



BAID FINSERV LIMITED

Policy for Prevention, Prohibition and Redressal of Sexual Harassment of women at workplace

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Company Circulation

Version Control

Document Version	Description of Change/ Annual Review	Date	Prepared / Changed by
1.0	Annual Review	04th May 2022	Human Resource Department
2.0	Re-Constitute the Internal Complaint Committee	09th February 2024	Human Resource Department
3.0	Re-Constitute the Internal Complaint Committee	13th August, 2024	Human Resource Department
4.0	Re-Constitute the Internal Complaint Committee	14th November, 2024	Human Resource Department

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The company believes that all its employees have the human right to be treated with dignity. Sexual Harassment at the work place or in the course of official duties, if involving employees of the Company, shall be considered a grave offence, and is therefore punishable under the applicable laws.

On April 23, 2013, the Government of India has made effective a law called 'The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act 2013' on prevention of sexual harassment against female employees at the workplace.

Any person making unwelcome physical contact and explicit sexual overtures, demanding or requesting sexual favours, making sexually coloured remarks or showing pornography against the will of a woman shall be guilty of the offence of Sexual Harassment and Section 354A of the Indian Penal Code 1860 prescribes punishment for this offence to imprisonment.

The objective of this policy is to eliminate sexual harassment in the workplace:

- To provide a working environment that is free from harassment of any kind and in particular, a work environment that does not tolerate 'sexual harassment'.
- To provide appropriate mechanism to deal with the problem and prevent occurrence of sexual harassment where all people respect one another's dignity, privacy and right to equality in the workplace.
- To ensure that sexual harassment is addressed in a sensitive, efficient, effective and confidential manner.
- To ensure that victims of sexual harassment are afforded alternative remedies, when they feel unable to confront the perpetrators or turn to colleagues for support.

SCOPE OF THIS POLICY

This policy applies to all individuals who are employed in a permanent, contractual, temporary, or fellowship or any other capacity at any of Baid Finserv Limited. ('BaidFin') office location with any of the group companies. This policy document is also being forwarded to all the BaidFin offices with the clear advice to establish a similar approach in dealing with this issue.

This policy pertains to sexual harassment in the workplace, or during work related travel and meetings. However, as a representative of BaidFin, all staff is expected to act responsibly and respectfully both within the office and beyond office hours.

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DEFINATION OF ISSUE

- I. A broad definition of sexual harassment consists of any physical or verbal behavior and any form of communication that has unnecessary, improper or unwelcome sexual connotations. Sexual harassment may vary in form depending on circumstances. It may consist of, but not be limited to, any of the following:
- II. Unwelcome sexual advances, requests for sexual favors, display of sexual visuals, sexual audios, pornographic or obscene material and any other verbal or physical conduct of a sexual nature at workplace.
- III. Transmitting any message, by mail, telephone, e-mail etc. which is obscene, lewd, suggestive or blatantly sexual in nature at workplace.
- IV. Any explicit or implicit communications wherein a sexual favor or demand, whether by words or actions, is made a condition for an individual's employment, career progress, promotion etc. thereby creating a hostile environment.
- V. Sexually charged jokes or remarks and behavior which have sexually oriented innuendoes
- VI. Consistent pattern of unnecessary physical contact, staring or targeting unreasonable attention at an individual in day-to-day dealings
- VII. Any pervasive pattern of behavior which makes others uncomfortable, insecure or feel humiliated or disadvantaged on the basis of gender differentiation
- VIII. Actual sexual assault

As mentioned above, this is an indicative but not an exhaustive list of possible forms of sexual harassment.

GUIDELINES

The term 'Workplace' shall include but not be limited to Company Branch/Offices/transport, Company sponsored/organized off-site, training programs/ trips/ tours/ events/ seminars/ meetings/ conferences, including but not limited to overseas programs and trainings, and to any place visited by the colleague as an employee of the Company during his/her tenure with the BaidFin.

