

EQUITAS HOLDINGS LIMITED

PREVENTION OF SEXUAL HARASSMENT

AT THE WORKPLACE

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1. Objective

At Equitas Holdings Limited (EHL), we believe in the right of all its employees to work with dignity, in a safe and secure environment and all are expected to treat their co-workers with respect, dignity and in a professional manner. To this end, the objective of this policy is to provide all employees of EHL with a safe work environment, free from sexual harassment.

It is the policy of the Company that all employees are responsible for ensuring that the work place is free from sexual harassment. Because of EHL's strong disapproval of offensive or inappropriate sexual behaviour at work, all employees must avoid any action or conduct which could be viewed as sexual harassment.

We have framed and adopted a policy on sexual harassment in accordance with the Vishaka Guidelines laid down by the Hon'ble Supreme Court of India. Pursuant to the enactment of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, incorporating the requirements as mandated by the law. EHL reserves the right to amend or update this Policy as required from time to time.

2. Applicability

This policy shall be applicable to all employees of EHL herein after called the 'Company', at all levels.

3. Prohibition of Sexual Harassment at the Workplace:

The Company does not tolerate sexual harassment at any of its workplaces (as defined in this Policy) and views any incident of sexual harassment at the workplace very seriously. Sexual harassment at any workplace of the Company is a misconduct which will be dealt with by the Company in accordance with this Policy.

4. What is Sexual Harassment

Sexual harassment includes any one or more of the following unwelcome acts or behaviour (whether directly or by implication):

- i. physical contact or advances; or
- ii. a demand or request for sexual favours; or
- iii. making sexually coloured remarks; or
- iv. showing pornography; or
- v. any other unwelcome physical, verbal or non-verbal conduct of sexual nature.

In addition, the following circumstances (amongst others) if it occurs or is present in connection with an act or behaviour of sexual harassment, may also amount to sexual harassment:

- i. implied / explicit promise of preferential treatment of the victim in her employment;
- ii. implied / explicit threat of detrimental treatment of the victim in her employment;
- iii. implied / explicit threat about the victim's present or future employment status;
- iv. interference with the victim's work or creating an intimidating, offensive or hostile work environment for the victim; or
- v. humiliating treatment likely to affect the victim's health or safety.

This list is illustrative and not exhaustive. In case of any doubts as to whether any particular conduct amounts to sexual harassment, please contact (Internal Complaints Committee (ICC) or HR Head) for clarifications.

5. Who is an Employee?

For the purposes of this Policy, all persons employed at any workplace of the Company for any work on a regular, temporary, ad hoc, or daily wage basis, either directly or through an agent (including a contractor), employed with or without the knowledge of the Company, whether for remuneration or not, or working on a voluntary basis or otherwise, whether the terms of employment are express or implied are "employee(s)" of the Company, and includes a co-worker, a contract worker, probationer, trainee, apprentice or any person so employed at a workplace called by any other such name.

6. What is the Workplace?

For the purposes of this Policy, the workplace includes the following:

- i. all establishments, offices, administrative units or other premises from where the Company conducts its business;
- ii. any site away from the Company's premises where any activity related to the Company's business is organized, or arranged for, by the Company; and
- iii. any place visited by an employee arising out of or during the course, of employment, including any transportation provided by the Company for undertaking such journey.

7. Committee to Investigate Complaints of Sexual Harassment

The Company shall establish an Internal Complaints Committee(s) for dealing with complaints of sexual harassment at the workplace in accordance with the requirements of applicable law. Reference to "the Committee" in this Policy shall mean the particular committee nominated for the particular establishment.

The members of the Committee will hold office for the term as notified by the Company, which term shall not exceed three years from the date of their appointment. A woman member shall always be the presiding officer of the Committee and not less than half of the members of the Committee shall be women. The Executive Director & Chief Executive Officer shall nominate the members of the Committee and the particulars of the members including the contact details will be available in the Employee portal of the Company.

8. How to Lodge a Complaint with the Committee

The Committee, normally, will not investigate anonymous complaints.

- i. Send an email to nirbhaya@equitasbank.com with full details.
- ii. The complainant may also submit a complaint of the alleged incident to the Committee, in writing, not later than three (3) months of the date of occurrence of the incident, and in case of a series of incidents, not later than three (3) months from the date of occurrence of the last incident.

This time limit may be extended for a further period of three (3) months if the Committee is satisfied that the circumstances were such that it prevented the complainant from filing a complaint within the specified timeline. The procedures followed by the Committee while investigating all complaints & the interim measure of protection are detailed in the POSH guidelines available in our employee portal.

9. Recommendations of the Committee

- i. The Committee shall recommend suitable disciplinary action against the offender if found the complaint is true and substantiated. The Management shall take a necessary exemplary action to prevent such instances in future.

- ii. Action against False or Malicious Complaint

If the Committee finds that the allegations against the respondent are malicious or that the complainant made the complaint knowing it to be false or if the complainant produces any forged or misleading document, the Committee shall, if malicious intent on the part of the complainant is established as part of the inquiry, recommend that appropriate disciplinary action be taken against the complainant, which action may include one or more of the disciplinary actions as permissible.

Mere inability to substantiate a complaint or provide adequate proof need not attract action against the complainant.

- iii. The committee will be guided by the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 in gathering evidences and recommending action.

10. Confidentiality

In the course of the inquiry into the complaint, the Committee shall limit disclosure of the details of the complaint to the extent practicable. The identity and other details of the complainant, respondent and witnesses, all the details of the inquiry proceedings including the conciliation, the recommendations of the Committee and the action taken by the Management shall be kept confidential by the Company, the members of the Committee, the complainant, the respondent, the witnesses (if any) and any others who may have knowledge of the complaint or its investigation.

This does not however prohibit the Management from disseminating information about justice secured to any victim of sexual harassment without disclosing any particulars which will lead to identification of the victim or the witnesses. Any person who violates the requirement for confidentiality may be subject to disciplinary action in accordance with the disciplinary rules applicable to such person.

11. No Victimization

An employee lodging a complaint under this Policy in good faith and any person who provides information or evidence as part of an inquiry pursuant to this Policy will be protected from any retaliation, reprisal or discrimination as a result thereof. Any unwarranted pressure, retaliatory or any other type of unethical behaviour by the respondent or any person on behalf of the respondent against the complainant or a witness may be reported to the Committee. Such complaints shall also be investigated by the Committee and the Committee may recommend appropriate disciplinary action if such complaint is found to be genuine.

12. Reference to POSH guidelines available in the Employee portal for further details on the following

- i. Procedure followed by the committee
- ii. Interim measures to protection of complainant
- iii. Other recommendations of the committee
- iv. Management action
- v. Other remedies
- vi. Other duties of the committee
- vii. Roles and responsibilities of HR Head
- viii. Other guidelines

13. Notification

All department heads are required to notify and communicate the existence and contents of this policy to the employees of their department. Every departmental head shall submit a certificate duly signed by him to the Compliance Officer that this policy was notified to each employee of his department. The new employees shall be informed about the policy by the HR department during the induction program.

This policy as amended from time to time shall be made available at the internet site of the Company which is accessible to its employees.

14. Review

The Policy will be reviewed as and when required by law.