



**PREVENTION OF SEXUAL HARASSMENT AT
WORKPLACE POLICY**

SEEDS FINCAP PRIVATE LIMITED



APPROVED IN THE BOARD MEETING HELD ON 30TH APRIL 2024



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OBJECTIVES

Seeds Fincap Private Limited ('Seeds'), as Company respects the dignity of all employees working for the Company irrespective of the hierarchy and we expect responsible conduct and behaviour on the part of all level but not limited to the office premises and other locations directly related to Company's business.

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

This policy applies to all categories of employees of the Company, including permanent management and workforce, temporary employees, trainees and employees on contract at its workplace.

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

"Aggrieved Person" means a person in relation to workplace whether employed or not, who alleges to have been subject to any act of sexual harassment by the Respondent.

"Internal Complaint Committee" means a committee constituted by Company for a period of three years to address all complaint of Sexual harassment filed by employees. Complaint by guests or vendors against employees that arises at the workplace will also be redressed the committee. The committee is responsible for providing resolution, settlement, or prosecution in response to the complaint received.

"Respondent" means a person against whom the aggrieved woman has made a complaint, including any external person, who have been alleged committing the offence within the premises of the company or extended premises of the company such as an external training facility arranged by the company or while travelling on official duty or travelling in a company provided vehicle etc

"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
- 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:



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- Implied or explicit promise of preferential treatment in employment; or
- Implied or explicit threat of detrimental treatment in employment; or
- Implied or explicit threat of 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.

“Workplace” includes any department, organisation, undertaking, establishment, enterprises institution, office or branch units of the Company. 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.

POLICY GUIDELINES

- As sexual harassment is regarded as misconduct, it is the duty of management and employees to take active steps to ensure that 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

The Company has instituted an **“Internal Complaints Committee” (ICC)** for redressal of sexual harassment complaint (made by the survivor) and for ensuing time-bound treatment of such complaint.

In accordance with the sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, the Internal Complaints Committee will comprise of the following:

- a. A woman employee employed at a senior level amongst the employees shall act as Presiding officer of the committee.
- b. One member from branch having ten or more employees.
- c. One member from the Legal/Human Resources Department.
- d. One external member shall be from amongst Non-governmental organizations OR associations OR a Lawyer committed to the cause of women.

The Name of the Members of the Internal Complaints Committee is as per **Annexure A** of this Policy and any change in such Annexure A will be done internally & not require any Board approval. shall be affected in the policy.



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LODGING A COMPLAINT

1. If the Aggrieved Person is unable to make a complaint on account of their 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 their 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.

MODE OF COMPLAINT

The complaint must be in writing and can be filled via email, letter or electronic mode of communication, however in case the complaint has been received via electronic communication, formal written complaint has to be submitted with the ICC prior to the enquiry in the format provided in **Annexure- B**.

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 7 working 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 30 working days and communicate its findings and recommendations to Managing Director.
- On the recommendation of the Committee an appropriate action will be taken by the HR deptt.



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PROTECTION AGAINST VICTIMIZATION

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

- In the event the Respondent 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 Respondent.
- 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 Respondent, whether directly or indirectly, will result in appropriate action against the Respondent by the Complaints committee in consultation with the Management.
- In case the Respondent is a third party interacting with the company, such respondent 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 Respondent is found to be guilty, the Respondent shall not write the evaluation/reports of the Complainant, if he/she is otherwise authorized to do so and the respondent 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 Respondent is a third party interacting with the company, and found to be guilty, the Respondent shall not be allowed to further dealing with the Company and 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 maleficent 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 (paid leave, if respondent found guilty) 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.



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

MANNER OF TAKING ACTION AGAINST THE RESPONDENT

Where the Complaints Committee arrives at the conclusion that the allegation against the respondents have been proved, it shall recommend to the employer to take action which may include the following:

- a. Written apology;
- b. Warning;
- c. Reprimand or Censure;
- d. Withholding of Promotion;
- e. Withholding of pay rise or increments; or
- f. Terminating the respondent from service; or
- g. Undergoing a counselling session or carrying out community service.
- h. Any other punishment according to the service rules applicable to the respondent. (inclusive of legal charges)

If the allegation against the respondent has not been proved, the Committee may recommend that no action needs to be taken in the matter.

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 respondent 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.

The Company will do everything consistent with enforcement of this policy and with the law to protect the privacy of the individual involved and to ensure that the aggrieved and the respondent are treated fairly. Any person (including witnesses) who breaches confidentiality shall be subject to serious disciplinary action.

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.

PROACTIVE MEASURES TO BE INITIATED BY THE COMPANY

Awareness sessions are required to be periodically organized by the Company to:

- Formulate and widely disseminate an internal policy or charter or resolution or declaration for awareness of all employees to ensure 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.
- Conduct regular awareness program for the employees about this policy.
- 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.
- ICC details as well as brief details of this Policy need to be displayed on the notice board of all the branches.

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
- Details of yearly mandatory POSH trainings for all employees.



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 (hr@seedsfincap.com).

