

Policy on Prevention from Sexual Harassment

A. Objective

Infina Finance Private Limited believes that you should be afforded the opportunity to work in an environment free of sexual harassment. All employees have the right to work in an environment free from all forms of discrimination and conduct which can be considered harassing, coercive, or disruptive, including sexual harassment. In Infina, anyone engaging in harassing conduct will be subject to discipline, ranging from a warning to termination.

B. Applicability of Policy on Prevention of Sexual Harassment

1. This policy is applicable to any women present within the premises.
2. This policy is in line with the provisions under The Sexual Harassment of Women at Workplace (Prevention, Prohibition, & Redressal) Act, 2013 (hereinafter referred to as SHW Act) and Rules framed thereunder from time to time.

C. Definitions & Abbreviations

1. In this policy document, the words and expressions listed below shall have to be following meanings:
 - i. AW – Aggrieved Woman – refers to any woman who has lodged a complaint of sexual harassment at workplace.
 - ii. RP – Respondent Person – Refers to any person against whom the complaint has been lodged by AW.
 - iii. Workplace – includes all offices and branches in India. It also includes any place visited with the employee or arising out of or during the course of employment/work including transportation provided by the Company for undertaking the journey.
2. Sexual Harassment – The definition of sexual harassment will be as defined in section 2 (n) of SHW Act as represented below:
 - i. “Sexual Harassment” includes any one or more of the following unwelcome acts or behavior (whether directly or by implication) namely:
 - a. Physical contact and advances; or
 - b. A demand or request for sexual favors; or
 - c. Making sexually colored remarks; or
 - d. Showing pornography; or
 - e. Any other unwelcome physical, verbal or non-verbal conduct of sexual nature or
 - f. Other sexually oriented conduct which is offensive or objectionable to the recipient, including, but not limited to epithets, derogatory or suggestive comments, slurs, or gestures and offensive posters, cartoons, pictures, or drawings, email messages or SMS/MMS, etc.
 - ii. The following circumstances, among other circumstances, if it occurs, or is present, in relation to or connected with any act or behavior of sexual harassment (as defined and enumerated in clause 2.4) will also amount to sexual harassment:
 - a. Implied or explicit promise of preferential treatment in her employment; or
 - b. Implied or explicit threat of detrimental treatment in her employment; or
 - c. Implied or explicit threat about her present or future employment status; or
 - d. Interference with her work or creating an intimidating or offensive or hostile work environment for her; or
 - e. Humiliating treatment is likely to affect her health or safety

3. Appropriate Authority

1. This would mean the following committees being consulted under this policy, who will work independently on all complaints referred to under this policy.
 - i. Steering Board (STB)
 - ii. Internal Complaints Committee (ICC)
 - iii. External Committee Member (ECM)
4. What should you do if you are sexually harassed?

1. If you feel that you have been the recipient of sexually harassing behavior, report it immediately to any of the following Internal Complaints Committee (ICC)
 - i. Ms. Bina Kotian (Presiding Officer) bina.kotian@infina.in
 - ii. Ms. Shilpa Bagul: shilpa.bagul@infina.in
 - iii. Ms. Kajal Shukla: (External Member): kajalshukla095@gmail.com
 - iv. Mr. Vaibhav Misra: vaibhav.misra@infina.in
 - v. Mr. Clifford Rodrigues: clifford.rodrigues@infina.in

It is preferable to make a complaint in writing, but you can accompany or follow up your written complaint with a verbal complaint.

Your identity will be protected, and you will not be retaliated against for making a complaint.

5. Procedure for filing a Complaint

- i. In the event of occurrence of circumstances under this policy, the AW can lodge a complaint to the Appropriate Authority in writing. At the time of filing the complaint, AW shall submit to the ICC six (6) copies of the complaint along with supporting documents and names and addresses of the witnesses.
 - ii. The complaint should be made by AW within a period of three months from the date of occurrence of incident and in case of a series of incidents, within a period of three months from the date of the last incident.
 - a. The ICC may, for the reasons to be recorded in writing, extend the time limit for making a complaint by three months, if it is satisfied that the circumstances were such which prevented the AW from filing a complaint within the said period.
6. What happens after a complaint is made?
Within 48 hours after a written complaint is made, a supervisor, or a designated person from Human Resources, will investigate the complaint. The investigator will speak with possible witnesses and with the person named in your complaint. Your anonymity will be protected to the extent possible. Depending on the complexity of the investigation, you should be contacted within a week about the status of your complaint and whether action is being taken.
7. Penalties
Sexual harassment will not be tolerated at Infina Finance Private Limited. If an investigation of any allegation of sexual harassment shows that harassing behavior has taken place, the harasser will be subject to disciplinary action, up to and including dismissal.
8. What is not sexual harassment?
Sexual harassment does not refer to occasional compliments of a socially acceptable nature. It refers to behavior that is not welcome, that is personally offensive, that debilitates morale, and that, therefore, interferes with work effectiveness.

Earlier Review Date	May 2024
Current Review Date	August 2025