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# POLICY FOR PREVENTION OF SEXUAL HARASSMENT (POSH)

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# **PREVENTION OF SEXUAL HARASSMENT AT WORKPLACE (POSH) POLICY**

## **1. PURPOSE:**

To create and maintain safe work environment, free from sexual harassment & discrimination for all its employees. As per the guidelines of "The Sexual harassment of women at workplace (prevention, prohibition & redressal) Act, 2013.

## **2. SCOPE:**

This policy and procedure applies to all employees of GILADA Finance and Investments Limited (GFIL) including permanent and employees on contract at its workplace or at Client/ Dealer/ Contractor Site. The Company will not tolerate sexual harassment, if engaged in by clients or by financial institutes or any other business associates or within the organization by the employees of the company, if any.

## **3. POLICY:**

Sexual harassment may be one or a series of incidents involving unsolicited and unwelcome sexual advances, requests for sexual favors, or any other verbal or physical conduct of sexual nature.

Sexual Harassment at the workplace includes:

- Unwelcome sexual advances (verbal, written or physical),
- Demand or request for sexual favors,
- Any other type of sexually-oriented conduct,
- Verbal abuse or 'joking' that is sex-oriented,
- Any conduct that has the purpose or the effect of interfering with an individual's work performance or creating an intimidating, hostile or offensive work environment and/or submission to such conduct is either an explicit or implicit term or condition of employment and /or submission or rejection of the conduct is used as a basis for making employment decisions.

## **4. GRIEVANCE MECHANISM: PROCEDURE TO REGISTER COMPLAINTS:**

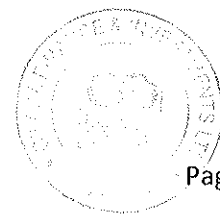
A complaint shall be submitted in writing to [pallavi.g@giladagroup.com](mailto:pallavi.g@giladagroup.com) or to any member of the Internal Committee mentioned herein within 3 months of occurrence of an act of Sexual Harassment. If the respondent is direct supervisor of the complainant, or person influencing the career growth of the complainant, the reporting structure will be changed till the time the enquiry is completed.

## **5. INTERNAL COMPLAINT COMMITTEE:**

The Company has constituted a Complaints Committee for redressal of sexual harassment complaint (made by the victim) and for ensuring time bound treatment of such complaints.

Initially, and till further notice, the Complaints Committee will comprise of the following four members (4) out of which at least two (2) members will be women:

- Mrs. Sangeeta Gilada –Chief Executive Officer (Chairperson)
- Mrs. Pallavi Gilada – Chief Financial Officer (Member)



- Mr. M Bhadrish – HR Manager (Member)
- 1 Lady Member (From NGO or Psychologist or lawyer)

The Complaints Committee is responsible for:

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

## 6. PROCEDURES FOR RESOLUTION, SETTLEMENT OR PROSECUTION OF ACTS OF SEXUAL HARASSMENT:

The Company is committed to provide a supportive environment to resolve concerns of sexual harassment as under:

### ➤ Informal Resolution Options

When an incident of sexual harassment occurs, the victim of such conduct can communicate her disapproval and objections immediately to the harasser and request the harasser to behave decently.

If the harassment does not stop or if victim is not comfortable with addressing the harasser directly, she can bring her concern to the attention of the Complaints Committee for redressal of her grievances. The Complaints Committee will thereafter provide advice or extend support as requested and will undertake prompt investigation to resolve the matter.

### ➤ Complaints:

Any employee with a harassment concern, who is not comfortable with the informal resolution options may make a formal complaint to the Internal Complaints Committee constituted by the Management. The complaint shall have to be in writing, either as a letter to be addressed at POSH Internal Complaint Committee, Gilada Finance and Investments Limited, 105, R R Takt, 37 Boopasandra Main Road, Bangalore, Karnataka-560094, or as an email at [pallavi.g@giladagroup.com](mailto:pallavi.g@giladagroup.com) within 3 days from the date of occurrence of the alleged incident. The employee is required to disclose her name, department and branch she is working in, to enable the Chairperson to contact her and take the matter forward.

- I. The Chairperson of the Complaints Committee will proceed to determine whether the allegations (assuming them to be true only for the purpose of this determination) made in the complaint fall under the purview of Sexual Harassment, preferably within 3 days from receipt of the complaint. In the event, the allegation does not fall under the purview of Sexual Harassment or the allegation does not mean an offence of Sexual Harassment, s/he will record this finding with reasons and communicate the same to the complainant.
- II. If the Chairperson of the Complaints Committee determines that the allegations constitute an act of sexual harassment, s/he will proceed to investigate the allegation with the assistance of the Complaints Committee.



- III. Where such conduct on the part of the accused amounts to a specific offence under the law, the Company shall initiate appropriate action in accordance with law by making a complaint with the appropriate authority.
- IV. The Complaints Committee shall conduct such investigations in a timely manner and shall submit a written report containing the findings and recommendations to the Chairperson of the committee as soon as practically possible and in any case, not later than 10 days from the date of receipt of the complaint. The Chairperson will ensure corrective action on the recommendations of the Complaints Committee and keep the complainant informed of the same.
- Corrective action may include any of the following:
- a. Formal apology
  - b. Counseling
  - c. Written warning is given and a copy of it maintained in the employee's file.
  - d. Change of work assignment / transfer for either the perpetrator or the victim.
  - e. Suspension or termination of services of the employee found guilty of the offence
- V. In case the complaint is found to be false, the complainant shall, if deemed fit, be liable for appropriate disciplinary action by the Management.

#### **7. 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 accused 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.

#### **8. ACCESS TO REPORTS AND DOCUMENTS:**

All records of complaints, including contents of meetings, results of investigations and other relevant material will be kept confidential by the Company except where disclosure is required under disciplinary or other remedial processes.

#### **9. PROTECTION TO COMPLAINANT / VICTIM:**

The Company is committed to ensuring that no employee who brings forward a harassment concern is subject to any form of reprisal. Any reprisal will be subject to disciplinary action.

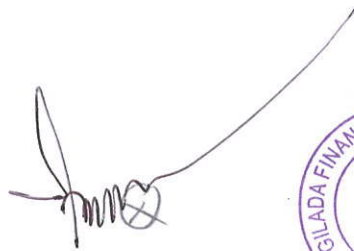
The Company will ensure that victim or witnesses are not victimized or discriminated against while dealing with complaints of sexual harassment.

However, anyone who abuses the procedure (for example, by maliciously putting an allegation knowing it to be untrue) will be subject to disciplinary action.



**10. 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.

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