



IKF Finance Limited

Policy on prevention of sexual harassment at Workplace	
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Proposed By	CEO & MD
Approving Authority	Board of Directors
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Revision History

31.03.2025 Committee member details updated

Date	Revision details
01.04.2024	Committee member details updated
30.01.2023	Committee member details updated
24.09.2022	Replaced Out going Legal Manager with National Legal Manager. Other contents remain same
20.10.2021	The senior Leadership team has approved reconstitution of the Committee replacing 4 members based at Corporate office to handle all the sexual harassment cases raised by women employees at work place
18.11.2020	Management has formed the ICC – POSH committee to handle the sexual harassment complaints from Women employees at work place

1. Introduction

IKF Finance (Company) treats every employee with dignity and respect that enables employees to work free from unwelcome, offensive and discriminatory behavior. The Company treats sexual harassment as misconduct under the service rules and aims to initiate action for such misconduct through implementation of the said Policy.

This Policy will be posted on the Company's website at www.ikffinance.com it is applicable for IKF Finance Limited.

2. Objective

- 1) To promote a safe and secure work environment for women including but not limited to working within the premises of the Company.
- 2) The policy aims at defining sexual harassment and providing a clearly stated codified redressal mechanism for any sexual harassment occurring at workplace. The main objective of the policy is to enable all those working with the Company to raise their concerns and make complaints without any fear and be heard in a fair and unbiased manner.

3. Regulatory Requirement

This policy is in accordance with the provisions of "The Sexual Harassment of Women at Workplace (Prevention, Prohibition, and Redressal) Act, 2013". The purpose of this POSH (Prevention of Sexual Harassment) policy is to provide for protection against sexual harassment at the workplace, for the prevention and redressal of complaints of sexual harassment and to enforce strong disciplinary action in the event of any such incident.

This policy provides guidelines for prompt redressal of complaints related to sexual harassment and in compliance with The Sexual Harassment of Women at Workplace (Prevention, Prohibition, and Redressal) Act, 2013 (the "**Act**").

4. Scope

IKF Finance Policy with regard to Prevention, Prohibition and Redressal of Sexual Harassment covers all employees across the Company. IKF encourages employees of all genders who believes they are sexually harassed to use the redressal mechanism as provided in this policy.

The company aims to provide a safe working environment for all people.

This policy is applicable to all the members of the company including employer and those who are employed on regular, temporary, on a daily wage basis, etc.

The policy also extends to those who are not employees of the company such as customers, clients, visitors, interns, contract workers, suppliers, etc.

This policy is restricted to the business locations of the company and any external location visited by the employees during the course of employment whether inside or outside of India.

5. Policy and its Effect

IKF Finance Policy on prevention of Sexual Harassment at Workplace includes sexual harassment by fellow employees, supervisors, managers as well as agents, contractors, customers, vendors, partners and, visitors including employees of outsourced entities. Sexual harassment is judged by the impact on the complainant and not the intent of the Respondent.

This Policy comes into force with immediate effect.

6. Definitions

- a) **“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.
- b) **“Company”** means IKF Finance company.
- c) **“Employee”** means a person employed at a workplace for any work on regular, temporary, ad hoc or daily wages basis, either directly or through an agent, including a contractor, 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;
- d) **“Internal Complaints Committee”** means a committee constituted by Company as per this Policy.
- e) **“Respondent”** means a person against whom the aggrieved person has made a complaint.
- f) **“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 pornography or 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; or

Following circumstances amongst other circumstances mentioned above may constitute sexual harassment if it occurs or is present in relation or connected with any act or behavior of sexual harassment which includes Implied or explicit promise of preferential treatment in their employment, implied or explicit threat of detrimental treatment in her employment, implied or explicit threat about their present or future employment status, interfering with their work or creating an intimidating or offensive or hostile work environment and humiliation treatment likely to affect their health or safety.

In addition to the instances mentioned hereinabove, any other acts or behavior, which outrages the modesty of a female employee, will be considered as sexual harassment.

- g) “Workplace” includes any department, division, undertaking, establishment, and 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.

7. Interpretation

Terms that have not been defined in this policy shall have the same meaning assigned to them in the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act 2013 as amended from time to time.

8. Internal Complaints Committee

The Internal Complaints Committee constituted by the Company (ICC) shall consist of:

- 1) A woman employee employed at a senior level amongst the employees shall act as Presiding officer of the committee.
- 2) Not less than 2 members from amongst employees preferably committed to the cause of women OR who have had experience in social work OR have legal knowledge
- 3) A representative from an NGO or associations committed to the cause of women or a person familiar with issues relating to Sexual Harassment.

