



Anson Fincorp Private Limited

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ANTI - SEXUAL HARASSMENT POLICY

<u>Version Control</u>		
Version Number	Description	Date
Version - 1	Approval	30.01.2014
Version -2	Review	24.04.2024

Effective Date	25.04.2024
Prepared by	Secretarial Department
Custodian	Company Secretary
Reviewed by	Board of Directors
Approved by	Board of Directors

1. Introduction

Anson Fincorp Private Limited ('the Company') is a Non-Banking Financial Company ('NBFC') having valid Certificate of Registration with Reserve Bank of India ('RBI') vide registration no. B.16.00196 dated June 29, 2007 as a Base Layer NBFC. The Company specializes in providing financial services, including lending solutions compliant with RBI's Scale Based Regulation (SBR).

The Company is committed to providing a safe, secure, and dignified working environment for all its employees and associates and has adopted this Policy in compliance with the provisions of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013.

2. Objective

Anson Fincorp Private Limited (hereinafter referred to as "Company") is committed to provide a work environment that ensures every woman employee is treated with dignity and respect and afforded equitable treatment. The company is also committed to promote a work environment that is conducive to the professional growth of its women 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 women employees are not subjected to any form of harassment. This Policy aims to:

- Prevent and prohibit sexual harassment of women at the workplace.
- Provide effective redressal mechanisms for complaints.
- Ensure compliance with the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013.

3. Commitment

The Company is committed to:

- (i) Providing a workplace where every woman employee is treated with dignity, respect, and equity.
- (ii) Promoting professional growth and equal opportunities for women.
- (iii) Maintaining a zero-tolerance environment for sexual harassment.

Sexual harassment violates the **Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 ("POSH Act")**, Company policy, and employment terms. Conviction of any such act will result in strict disciplinary action, up to termination.

4. Scope

This Policy applies to:

- (i) All women employees, including permanent, temporary, trainees, contract staff, and those on deputation.
- (ii) Harassment by or against clients, vendors, or business associates at Company workplaces.

Workplace includes:

- (i) All Company offices, branches, and premises.
- (ii) Off-site work-related activities, travel, or events.
- (iii) Virtual/ digital platforms used for Company business.
- (iv) Any location/location where conduct impacts workplace relations.

5. Definition

5.1 Aggrieved Woman: In relation to a workplace, a woman (employed or not) alleging sexual harassment by the Respondent. (POSH Act, Section 2(a))

5.2 Company: Anson Fincorp Private Limited.

5.3 Employee: Any person employed at a workplace (regular, temporary, contract, trainee, etc.), directly or through an agent, for remuneration or voluntarily. Includes co-workers, probationers, and apprentices.

5.4 Internal Complaints Committee (ICC): Committee constituted under this Policy and POSH Act.

5.5 Respondent: Person against whom the complaint is filed.

5.6 Sexual Harassment: Sexual harassment means any unwelcome acts or behaviour (whether directly or by implication) of a sexual nature, including but not limited to the following, as defined under Section 2(n) of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013:

1. Physical contact/advances.
2. Demand/request for sexual favors.
3. Sexually colored remarks.
4. Showing pornography/offensive material (pictures, cartoons, etc.).
5. Any other unwelcome physical, verbal, or non-verbal sexual conduct.

Sexual harassment also includes unwelcome conduct through electronic or digital means such as emails, messages, video calls, or social media platforms used for official purposes.

Hostile Environment Factors (if connected to above):

- Promise/threat of preferential/detrimental treatment in employment.
- Threats to employment status.
- Interference with work or creating intimidating/offensive/hostile environment.
- Humiliating treatment affecting health/safety.

5.7 Workplace:

- i. Any Company department, office, branch, or unit.
- ii. Places visited during employment (including Company-provided transport).
- iii. Off-site events, travel, or digital platforms related to work.

6. Internal Complaints Committee

The Company has constituted an Internal Complaints Committee (“ICC”) for the redressal of complaints relating to sexual harassment of women at the workplace and for ensuring time-bound and effective disposal of such complaints.

In accordance with the provisions of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, the Internal Complaints Committee shall comprise of the following members:

- a. **Presiding Officer** – A woman employee employed at a senior level at the workplace.
- b. **Two Members** – From amongst the employees, preferably having experience in social work or having legal knowledge or familiarity with matters relating to sexual harassment.
- c. **One External Member** – From amongst non-governmental organizations or associations committed to the cause of women, or a person familiar with issues relating to sexual harassment.

The names and details of the members of the Internal Complaints Committee shall be provided in **Annexure A** to this Policy and shall be notified by the Company from time to time.

At least fifty percent (50%) of the members of the ICC shall be women. The Presiding Officer and every member of the ICC shall hold office for a period not exceeding three (3) years from the date of their nomination, as may be decided by the Company.

7. ICC Responsibilities:

- (i) Receive and investigate complaints of sexual harassment.

