

Grameen Development & Finance Private Limited- Policy against sexual harassment

Grameen Development & Finance Private Limited ("the company") is committed to provide a work environment that ensures every employee without discriminating on the ground of gender and will be treated with dignity and respect and afforded equitable treatment. The Company is also committed to promote a work environment that is encouraging 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 sexual harassment.

Scope of the policy:

This Policy extends to all employees of the Company and is deemed to be incorporated in the service conditions of all employees and comes into effect immediately.

Sexual harassment would mean and include any of the following:

- i) Unwelcome sexual advances, requests or demand for sexual favours, either explicitly or implicitly, in return for employment, promotion, examination or evaluation of a person towards any company activity;
- ii) Unwelcome sexual advances involving verbal, non-verbal, or physical conduct such as sexually coloured remarks, jokes, letters, phone calls, e- mail, gestures, sms, mms showing of pornography, lurid stares, physical contact or molestation, stalking, sounds, display of pictures, signs, verbal or non- verbal communication which offends the individuals sensibilities and affect her/his performance;
- iii) Eve teasing, innuendos and taunts, physical confinement against one's will and likely to intrude upon one's privacy;
- iv) Act or conduct by a person in authority which creates the environment at workplace hostile or intimidating to a person belonging to the other sex;
- v) Conduct of such an act at work place or outside in relation to an Employee or vice versa during the course of employment; and
- vi) Any unwelcome gesture by an employee having sexual overtones.

If an employee is being harassed:

(a) He/She may tell the accused that his / her behaviour is unwelcome and ask him/her to stop.

(b) Keep a record of incidents (dates, times, locations, possible witness, what happened, your response). It is not mandatory to have a record of events to file a complaint, but a record can strengthen your case and help you remember the details over time, in case the complaint is not filed immediately.

(c) May File a complaint as soon as possible. If, after asking the accused to stop his / her behaviour, the harassment continues, report the abuse to the Complaint Redressal Committee formed for this purpose.

Complaint redressal committee:

A Committee will be constituted by the Management to consider and redress complaints of Sexual Harassment. The Chairman and Members of the Committee will be as follows:

1. Dr Mahendra Kalita, Chairperson
2. Sarat Ch. Das, Member
3. Mira Das, Member

4. Rumi Thakuria, Member
5. Kashmiri Rabha, Convener

A quorum of 4 members is required to be present for the proceedings to take place. The quorum shall include the Chairperson, at least four members, two of whom shall be female members.

Redressal process:

- i) Any employee who feels and is being sexually harassed directly or indirectly may submit a complaint of the alleged incident to any member of the Committee in writing with his/her signature within 10 days of occurrence of incident.
- ii) If a complainant approaches the committee after the completion the stipulated period of 10 days. The committee on ground of reason behind the delay will accept or reject the complaint.
- iii) The Committee will maintain a register to endorse the complaint received by it and keep the contents confidential, if it is so desired, except to use the same for discreet investigation.
- iv) The Committee will hold a meeting with the Complainant within five days of the receipt of the complaint, but no later than a week in any case.
- v) At the first meeting, the Committee members shall hear the Complainant and record her/his allegations. The Complainant can also submit any corroborative material with a documentary proof, oral or written material etc., to substantiate his / her complaint. If the Complainant does not wish to depose personally due to embarrassment of narration of event, a lady officer for lady employees involved and a male officer for male employees involved shall meet and record the statement.
- vi) Thereafter, the person against whom complaint is made may be called for a deposition before the Committee and an opportunity will be given to him/ her to give an explanation, where after, an "Enquiry" shall be conducted and concluded.
- vii) In the event, the complaint does not fall under the purview of Sexual Harassment or the complaint does not mean an offence of Sexual Harassment, the same would be dropped after recording the reasons thereof.
- viii) In case the complaint is found to be false, the Complainant shall, if deemed fit, be liable for appropriate disciplinary action by the Management.

Enquiry process:

- a) The Committee shall immediately proceed with the Enquiry and communicate the same to the Complainant and person against whom complaint is made.
- b) The Committee shall prepare and hand over the Statement of Allegation to the person against whom complaint is made and give him / her opportunity to submit a written explanation if she / he so desires within 7 days of receipt of the same.
- c) The Complainant shall be provided with a copy of the written explanation submitted by the person against whom complaint is made.
- d) If the Complainant or the person against whom complaint is made desires any witnesses to be called, they shall communicate in writing to the Committee the names of witnesses whom they propose to call.

- e) If the Complainant desires to tender any documents by way of evidence before the Committee, she / he shall supply original copies of such documents. Similarly, if the person against whom complaint is made desires to tender any documents in evidence before the Committee he / she shall supply original copies of such documents. Both shall affix his / her signature on the respective documents to certify these to be original copies.
- f) The Committee shall call upon all witnesses mentioned by both the Parties.
- g) The Committee shall provide every reasonable opportunity to the Complainant and to the person against whom complaint is made, for putting forward and defending their respective case.
- h) The Committee shall complete the "Enquiry" within reasonable period but not beyond one & half months and communicate its findings and its recommendations for action to the HR Deptt. The report of the committee shall be treated as an enquiry report on the basis of which an erring employee can be awarded appropriate punishment straightaway.
- i) The HR Department will direct appropriate action in accordance with the recommendation proposed by the Committee.
- j) The Committee shall be governed by such rules as may be framed by the Supreme Court orders or any other legislation enacted later on.

Other points to be considered:

1. Where any misconduct is found by the Committee, appropriate disciplinary action shall be taken against the accused. Disciplinary action may include transfer, withholding promotion, suspension or even dismissal. This action shall be in addition to any legal recourse sought by the complainant.
2. The management shall provide all necessary assistance for the purpose of ensuring full, effective and speedy implementation of this policy.
3. Where sexual harassment occurs as a result of an act or omission by any third party or outsider, the company shall take all steps necessary and reasonable to assist the affected person in terms of support and preventive action.
4. The Committee shall analyze and put up report on all complaints of this nature at the end of the every quarter for submission to Governing Board.
5. All information received shall be kept confidential. Any person (including witnesses) who breaches confidentiality shall be subject to disciplinary action.
6. In case the Committee found the degree of offence coverable under the Indian Penal Code, then this fact shall be mentioned in its report and appropriate action shall be initiated by the Management, for making a Police Complaint.