



POLICY AGAINST SEXUAL HARASSMENT

1. INTRODUCTION

Sonata Finance Private Limited (“**Company**”) is committed to providing equal opportunity to its employees and strives at creating a healthy working environment that enables employees to work without fear of prejudice, gender bias and sexual harassment. The Company also believes that all employees of the Company have the right to be treated with respect and dignity. Sexual harassment is a grave offence and is, therefore, punishable.

Therefore, the focus of this Policy is directed to ensure a zero-tolerance towards verbal, psychological conduct of a sexual nature by any employee or stakeholder that directly or indirectly harasses, disrupts, or interfaces with another’s work performance or that creates an intimidating, offensive, or hostile environment.

This Policy is aimed at educating employees of their rights against any form of unwelcome sexual behaviour and to provide firm yardsticks that shall not be crossed while in employment with the Company. This Policy is made under the overall ambit and in accordance with the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (“**Act**”).

2. WHAT CONSTITUTES SEXUAL HARASSMENT?

“**SEXUAL HARASSMENT**” includes any ‘unwelcome’ sexually determined behaviour (whether directly or by implication), such as:

Physical contact and advances

Demand or a request for sexual favours

Making sexually coloured remarks

Showing pornography

Other unwelcome physical, verbal / non -verbal conduct of sexual nature



Such inappropriate sexual behaviour could be expressed by way of verbal, non-verbal or physical conduct such as obnoxious comments or utterances, remarks or jokes, letters, phone calls, messages or emails, gestures, stalking, sounds or display of a nature with sexual overtures.

In order for an aggrieved to make an assessment if a certain conduct was indeed an unwelcome sexual act, the circumstances that surround such behaviour should be assessed, such as when a demand or request for sexual favours in return of implicit/explicit promises of work related preferential treatment such as performance appraisals, promotions, transfers, salary increases and employment or any other form of reward or recognition, implicit/explicit threat of detrimental treatment, interference with work or creating a hostile work environment or any humiliating treatment likely to affect health or safety of the aggrieved.

Every employee is to bear in mind that the above are merely indicators of what could be sexual harassment and is not an exhaustive explanation of its ambit.

3. ALWAYS KEEP IN MIND!

If a person suspects being sexually harassed:

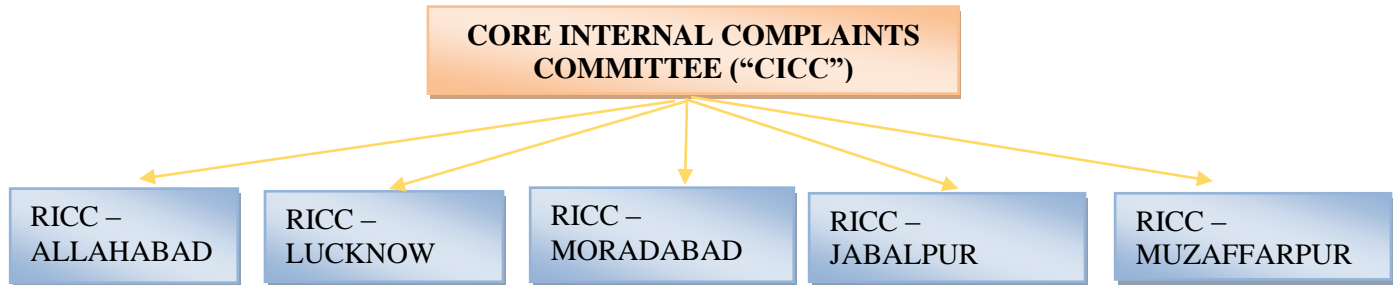
- ✦ **Speak Out:** Tell the accused, clearly and firmly, that his/her behavior is unwelcome and ask him/her to stop. Speaking out is an effective tool in combating harassment.
- ✦ **Gather Evidence:** Keep record of all incidents (dates, times, messages, notes, locations, possible witness, what happened, 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.
- ✦ **Take Action:** File a complaint as soon as possible.

4. WHAT ARE THE KEY DETERMINING FACTORS FOR A COMPANY INVESTIGATION?

- ✦ *The aggrieved should be a person who is authorized to be associated with the Company, including but not limited to regular , temporary, ad-hoc employees, consultants, and Executive / Management Trainee;*
- ✦ *The alleged accused should be a person under the control and supervision of the Company;*
- ✦ *There should have been an act of unwelcome sexual behavior falling within the ambit of 'Sexual Harassment';*
- ✦ *The alleged act of sexual harassment should have been committed in the Company premises or areas which can be termed as a notional extension of the Company premises such is Company transportation, Company Offsite, etc;*