- (ii) Conduct fair, impartial inquiries following natural justice principles.
- (iii) Submit inquiry report with recommendations within 90 days.
- (iv) Recommend interim relief (transfer, leave, suspension) during inquiry.
- (v) Monitor policy implementation and awareness programs.
- (vi) Maintain strict confidentiality of proceedings.
- (vii) Shall prepare and submit an annual report in accordance with Section 21 of the POSH Act, and the Company shall comply with applicable disclosure and filing requirements

8. Who Can File a Complaint?

A complaint of sexual harassment may be filed by the **aggrieved woman**.

Where the aggrieved woman is unable to make a complaint due to the reasons stated below, the complaint may be filed by the following persons, in accordance with the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Rules, 2013:

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

- i. a relative or friend; or
- ii. a co-worker; or
- iii. an officer of the National Commission for Women or State Women's Commission; or
- iv. any person who has knowledge of the incident, with the written consent of the aggrieved woman.

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

- i. a relative or friend; or
- ii. a special educator; or
- iii. a qualified psychiatrist or psychologist; or
- iv. the guardian or authority under whose care she is receiving treatment or care; or
- v. any person who has knowledge of the incident, jointly with any of the persons mentioned above.

c. Where the aggrieved woman is unable to make a complaint for any other reason, a complaint may be filed by any person who has knowledge of the incident, with the written consent of the aggrieved woman.

d. Where the aggrieved woman has died, a complaint may be filed by her legal heir or any person prescribed under applicable law.

9. Mode of Complaint

A complaint of sexual harassment shall be made in writing to the Internal Complaints Committee and may be submitted by hand, by post, by email, or through any other electronic mode of communication.

Where a complaint is received through electronic means, such complaint shall be treated as a valid written complaint. If the complaint is made orally or requires clarification, the ICC shall provide all reasonable assistance to the aggrieved woman to reduce the complaint into writing before initiating the inquiry.

10. Complaint Redressal Mechanism

a) Any aggrieved woman may make, in writing, a complaint of sexual harassment at the workplace to the Internal Complaints Committee within a period of three (3) months from the date of the incident and, in case of a series of incidents, within a period of three (3) months from the date of the last incident.

The Internal Complaints Committee may extend the time limit by a further period of three (3) months, if it is satisfied that the circumstances prevented the aggrieved woman from filing the complaint within the said period.

Complaint can be made by email to: posh@anson.co.in or can be directly made to the HR department.

b) Upon receipt of the complaint along with supporting documents, if any, the same shall be forwarded to the Presiding Officer and intimated to the other members of the Committee at the earliest.

The Committee shall, within a reasonable time, convene a meeting to determine whether it has jurisdiction to deal with the complaint and shall issue notice to the respondent within seven (7) working days of receipt of the complaint, seeking a written response.

c) The Internal Complaints Committee shall render all reasonable assistance to the aggrieved woman for making the complaint in writing, where she is unable to do so.

d) The Committee shall provide assistance to the aggrieved woman, if she so chooses, to file a complaint with the appropriate authority in relation to an offence under the Indian Penal Code or any other applicable law.

e) A period of ten (10) days from the date of receipt of the notice shall be given to the respondent to submit a written reply along with the list of witnesses and supporting documents.

f) The Presiding Officer shall convene the first hearing of the enquiry. The respondent, the aggrieved woman, and the witnesses shall be intimated at least seven (7) working days in advance in writing of the date, time, and venue of the enquiry proceedings. The subsequent proceedings may be conducted on a day-to-day basis, as decided by the Committee.

The Internal Complaints Committee shall follow the principles of natural justice while handling such complaints.

g) As an interim measure, upon written request by the aggrieved woman, the Committee may, at its discretion, recommend to the Company:

- i. transfer of the aggrieved woman or the respondent to another workplace;
- ii. grant leave to the aggrieved woman of up to three (3) months, in addition to her regular leave entitlement;
- iii. restraining the respondent from exercising any administrative authority or supervision over the aggrieved woman;
- iv. granting such other relief to the aggrieved woman as may be deemed appropriate.

h) Inquiry Process:

- i) The Internal Complaints Committee shall conduct a detailed inquiry into the complaint and shall have the power to summon the respondent or any witnesses, as necessary.
 - ii) The Internal Complaints Committee may terminate the enquiry or give an ex-parte decision, if the complainant or the respondent remains absent for three (3) consecutive hearings, without sufficient cause, after recording reasons in writing.
 - iii) The Internal Complaints Committee shall complete the inquiry within a period of ninety (90) days. All proceedings shall be recorded in writing, and statements of witnesses shall be endorsed by the persons concerned and the Committee members present.
- i)** The Internal Complaints Committee may, before initiating an inquiry and at the request of the aggrieved woman, take steps to settle the matter through conciliation, provided that:
- i. no monetary settlement shall be made as a basis of conciliation;
 - ii. the settlement so arrived at shall be recorded and forwarded to the Human Resources Department for implementation;
 - iii. copies of the settlement shall be provided to the aggrieved woman and the respondent.

Where a settlement has been arrived at, no further inquiry shall be conducted. If conciliation is not feasible, the Committee shall proceed with inquiry.