Colleagues should ensure that their comments and conduct are, at all times, professionally acceptable, appropriate and, if of a personal nature, welcome. In case of uncertainty, feedback should be sought from the other colleague as to whether what they are saying or doing is welcome or from HR as to whether what they are saying or doing might be perceived as unwelcome.

Colleagues are expected to attend and complete in a timely manner, all Anti-Sexual Harassment awareness sessions and trainings provided by the Company.

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All complaints from colleagues of sexual harassment should be submitted to the Company's Internal Complaint Committee. Any incident of sexual harassment may be reported to hr@baidgroup.in with the following details:

- a) The background of complainer;
- b) The nature/ type of the harassment;
- c) The relevant dates, if possible;
- d) The names of individuals against whom the allegations of sexual harassment are being made through the complaint;
- e) Evidence of sexual harassment, if any.

INTERNAL COMPLAINT COMMITTEE

1. The Company, in compliance with the Act, shall constitute an internal complaints committee by the name of 'INTERNAL COMPLAINT COMMITTEE AGAINST SEXUAL HARASSMENT' (the "Committee") for redressal of complaints of sexual harassment and for ensuring time bound treatment of such complaints.

2. The Committee as required by section 4 of the Act is being constituted at each administrative unit/officer situated in the main branch in every state where the Company is carrying out its operations.

3. The Committee shall comprise of the following members (at least two members must be women):

a) Presiding Officer who shall be a woman employed at senior level with the Company at the corporate office (In case a senior level woman employee is not available at a particular office, the Presiding Officer shall be nominated from other offices of the Company).

b) One member from non-governmental organizations or associations committed to the cause of women or a person familiar with the issues relating to sexual harassment.

c) Two or more employees nominated by the Company as members preferably committed to the cause of women or who have had experience in social work or have legal knowledge.

d) Any other Sr. Staff member nominated by the Company having experience in NBFC industry, issues around working of women at workplace.

4. The Committee is responsible for investigating every formal complaint of sexual harassment:

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- a) Taking appropriate remedial measures to respond to any substantiated allegations of sexual harassment ;
- b) Discouraging and preventing employment-related sexual harassment;
- c) Holding a formal meeting with the complainant to discuss the allegation of sexual harassment;
- d) Arranging individual interviews with the relevant witnesses (if any);
- e) Ensuring that the right of the Complainant and the witness to be accompanied by a work colleague at any meeting is duly exercised;
- f) Establishing the facts of the complaint, obtaining statements of the parties and the witnesses and collecting documentary evidence;
- g) Maintaining detailed records of the investigation process;
- h) Initiating new investigation, if necessary;
- i) Ensuring a fair investigation is being carried out
- j) Monitoring the investigation process to ensure confidentiality as per the terms of this Policy
- k) Passing a fair decision upon completion of the investigation.

5. The complaint should be made to the Committee, in the manner provided in the Act and the Rules made there under, within three months of incidence of sexual harassment and in case of a series of incidence of sexual harassment within three months from the date of last incidence.

6. Reporting Mechanism:

This committee shall send its report to the Board and this shall annually be disclosed in Directors report of the Company.

REDRESSAL PROCESS

- Colleagues who believe they have been victims of sexual harassment should report the incident(s), in writing, immediately to any member of the Committee, but not later than three months from the date of incident and in case of series of incident, within three months from the date of last incident date. (Delay in reporting makes it more difficult to establish the facts of a case and may contribute to the repetition of offensive behavior). Email can also be sent at e-mail id.

