

Seeds Fincap Private Limited		
Policy Name	Prevention of Sexual Harassment at Workplace Policy	
Prepared by	Raj Kumar Anand, Head Vigilance	
Reviewed by	Sumeet Dhall, Head Accounts	
Approved by	Subhash Chandra Acharya, Managing Director & CEO	
Amended on	30 th June 2023	
Review Date	30 th June 2024	

Prevention of Sexual Harassment at Workplace Policy was approved by Board of Directors at the Board Meeting held on 27th June 2023.

PREVENTION OF SEXUAL HARASSMENT AT WORKPLACE POLICY

OBJECTIVES

Seeds Fincap Private Limited is an equal employment opportunity provider and does not discriminate its employees on the grounds of gender and believes in providing a non-hostile safe working environment to all its employees especially to its female employees.

Anti-Sexual harassment policy of Seeds Fincap Private Limited is a statement by the company stating that Seeds as a company will not tolerate or allow any sexual harassment by any manager, supervisor, co-worker, client/customer/vendor or any other person that the employee of the organization comes with in the course of work or business of the company.

COVERAGE

All employees of Seeds Fincap Pvt. Ltd.

SALIENT FEATURES

As sexual harassment is an offence to the dignity of the individual, it constitutes an obstacle to an efficient environment in which men and women work together, we have set guidelines and procedures to be followed at such instances occurring at the place of work.

DEFINITION

Sexual harassment includes such unwelcome sexually determined behaviour (whether directly or by implication) as:

- Physical contact and advances
- A demand or request for sexual favours
- Sexually coloured remarks
- Any other unwelcome physical, verbal or non-verbal conduct of sexual nature.

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

- Implied or explicit promise of preferential treatment in employment: or
- Implied or explicit threat of detrimental treatment in employment: or
- Implied or explicit threat about present or future employment status: or
- Interference with work or creating an intimidating or offensive or hostile work environment; or
- Humiliating treatment likely to affect health or safety.

POLICY GUIDELINES

- As sexual harassment is regarded as misconduct, it is the duty of management and employees to take active steps to ensure that female employees are not subjected to this form of degradation in the workplace.
- In the case of any allegation of sexual harassment, whether or not it is found to be an incident of sexual harassment, management must ensure that any victimization that may later result from lodging the complaint is dealt with most severely. Disciplinary steps will be taken against personnel who victimize or intimidate a complainant.

All information must be treated with the utmost confidentiality. Parties involved in an allegation of sexual harassment are, in their own best interest, advised not to discuss the matter with colleagues who are not involved and who are not representing them in the matter.

COMPLAINT REDRESSAL COMMITTEE

A Committee known as “Internal Complaints Committee” (ICC) has been constituted by the Management to consider and redress complaints of Sexual Harassment

A committee of minimum 3 members, majority of which will be women, is constituted for the proceedings to take place. In case of non-availability of quorum members due to exigency of official work, it shall be the responsibility of HR to get the complaint investigated.

Details of Committee members:

S. No.	Name	Role	Designation	Department	Email ID	Contact No.
1	Smita Premchander	Chairperson	Independent Director	Board of Director	smitapremchander@gmail.com	9099013203
2	Swati Sinha	Committee Member	Head Credit	Credit	swati.sinha@seedsfincap.com	9311700923
3	Raj Kumar Anand	Committee Member	Head Vigilance	Vigilance	raj.anand@seedsfincap.com	9311700966
4	Meenakshi Thakur	Committee Member	AVP Finance	Finance	meenakshi.thakur@seedsfincap.com	9311797713
5	Manmath Sahoo	Committee Member	Sr. Manager	Human Resource	manmath.shahoo@seedsfincap.com	9311700907

Note: Additionally, external women member from non-government organizations or associations or free lancers committed to the cause of women will be a part of above committee.

LODGING A COMPLAINT

1. If the Aggrieved Person is unable to make a complaint on account of its 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, in case the aggrieved person is a woman; or d. any person who has knowledge of the incident, with the written consent of the Aggrieved Person.

2. If the Aggrieved Person is unable to make a complaint on account of its 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 he/she is receiving treatment or care; or e. any person who has knowledge of the incident jointly with the Aggrieved Person's relative or friend or a special educator or qualified psychiatrist or psychologist, or guardian or authority under whose care he/she is receiving treatment or care.

