

IFCI FACTORS LIMITED

POLICY ON PREVENTION OF SEXUAL HARASSMENT AT WORKPLACE

I. COMMITMENT

IFCI Factors Limited ('The Company') is committed to providing work environment that ensures every employee is treated with dignity and respect and afforded equitable treatment. The Company is also committed to promoting a work environment that is conducive to the professional growth of its employees and encourages equality of opportunity. The Company will not tolerate any form of sexual harassment and is committed to take all necessary steps to ensure that its employees are not subjected to any form of harassment.

II. SCOPE

This policy applies to all categories of employees of the Company, including permanent management and workmen, temporaries, trainees and employees on contract at their workplace or at client sites.

The workplace includes:

1. All offices or other premises where the Company's business is conducted.
2. All company-related activities performed at any other site away from the Company's premises.
3. Any social, business or other functions where the conduct or comments may have an adverse impact on the workplace or workplace relations.

III. DEFINITION OF SEXUAL HARASSMENT

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 may amount to sexual harassment :

- i) Implicit or explicit promise of preferential treatment in his/her employment; or
- ii) Implied or explicit threat of detrimental treatment in his/her employment; or
- iii) Implied or explicit threat about his/her present or future employment status;
- iv) Interference with his/her work or creating an intimidating or offensive or hostile work environment for him/ her; or
- v) Humiliating treatment likely to affect his/her health or safety

Sexual harassment includes such unwelcome sexually determined behavior, whether directly or otherwise as :

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

IV. RESPONSIBILITIES REGARDING SEXUAL HARASSMENT

All employees of the Company have a personal responsibility to ensure that their behavior is not contrary to this policy. All employees are encouraged to reinforce the maintenance of a work environment free from sexual harassment. Without prejudice to the generality of this obligation they should take the following steps :

- i) Express prohibition of sexual harassment as defined above at work place should be notified, published and circulated in appropriate ways; and
- ii) The rules/regulations of Government relating to conduct and discipline should include rules / regulations prohibiting sexual harassment and provide for appropriate penalties in such rules against the offender

V. COMPLAINT MECHANISM

An appropriate complaint mechanism should be created to redress the complaint made by the victim. Such complaint mechanism should ensure time bound treatment of complaints. The disclosure of compliance of this Policy and complaints received/resolved during the year shall be disclosed in the Annual Report.

VI. COMPLAINTS COMMITTEE

The Complaint Committee should be headed by a woman and not less than half of its members should be women. Further, to prevent the possibility of any undue pressure of influence from senior levels, such Complaints Committee should involve a third party, either NGO or other body who is familiar with the issue of sexual harassment.

The Competent Authority / Managing Director shall constitute a Complaint Committee comprising of one Presiding Officer and at least three members out of which one should be external members preferably with legal knowledge / social work background.

The Complaints Committee is responsible for :

- i) Investigating every formal written complaint of sexual harassment;
- ii) Taking appropriate remedial measures to respond to any substantiated allegations of sexual harassment ; and
- iii) Discouraging and preventing employment-related sexual harassment

VII. PROCEDURES FOR RESOLUTION, SETTLEMENT OR PROSECUTION OF ACTS OF SEXUAL HARASSMENT

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

A. Informal Resolution Options

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

If the harassment does not stop or if the victim is not comfortable with addressing the harasser directly, the victim can bring his/her concern to the attention of the Complaints Committee for redressal of his/her grievances. If the complaint is not in writing all reasonable assistance shall be provided by the Complaints Committee to the victim to make the complaint in writing, advice or extend support as requested and will undertake prompt investigation to resolve the matter.

B. Complaints

1. An employee with a harassment concern, who is not comfortable with the informal resolution options or has exhausted such options, may make a formal complaint to the Presiding Officer of the Complaints Committee constituted by the Management. The complaint shall have to be in writing and can be in form of a letter, preferably within 15 days from the date of occurrence of the alleged incident, sent in a sealed envelope. Alternately, the employee can send complaint through an email. The employee is required to his/her name, department, division and location he/she working in, to enable the Presiding Officer to contact him/her and take the matter forward.
2. The Presiding Officer 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 30 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 constitute an offence of Sexual Harassment, the Presiding Officer will record this finding with reasons and communicate the same to the complainant.

3. If the Presiding Officer of the Complaints Committee determines that the

allegations constitute an act of sexual harassment, he/ she will proceed to investigate the allegation with the assistance of the Complaints Committee.

4. 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.
5. The Complaints Committee shall conduct such investigations in a timely manner and shall submit a written report containing the findings and recommendations to the Managing Director as soon as practically possible and in any case, not later than 90 days from the date of receipt of the complaint. The Managing Director 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. Counselling
 - c. Written warning to the perpetrator 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
6. In case the complaint is found to be false, the Complainant shall, if deemed fit, be liable for appropriate disciplinary action by the Management.

VIII. CONFIDENTIALITY:

It is difficult for the victim to come forward with a complaint of sexual harassment. To protect the interest of the victim full confidentiality will be maintained throughout the investigatory process to the extent practicable and appropriate under the circumstances.

IX. 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.

X. 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 the 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.

XI. CONCLUSION:

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