of the IC.
- i) Display at any conspicuous place at the workplace' the penal consequences of sexual harassments; and the constitution of IC.

Annexure 1 – Incident Reporting Format

Annexure 1 - Incident Reporting Format	
1	Date of Filing Complaint <input style="width: 150px;" type="text"/>
2	Details of Complainant: Name: <input style="width: 100px;" type="text"/> Emp Code: <input style="width: 100px;" type="text"/> Location: <input style="width: 100px;" type="text"/> Department: <input style="width: 100px;" type="text"/>
3	Complaint Made Against: Name: <input style="width: 100px;" type="text"/> Emp Code: <input style="width: 100px;" type="text"/> Location: <input style="width: 100px;" type="text"/> Department: <input style="width: 100px;" type="text"/>
4	Nature of Harassment (Tick as Applicable) Verbal <input type="checkbox"/> Visual <input type="checkbox"/> Physical <input type="checkbox"/> Others <input type="checkbox"/>
5	If Others, pls specify: <input style="width: 150px;" type="text"/>
6	Description of the Incident Date: <input style="width: 150px;" type="text"/> Time: <input style="width: 150px;" type="text"/> Place: <input style="width: 150px;" type="text"/> Witnesses: <input style="width: 150px;" type="text"/> Sequence of Events: <input style="width: 150px; height: 40px;" type="text"/>
7	Signature of the Complainant: <input style="width: 100px; height: 20px;" type="text"/>
8	<i>(To be Filled by Internal Committee)</i> Findings of the Internal Committee: <input style="width: 150px; height: 40px;" type="text"/> Recommendations of the Internal Committee: <input style="width: 150px; height: 40px;" type="text"/>
9	Signature of Members: Presiding Officer: <input style="width: 150px;" type="text"/> Member 1: <input style="width: 150px;" type="text"/> Member 2: <input style="width: 150px;" type="text"/> Member 3: <input style="width: 150px;" type="text"/> Member 4: <input style="width: 150px;" type="text"/>