3. If the Aggrieved Person 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 his/her written consent.

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

• REDRESSAL PROCESS

Any employee who feels and is being sexually harassed directly or indirectly may submit a written complaint of the alleged incident to any member of the Committee at posh.complaints@seedsfincap.com

in writing with his/her signature immediately within a period of 3 months from the date of incident and in case of series of incidents, within a period of 3 months from the date of 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.

- The Committee will hold a meeting with the complainant within 3 days of receipt of complaint of the incident.
- The Committee shall call upon all witnesses mentioned by both the parties.
- If the Complainant desires to tender any documents by way of evidence before the Committee, she/he can submit original copies of such documents. Similarly, if the person against whom complaint is made desires to tender any documents in evidence before the Committee he/she shall supply original copies of such documents.
- The Committee shall complete the "Investigation" within reasonable period but not beyond 15 days and communicate its findings and recommendations to Managing Director.
- On the recommendation of the Committee an appropriate action will be taken by ICC.

Protection against Victimization

The following will be obligations of the Company, during the processing/investigation of the Complainant:

- In the event the Accused is the Complainant's Reporting Manager/senior, the Company will review the possibility of relocating the employee within the Company and ensure that the Complainant is not being evaluated by the Accused.
- Ensure that any sort of retaliation against the Complainant or witnesses is strictly prohibited. Any act of reprisal, including internal interference, coercion and restraint, by the Accused, whether directly or indirectly, will result in appropriate action against the Accused by the Complaints committee in consultation with the Management.
- In case the Accused is a third party interacting with the company, such accused shall not be allowed to enter the company premises except for the purpose of attending any meeting/interaction as and when required by the Complaints Committee

Post Conclusion of the Investigations of the Complaint, the Company will observe the following:

- If the Accused is found to be guilty, the Accused shall not write the evaluation/reports of the Complainant, if he/she is otherwise authorized to do so and the accused may be suspended for such term or may be terminated as per the discretion of the ICC on case-to-case basis.
- In case the Accused is a third party interacting with the company, and found to be guilty, the Accused shall not be allowed to enter the Company premises.
- In the event, the Complaints Committee after investigation of a Complaint in accordance with the procedure prescribed herein, concludes that the Complaint was false and made with mollified intention by the Complainant, then the Complaints Committee shall take such appropriate measures, in consultation with the Management, against the complaint, as it may deem necessary.

Resolution procedure through conciliation

Once the complaint is received, before initiating the inquiry, the committee may take steps to conciliate the complaint between the complainant and the respondent. This is only if requested by the aggrieved person.

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.

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 person of maximum 3 months, in addition to the leave he/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.

Criminal Proceedings

In case the act under sexual harassment amounts to a specific offence under the Indian Penal code, 1860 or under any other applicable law, the Management shall initiate appropriate action, in accordance with law, by making a complaint with the appropriate authority.

Malicious Allegations

Where the committee arrives at the conclusion that the allegation against the respondent is malicious or the aggrieved person or any other person making the complaint has made the complaint knowing it to be false or the aggrieved person 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 person 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.

Awareness

Awareness sessions are to be organized to:

- Formulate and widely disseminate an internal policy or charter or resolution or declaration for prohibition, prevention and redressal of sexual harassment at the workplace intended to promote gender sensitive safe spaces and remove underlying factors that contribute towards a hostile work environment
- Carry out orientation programs and seminars for the Members of the ICC.
- Conduct capacity building and skill building programs for the Members of the ICC.
- Declare the names and contact details of all the Members of the ICC.
- Use modules developed by the State Governments to conduct workshops and awareness programs for sensitizing the employees with the provisions of the Act.

Legal Compliance

Information about the following should be included in the Annual Report of the Company in year.

- 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

Modification and Review of the Policy

- The Company reserves the right to modify and, or, review the provisions of this Policy, so as to comply with applicable legal requirements, internal policies, or with a view to align/after the provisions of the policy to the extent deemed necessary by company from time to time.
- Seeds expects the cooperation of all personnel in making this policy work. The company's intent in preparing, implementing, and distributing this policy is to help ensure compliance with state and local laws. This policy is not intended to impose any contractual obligations on the company or any of its personnel. Questions about this policy should be directed to Human Resources.