Confidentiality: To ensure confidentiality, a dedicated e-mail posh.icc@ikffinapp.com has been created foremployees, for sending sexual harassment related complaints. This e-mail id can be accessed only by members of the ICC.

Annual report summarizing complaints on sexual harassment and measures taken on redressal shall be prepared by the Presiding Officer.

The said report as well as all documents regarding the complaints on sexual harassment shall be in the custody of the Presiding Officer and will be termed as ‘Strictly Confidential’.

The Internal Committee is responsible for inter alia:

- Receiving complaints of sexual harassment at work place

- Initiating and conducting enquiry as per established procedure
- Submitting reports of its findings
- Taking appropriate remedial measures to respond to any substantiated allegations of Sexual Harassment.
- Maintaining strict confidentiality as per the established procedure
- Discouraging and preventing employment-related sexual harassment.
- Any complaint that comes to the ICC will be dealt with appropriately, sensitively and confidentially in the most judicious and un-biased manner within certain defined time frame.

Where the Presiding Officer or any Member of the internal Committee:

- (a) contravenes the provisions of section 16; or
- (b) has been convicted for an offence or an inquiry into an offence under any law for that time being in force is pending against him/ her or
- (c) has been found guilty in any disciplinary proceedings or a disciplinary proceeding is pending against him; or
- (d) has so abused his position as to render his continuance in office prejudicial to the public interest,

such Presiding Officer or Member, as the case may be, shall be removed from the Committee and the vacancy so created or any casual vacancy shall be filled by fresh nomination in accordance with the provisions of section 4(5) of Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act 2013.

At least half the total members of each ICC shall be women. The Presiding Officer and every member of each ICC shall hold office for such period, not exceeding three years, from the date of their nomination as may be specified by the Company.

Internal Complaints Committee (ICC) at the Head Office

The current members of the ICC at the head office shall consist of:

S. No	Name	Designation	Committee Role	Email ID
1.	Ms. Kalyani Chunduri	AVP	Presiding Officer	kalyani.ch@ikffinance.com
2.	Mr. G Chakrapani	Chief Risk Officer	Committee Member	chakrapani.g@ikffinance.com
3.	Mr. Rohit Parashar	National Legal Manager	Committee Member	rohit.parashar@ikffinapp.com
4.	Ms. Kalpana Devi	HR Manager	Committee Member	Kalpana.r@ikffinapp.com
5.	Ms. Sujatha S	Deputy Company Secretary	Committee Member	sujatha@ikffinance.com
6.	Mr. Neeraj Kulkarni	Head Internal	Committee	

		Audit	Member	neeraj.kulkarni@ikffinapp.com
7.	Ms. Padmavati E*	Chartered Accountant	External Member	capadmavathi@gmail.com

*Ms. Padmavati E. - experience with issues relating to Sexual Harassment.

Internal Complaints Committee (ICC) at Regional Level

Appointment of Regional ICC members strengthen the POSH committee and bring vigilance through regional presence.

The POSH committee will work centrally from head office having regional members co-opted to work for the committee as active members in trainings, awareness sessions, meetings, inquiries and grievance redressal. They shall also be responsible as a member of POSH committee at regional level to ensure a safe environment for women.

The Regional Managers/ AVPs will be designated as regional ICC members and be trained by the POSH committee on their responsibilities as an ICC member in addition to the POSH trainings. Women Employees at senior level in regional offices will be joint members of these committee, wherever available.

9. Procedure to file complaint

Any aggrieved person may make a complaint, in writing or to the email id posh.icc@ikffinapp.com of sexual harassment at workplace to the committee giving details of the sexual harassment meted out to her within a period of 3 months from the date of incident. In case of series of incidents within a period of three months from the date of last incident. ICC may extend the time limit by a further period of three months if it is satisfied that circumstances were such which prevented the person from filing a complaint within the said period.

Where the aggrieved woman is unable to make a complaint on account of physical incapacity, a complaint may be filed by:

- Her relative or friend;
- Her co-worker; or
- An officer of the National Commission for Women or State Women's Commission; or
- Any person who has knowledge of incident, with the written consent of the aggrieved woman.