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- An initial discussion between the complainant and the complaint-receiving official is desirable and shall be encouraged and will be kept confidential to the extent allowed by law. The Committee shall maintain strict confidentiality while proceeding with the matter, in the interest of the aggrieved.
- A meeting between the Committee members shall be held appropriately and as soon as possible, wherein the complaint shall be heard and investigated by the members.
- The complainant can also submit any corroborative material with a documentary proof, if any, to substantiate his/her complaint.
- In the event, the complaint does not fall under the purview of 'sexual harassment' the committee shall drop the case under this head and may take up the issue as per the guidelines of Company's Code of Conduct.
- The committee shall maintain the documentation and endorse the complaint received.
- The committee may before initiating an inquiry take steps to settle the matter through conciliation. Once the settlement is arrived, no further inquiry shall be conducted by the Internal Committee.
- The committee may conduct the inquiry in the manner as prescribed under the law.
- The committee shall give recommendation towards appropriate action within 90 days of Complaint received, unless there are exceptional circumstances.
- The complainant /and also the person against whom the complaint has been made shall be called separately for an inquiry and he or she would be given an opportunity to present his or her case before the committee members.
- In case the person, against whom allegations have been made is held guilty, suitable disciplinary action would be taken. However if the complainant is found to have made false allegations, the concerned is liable for equally suitable disciplinary action.
- The Company shall seek legal course of action if any incident constitutes a criminal offence. In case any employee chooses to proceed with legal action against the offending employee either civil or criminal on his or her own, then the committee shall be entitled to start its internal inquiry/investigation suo-moto and recommend appropriate action.
- The Company shall ensure that the career interests of the complainant are not adversely affected by virtue of the individual having drawn attention to such an offence.

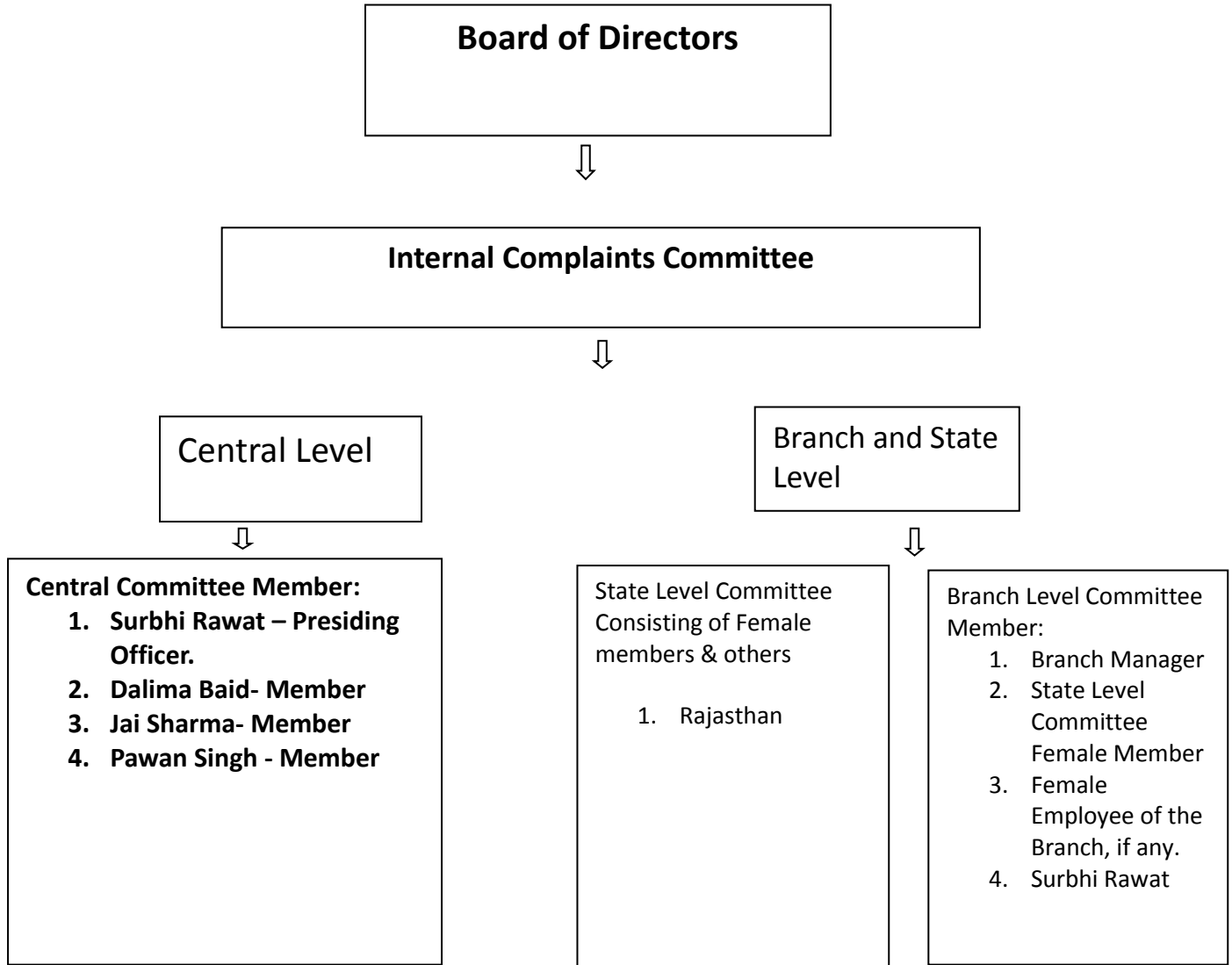
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- In case the Function Head/ Department Head/ Branch Head or any other employee is aware of incidents of 'sexual harassment', then they can put up the complaint before the committee and action can be precipitated accordingly by the committee
- The committee would communicate recommendations to the Management within 10 days of completion of inquiry. Management may act upon the recommendations within 30 days of its receipt.