- j) The Committee shall conduct the inquiry in accordance with the applicable service rules of the Company, treating sexual harassment as misconduct.
- k) The Committee shall provide a reasonable opportunity to both the aggrieved woman and the respondent to present and defend their respective cases.
- l) The Committee may, at any stage of the inquiry, preclude direct face-to-face examination between the aggrieved woman and the respondent or witnesses, where necessary to protect the safety, health, or dignity of the aggrieved woman or witnesses.
- m) The Committee may call any person to appear as a witness if it is of the opinion that it shall be in the interest of justice. The aggrieved woman/respondent has to submit the written reply before the committee within the specified time given.
- n) The aggrieved woman and the respondent shall be responsible for presenting their witnesses before the Committee. However, if the Committee is convinced that the absence of either of the parties to the disputes is on valid grounds, the Committee shall adjourn that particular meeting of the Committee for a period not exceeding five days. The meeting so adjourned shall be conducted thereafter, even if the person concerned fails to appear for the said adjourned meeting without prior intimation/valid ground.
- o) The aggrieved woman and the respondent shall have the right of cross-examination of all witnesses. However, such cross-examination shall be conducted in the form of written questions and responses via the Committee only. The respondent shall have no right to directly cross-examine the aggrieved woman or her witnesses. The respondent/aggrieved woman may submit to the Committee, a written list of questions that he/she desires to pose to the aggrieved woman/witness. The Committee (ICC) shall retain the right to disallow any questions that it has reason to believe to be irrelevant, mischievous, slanderous, derogatory or gender-insensitive

11. Manner of Taking Action Against the Respondent.

(i) Where the Internal Complaints Committee arrives at the conclusion that the allegation against the respondent has been proved, it shall recommend to the Company to take action, which may include the following:

- a. Written apology;
- b. Warning;
- c. Reprimand or censure;
- d. Withholding of promotion;
- e. Withholding of pay rise or increments;
- f. Termination of the respondent from service;

- g. Undergoing counselling sessions or carrying out community service;
- h. Any other punishment as per the service rules applicable to the respondent.

Where the allegation against the respondent has not been proved, the Committee may recommend that no action needs to be taken in the matter.

(ii) The Company shall act upon the recommendations of the ICC within sixty (60) days of receipt of the inquiry report

12. Awareness

- a. This Policy shall be made available to all employees and shall be accessible at all times. Any clarification relating to this Policy shall be addressed by the Human Resources Department.
- b. A briefing on the features of this Policy shall be provided to all existing employees upon formulation of the Policy and to all new employees during their induction process.
- c. The Company shall comply with all other obligations as prescribed under Section 19 of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, to ensure a safe working environment for all employees.

13. Punishment for False or Malicious Complaint and False Evidence

Where the Internal Complaints Committee arrives at the conclusion that the allegation against the respondent is malicious, or that the aggrieved woman or any other person making the complaint has made the complaint knowing it to be false, or has produced any forged or misleading document, the Committee may recommend the Company to take action against such person in accordance with the provisions of the service rules applicable to her or him.

Provided that mere inability to substantiate a complaint or provide adequate proof shall not attract action under this clause.

14. Confidentiality

The Company recognizes that it may be difficult for an aggrieved woman to come forward with a complaint of sexual harassment and therefore places utmost importance on maintaining confidentiality.

In accordance with the provisions of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, the identity of the aggrieved woman, the respondent and the witnesses, the contents of the complaint, the inquiry proceedings, the recommendations of the Internal Complaints Committee and the action taken by the Company shall not be published, communicated or made known to the public, press or media in any manner.

Disclosure of information may be made only where required under law, without revealing the name, address, identity or any other particulars calculated to lead to the identification of the aggrieved woman and other persons concerned.

15. Miscellaneous

- a. The Company may, with the approval of the competent authority, alter, amend or rescind any of the clauses of this Policy from time to time, as may be deemed necessary, provided such changes are in compliance with the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013. Any such alteration, amendment or rescission shall be duly communicated to the employees.
- b. Nothing contained in this Policy 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 applicable law, rules or regulations.
- c. The Company strictly prohibits retaliation against the aggrieved woman, witnesses, or any person assisting in the inquiry. Any act of retaliation shall be treated as misconduct and attract disciplinary action.

16. Conclusion

Complaints relating to Sexual Harassment shall be handled and investigations shall be conducted in accordance with the principles of natural justice and based on fundamental fairness, in an impartial and confidential manner, so as to protect the identity of all concerned, including the complainant, potential witnesses and the respondent.

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

17. Policy Implementation & Review

The Policy will be implemented and reviewed by the Board of the Company. The Board reserves the right to amend, modify, and rescind/reinstate the entire policy or any part of it at any given time.

ANNEXURE – A

COMPOSITION OF INTERNAL COMPLAINTS COMMITTEE

Sr. No.	Name	Designation	Membership
1.	Ms. Animol P V	Senior Employee	Presiding Officer
2.	Mr. Jobin James	Employee	Internal Member
3.	Ms. Honeymol Jose	Employee	Internal Member
4.	Adv. Nimisha Rajendran	External Professional	External Member