10. Complaint Redressal Mechanism

- 1) On receipt of complaint, the Internal Complaints Committee will decide the place and time for hearing the complaint and intimates the date, time and place of hearing to the Complainant and Respondent. The Internal Complaints Committee follows principle of Natural Justice while handling such complaints.
- 2) Respondent shall file reply within 10 working days of receipt of the complaint

- along with list of documents, names and addresses of witnesses.
- 3) Internal Complaints Committee shall have the right to terminate the enquiry or give expert decision on the complaint, if the Respondent or complainant remains absent for 3 consecutive hearings, without sufficient cause.
 - 4) The Internal Complaints Committee may before initiate an inquiry, and at the aggrieved person's request, attempt to settle the matter through conciliation.
 - 5) The Internal Complaints Committee may during such investigation may exercise the power of a civil court.

11.Action

- 1) The Internal Complaints Committee shall on completion of the enquiry provide a report of its findings within 10 days from the date of completion of the enquiry 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, it shall recommend to the Managing Director of the Company to take an action for sexual harassment as misconduct. Such action will be taken within 60 days of the receipt of report.

12.Awareness/Notification

- 1) All the Employees, Agents, Customers, Vendors, Partners and Visitors 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 IKF Finance during their initial Induction.
- 3) The Company shall comply with all other details as set out under Section 19 of the Act to ensure that all employees are provided with the safe working environment at the workplace.
- 4) Company shall display the notice showing the name of the Internal Complaints Committee members at its every establishment at a conspicuous place.
- 5) Assistance would be provided to the woman if she so chooses to file a complaint in relation to the offence under the Indian Penal Code or any other law for the time being in force;
- 6) Sexual harassment will be treated as a misconduct under the service rules and appropriate action will be initiated for such misconduct

13.HR Responsibilities

- a. Provide necessary facilities to the ICC for dealing with the complaint and conducting an inquiry.
- b. Assist in securing the attendance of respondent and witnesses before the ICC and make available such information to the ICC in context of the complaint.
- c. The HR department may seek appropriate expert advice and arrange for help

- and support for the recipient in the form of counselling and / or medical attention.
- d. Company at regular intervals will sensitize the employees with the provisions of the 2013 Act and orientation/capacity building programs for the members of the ICC.
 - e. Awareness to the employees on the constitution of ICC and its role in dealing with complaints of sexual harassment.

14.False Accusations

An employee who knowingly makes an allegation of sexual harassment to the committee shall be subject to disciplinary action, including termination of employment, in accordance with company rules, policies and procedures. Further, this policy may not be used as a defense by an employee against whom an adverse action has been taken by the company independent of any dis-closure of information and for legitimate reasons or cause under company rules and policies.

15.Miscellaneous

- 1) Company may make any alteration or amendment or rescind any of the clauses of this Policy as and when it finds it necessary to do so as long as it complies with the Act. Any such alterations or amendment or rescinding will be intimated to the employee.
- 2) Nothing contained in these rules shall operate in derogation of any law for the time being in force or to the prejudice of any right of any employee under any other Rules or Law.
- 3) The Internal Complaints Committee shall prepare an annual report shall submit the same to the Company to include in its Annual report detailing number of complaints of sexual harassment received during the year, disposed off and pending cases.

16.External Reporting

As per Prevention of Sexual Harassment Act, 2013, there are 2 reports to be submitted by the employer:

- 1) It is the duty of the ICC to submit an annual report, which includes the number of cases filed/disposed of every calendar year to the employer and district office.
- 2) The employer has a statutory obligation to ensure this report is included in the annual report of the organization filed to the Registrar of companies.

The details required to be included in the annual reporting are as follows:

- 1) No. of complaints of sexual harassment received in the year
- 2) No. of complaints disposed off during the year
- 3) No. of complaints pending for more than ninety days
- 4) No. of workshop or awareness programs against sexual harassment carried out
- 5) No. of actions taken by employer of District Officer

16.1 Reporting to Board

All complaints received under this POSH Policy, along with their status and resolution details, shall be periodically reported to the the Board of Directors on a quarterly basis. The report shall include all cases received during the quarter, including closed, pending, and resolved cases, and may also include a “NIL” report in cases where no complaints have been received during the reporting period.

17.Conclusion

Complaints relating to Sexual Harassment shall be handled and investigations will be conducted under the principles of natural justice, basis of fundamental fairness, in an impartial and confidential manner so as to protect the identity of all viz., the person bringing the charge, potential witnesses, and the person accused of improper behavior. Also, all efforts shall be taken to ensure objectivity and thoroughness throughout the process of investigation.

The identity and address of the aggrieved person, respondent and witnesses must not be published or disclosed to the public or media.

The decision of Company shall be final and binding on all. However, the same is without prejudice to any recourse that Company or the individual concerned may have against the respondent and it shall not limit or restrict the rights of the Complainant and/or Company to pursue, nor shall they be precluded from pursuing, such further and other legal actions as may be available.