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Note: being external member shall be members at all levels.

Any aggrieved employee can write directly at hr@baidgroup.in if there is inordinate delay in inquiry or the employees is not satisfied with the outcome of proceedings.

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DISCIPLINARY ACTION

- Sexual harassment will not be tolerated at BaidFin. If the outcome of the investigation by the committee, upon any allegation of 'sexual harassment' shows that harassing behavior has taken place, the harasser will be subject to disciplinary action upto and including termination of employment besides other actions as may be provided under the relevant laws.
- In case any such conduct amounts to a specific offence under the Indian Penal Code or under any other law, the Company may initiate appropriate action in accordance with law by making complaint to the appropriate authority.

CONFIDENTIALITY

The contents of the complaint, the identity and addresses of the aggrieved employee, respondent and witnesses, any information relating to conciliation and inquiry proceedings, recommendations of the committee and the action taken by BaidFin shall not be published, communicated or made known to the public, press and media in any manner. All complaints / grievances of sexual harassment will be taken seriously, will be held in strict confidence and will be investigated promptly in an impartial manner. For the purpose of completing the investigation, key witnesses or other stakeholders may be required to be taken into confidence at the strict discretion of the committee.

AMENDMENT OF THE POLICY

This policy may be amended, modified, varied or waived by the Board as may be deemed necessary in the interests of the Company and subject to the provisions of applicable laws, regulations or guidelines, the amendment shall be initiated by HR Department for the same.

DISCLAIMER

While this policy has been made as informative as possible and structured to ensure quick and easy interpretation by all employees, you are encouraged to reach out to your concerned HR Business Partner if you must seek clarity on any aspect related to this policy. As and when there's an amendment to this policy, the updated policy document will be shared by the HR department through the appropriate channel of communication.

In case of any ambiguity related to understanding of this policy, the final interpretation by the management and the HR Head will be considered as applicable.

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POLICY REVIEWS

The policy shall be reviewed annually and necessary updates shall be made based on the requirements.

POLICY AMENDMENT AUTHORITY

Key owners responsible for Policy amendments

Policy Owners	Role
Head of HR	Responsible for implementation of Policy Responsible for ensuring the policy is reviewed annually

No employee will be subject to any form of retaliation for making a good faith report of conduct that they believe violates the afore mentioned policies.

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Proposed by:	
Name	Signature
Mr. Jai Sharma, Human Resource Department	
Reviewed by:	
Mr. Aman Baid, Whole Time Director	

Approving Authority	Board of Directors
Date of Approval/ Review	November 14, 2024

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