ANNEXURE – A

**COMPOSITION OF INTERNAL COMPLAINTS
COMMITTEE AT HO LEVEL**

S. No	Name	Capacity	Email	Telephone	Designation
1	Smita Premchander	Independent Director	smitapremchander@gmail.com	9099013203	Presiding Officer
2	Avishek Sarkar	Whole Time Director	avishek.sarkar@seedsfincap.com	9311700903	Internal Member
3	Swati Sinha	Credit Head	swati.sinha@seedsfincap.com	9311700923	Internal Member
4	Meenakshi Thakur	VP-Finance	meenakshi.thakur@seedsfincap.com	9311797713	Internal Member
5	Shefali Paul	External Member	shefalipaul26@gmail.com	7678457233	External Member

**COMPOSITION OF INTERNAL COMPLAINTS
COMMITTEE FOR HARYANA**

S. No	Name	Capacity	Email	Telephone	Designation
1	Swati Sinha	Credit Head	swati.sinha@seedsfincap.com	9311700923	Presiding Officer
2	Ganesh Sahay Saini	Regional Sales manager	ganesh.saini@seedsfincap.com	9311720111	Internal Member
3	Sweety Awasthi	Assistant Manager-HR	sweety.awasthi@seedsfincap.com	9311951256	Internal Member
4	Shefali Paul	External Member	shefalipaul26@gmail.com	7678457233	External Member

**COMPOSITION OF INTERNAL COMPLAINTS
COMMITTEE FOR RAJASTHAN**

S. No	Name	Capacity	Email	Telephone	Designation
1	Swati Sinha	Credit Head	swati.sinha@seedsfincap.com	9311700923	Presiding Officer
2	Gautam Kumar Sharma	Regional Sales Manager	gautam.kumar@seedsfincap.com	9414083795	Internal Member
3	Sweety Awasthi	Assistant Manager-HR	sweety.awasthi@seedsfincap.com	9311951256	Internal Member
4	Shivani Mishra	External Member	mishrashivani1707@gmail.com	9560473623	External Member



**COMPOSITION OF INTERNAL COMPLAINTS
COMMITTEE FOR UTTAR PRADESH**

S. No	Name	Capacity	Email	Telephone	Designation
1	Swati Sinha	Credit Head	swati.sinha@seedsfincap.com	9311700923	Presiding Officer
2	Akhilesh Sharma	Sr. Regional Sales manager	akhilesh.sharma@seedsfincap.com	9311700948	Internal Member
3	Sweety Awasthi	Assistant Manager-HR	sweety.awasthi@seedsfincap.com	9311951256	Internal Member
4	Shefali Paul	External Member	shefalipaul26@gmail.com	7678457233	External Member

**COMPOSITION OF INTERNAL COMPLAINTS
COMMITTEE FOR MADHYA PRADESH**

S. No	Name	Capacity	Email	Telephone	Designation
1	Swati Sinha	Credit Head	swati.sinha@seedsfincap.com	9311700923	Presiding Officer
2	Ankit Bukhariya	Business Head	ankit.bukhariya@seedsfincap.com	8224900035	Internal Member
3	Sweety Awasthi	Assistant Manager-HR	sweety.awasthi@seedsfincap.com	9311951256	Internal Member
4	Shivani Mishra	External Member	mishrashivani1707@gmail.com	9560473623	External Member

**COMPOSITION OF INTERNAL COMPLAINTS
COMMITTEE FOR GUJRAT**

S. No	Name	Capacity	Email	Telephone	Designation
1	Swati Sinha	Credit Head	swati.sinha@seedsfincap.com	9311700923	Presiding Officer
2	Ankit Bukhariya	Business Head	ankit.bukhariya@seedsfincap.com	8224900035	Internal Member
3	Sweety Awasthi	Assistant Manager-HR	sweety.awasthi@seedsfincap.com	9311951256	Internal Member
4	Shivani Mishra	External Member	mishrashivani1707@gmail.com	9560473623	External Member



**COMPOSITION OF INTERNAL COMPLAINTS
COMMITTEE FOR UTTARAKAND**

S. No	Name	Capacity	Email	Telephone	Designation
1	Swati Sinha	Credit Head	swati.sinha@seedsfincap.com	9311700923	Presiding Officer
2	Brijesh Singh	Regional Sales manager	brijesh.singh@seedsfincap.com	8882435194	Internal Member
3	Sweety Awasthi	Assistant Manager- HR	sweety.awasthi@seedsfincap.com	9311951256	Internal Member
4	Shivani Mishra	External Member	mishrashivani1707@gmail.com	9560473623	External Member

**COMPOSITION OF INTERNAL COMPLAINTS
COMMITTEE FOR PUNJAB**

S. No	Name	Capacity	Email	Telephone	Designation
1	Swati Sinha	Credit Head	swati.sinha@seedsfincap.com	9311700923	Presiding Officer
2	Bhanu Goyal	Regional Sales manager	bhanu.goyal@seedsfincap.com	9311594708	Internal Member
3	Sweety Awasthi	Assistant Manager- HR	sweety.awasthi@seedsfincap.com	9311951256	Internal Member
4	Shefali Paul	External Member	shefalipaul26@gmail.com	7678457233	External Member

**COMPOSITION OF INTERNAL COMPLAINTS
COMMITTEE FOR BIHAR**

S. No	Name	Capacity	Email	Telephone	Designation
1	Swati Sinha	Credit Head	swati.sinha@seedsfincap.com	9311700923	Presiding Officer
2	Ram Prakash Maurya	Regional Sales manager	ramprakash.maurya@seedsfincap.com	9116052206	Internal Member
3	Sweety Awasthi	Assistant Manager- HR	sweety.awasthi@seedsfincap.com	9311951256	Internal Member
4	Shivani Mishra	External Member	mishrashivani1707@gmail.com	9560473623	External Member





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ANNEXURE- B

Name of Complainant:
Employee Id:
Department:
Branch:
Date of Complaint:
Name of Respondent:
Department (if applicable):
Branch (if applicable):
Description of Complaint:

