



CIN : U65910TN1985PTC128456

Valar Aditi Social Finance Private Limited

(A Micro Finance Initiative)

PREVENTION OF SEXUAL HARASSMENT AT WORKPLACE (POSH) POLICY

(approved by the Board of Directors at the meeting held on 26th September, 2023)

COMMITMENT

Valar Aditi Social Finance Private Limited ("VASFPL") is committed to provide a work environment that ensures every woman employee is treated with dignity and respect and afforded equitable treatment. VASFPL is also committed to promote a work environment that is conducive to the professional growth of its women employees and encourages equality of opportunity. VASFPL will not tolerate any form of sexual harassment and is committed to take all necessary steps to ensure that its women employees are not subjected to any form of harassment.

SCOPE

This policy applies to all categories of employees of VASFPL, including permanent employees, temporaries, trainees and employees on contract at its workplace. VASFPL will not tolerate sexual harassment, if engaged in by customers or any other business associates. The workplace includes:

- (a) All offices or other premises where VASFPL's business is conducted
- (b) All company-related activities performed at any other site away from the VASFPL's premises.
- (c) Any social, business or other functions where the conduct or comments may have an adverse impact on the workplace or workplace relations.

DEFENITION:

- (a) "Act" means The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and the rules framed there under.
- (b) "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.
- (c) "Company" means Valar Aditi Social Finance Private Limited.
- (d) "employee" means a person employed at a workplace for any work on regular, temporary, 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;
- (e) "Internal Complaints Committee" means a committee constituted by VASFPL as per this Policy;
- (f) "Respondent" means a person against whom the aggrieved person has made a complaint.
- (g) "Sexual Harassment" includes any one or more of the following unwelcome acts or behavior (whether directly or by implication) such as:
 - (i) Physical contact and advances; or
 - (ii) A demand or request for sexual favors; or

- (iii) Making sexually colored remarks; or
- (iv) Showing any 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.
- (h) "workplace" includes any department, organization, undertaking, establishment, enterprise institution, 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.

INTERNAL COMPLAINTS COMMITTEE

The Company has constituted a Internal Complaint Committee (ICC) for redressal of sexual harassment complaint (made by the victim) and for ensuring time bound treatment of such complaints. Till further notice, the Internal Complaint Committee will comprise of the following members:

1. Ms. M.Devibala, Trustee, Joseph Development Trust
2. Mrs. R.Manjula, Branch Manager
3. Mrs. R.Ananthi, Branch Manager.
4. Mrs. K.Maheswari, Field Officer
- 5.Mrs.N.Rohini, MIS Coordinator.

The Internal Complaint Committee is responsible for:

1. Investigating every formal written complaint of sexual harassment
2. Taking appropriate remedial measures to respond to any substantiated allegations of sexual harassment.

Every complaint received shall be forwarded to Internal Complaint Committee (ICC) formed under the policy for redressal. The investigation shall be carried out by Internal Complaints Committee constituted for this purpose.

REDRESSAL AND ENQUIRY PROCESS

1.Any Team Member who feels and is being sexually harassed directly or indirectly may submit a complaint of the alleged incident in writing to hr@valaraditi.in or grievance@valaraditi.in or any member of the internal complaint committee mentioned herein immediately, but no later than three months of the occurrence of the incident. If the initial complaint is made to a person other than a committee member, upon receiving such a complaint, it will be the responsibility of the complaint receiver to report the same to the committee immediately.

2. The committee will maintain the record of the complaints received by it and keep the contents confidential, if it is so desired, except to use the same for discreet investigation.

3. At the first meeting, the committee members shall hear the complainant and record her/his allegations. The complainant can also submit any corroborative material with documentary proof, oral or written material, etc., to substantiate her/ his complaint.

4. The committee shall prepare and hand over the Statement of Allegation to the respondent and give her/him an opportunity to submit a written explanation if she/he so desires within one day of receipt of the same. The Respondent can also ask for an extension if needed.

5.The complainant shall be provided with a copy of the written explanation submitted by the respondent.

6. If the complainant or respondent desires any witness/es to be called, they shall communicate in writing the committee the names of witness/es whom they propose to call.

7. Thereafter, the respondent may be called to give an explanation before the committee, and an opportunity will be given to her/ him to give an explanation. If the respondent desires to tender any documents in evidence before the committee, she/he shall supply original copies of such documents. The respondent shall affix her/his signature on the respective documents to certify these to be original copies.

8. The committee shall call upon all witnesses mentioned by both the parties.

9. The committee shall provide every reasonable opportunity to the complainant and to the respondent, for putting forward and defending their respective cases.

10. The committee shall complete the "Enquiry" within a reasonable period but not beyond three months and communicate its findings and recommendations for action to the HR - Head. The report of the committee shall be treated as an inquiry report based on which the respondent can be awarded appropriate punishment straightaway.

ACTION

1. The Committee shall on completion of the enquiry provide a report of its findings 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 Complaints Committee arrives at the conclusion that the allegation against the respondent has been proved, or if such complaint is proved to be false or malicious, it shall recommend to take action for sexual harassment as a misconduct and this may include:

(a) Counseling,

(b) Warning,

(c) Written apology to the complainant,

(d) Withholding of promotions / increments,

(e) Transfer from present location,

(f) Suspension,

(g) Termination / dismissal from employment,

(h) Any other action that the employer may deem fit.

AWARENESS

1. All employees 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 the Company during their initial Induction.

3. The Company shall display the notice showing the name of the Internal Complaints Committee members at its every establishment at a conspicuous place.

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 will 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.

LEGAL COMPLIANCE

The Internal Complaint Committee shall in each calendar year prepare an annual report with the following details

- (a) Number of complaints of sexual harassment received during the year
- (b) Number of complaints disposed off during the year
- (c) Number of cases pending for more than 90 days
- (d) Number of workshops or awareness program against sexual harassment carried out
- (e) Nature of action taken by the employer.

CONCLUSION

In conclusion, the Company reiterates its commitment to providing its women employees, a workplace free from harassment/ discrimination and where every employee is treated with dignity and respect.