5. WHERE IS THE COMPLAINT TO BE FILED?

The Company is determined to ensure that its employees are treated in a professional manner with utmost safety and any breach or threatened breach of this commitment will be taken up by the Company in a serious manner to ensure justice and fair treatment to all. In order to not only set forth guidelines of professional behaviour by way of this Policy but to ensure an effective mechanism of redress of any grievance that may be faced by an employee while in employment with the Company, in accordance with the Act, Company has set up the following investigative mechanism:



^ **RICC – REGIONAL INTERNAL COMPLAINTS COMMITTEE**

^ **Details of Members of CICC & RICC are set out in Annexure A**

6. INVESTIGATION PROCESS

Every investigation will be conducted by the RICC and the CICC in a detailed, transparent and effective manner based on the principles of natural justice. Every employee will be given equal treatment during the investigation process and any aggrieved is urged to take action for any legitimate complaint in the following manner:

- ✦ **Step 1:** An aggrieved can file a written complaint with the concerned RICC within 3 months of the last occurrence of the alleged incident of Sexual Harassment. However, the 3 month period can be extended at the sole discretion of the RICC for a further period of 3 months. Any person can make a complaint on behalf of the aggrieved provided that the aggrieved has given her written consent to such complaint. In the event that the complaint cannot be made in writing, any member of the RICC will render all reasonable assistance to the aggrieved for making the complaint in writing.

Along with complaint, the aggrieved can choose to opt for a conciliation process where under, if a settlement (except for monetary settlement) is arrived at, then no further investigation process will be conducted by the CICC or the RICC as applicable, unless the alleged accused is not in compliance with the settlement terms. No aggrieved can seek a monetary settlement through the conciliation process.

- ✦ **Step 2:** Once the RICC receives such written complaint (*without a request for conciliation*), the RICC will determine whether such complaint will be investigated by the RICC or whether the same will be forwarded to the CICC for investigation.
- ✦ **Step 3:** The RICC or CICC as relevant will conduct a formal investigation based on the complaint and will arrive at an appropriate recommendation which shall be implemented by the management of the Company. During the investigation process, the RICC or CICC as relevant shall be entitled to request for production and discovery of documents and/or summon and enforce attendance of any person and examine such person under oath.
- ✦ **Interim Relief:** During an investigation process, the aggrieved shall be entitled to request the RICC or CICC to recommend to the management for provision of appropriate interim relief in accordance with the Act.



7. INQUIRY REPORT

The Committee shall provide an action report to the employer within the 10 days of completion of Inquiry & the findings report shall be provided to both of the concerned parties.

Committee will take action as a misconduct in accordance with the provision of the service rules applicable to the respondent or where there is no such rules then action will be taken as prescribed in the act.

The employer should act upon the recommendation of committee within sixty days of its receipt of the report

8. POSSIBLE OUTCOME OF THE INVESTIGATION

- ✦ If the complaint is failed to be proved, the RICC or the CICC as applicable, shall report to the management with the conclusion of the proceedings with no action to be taken;
- ✦ If the complaint is proved, the RICC or the CICC as applicable, shall report to the management with the conclusion of the proceedings and pass any recommendation as it deems appropriate including but not limited to:
 - ✓ A letter of warning that will be placed in the personal file of the accused.
 - ✓ Immediate transfer or suspension without pay or both.
 - ✓ Cash Fine.
 - ✓ Stoppage of increment with or without cumulative effect.
 - ✓ Reduction in rank.
 - ✓ Termination/dismissal from the services of the Company.
 - ✓ Filing a Complaint before the relevant police station/Court.

9. PUNISHMENT FOR FALSE OR MALICIOUS COMPLAINT AND FALSE EVIDENCE

- ✦ In case if committee arrives at conclusion that the allegation against the respondent is false and the false evidence and misleading documents were produced in front of committee than employer shall take action in accordance with the provisions of the service rules which may include dismissal from the services of the Company or where no such service rules exist then action may be taken as prescribed in act.

10. APPEAL

If an aggrieved is dissatisfied with the outcome of the investigation conducted by the RICC, the aggrieved shall have the right to make an appeal to the, within 30 days of the date of conclusion of the investigations proceedings before the CICC.



11. ASSURANCE OF NON-RETALIATION

This Policy seeks to encourage all employees to express freely, responsibly, and in an orderly way opinions and feelings about any problem or complaints of Sexual Harassment. Regardless of the outcome of the complaint made in good faith, the employee lodging the complaint and any person providing information or any witness, will be protected from any form of retaliation. While dealing with complaints of Sexual Harassment, the RICC and the CICC shall ensure that the complainant or the witness are not victimized or discriminated against by the accused. Any unwarranted pressures, retaliatory or any other type of unethical behavior from the accused against the complainant while the investigation is in progress should be reported by the complainant to the RICC or the CICC as soon as possible. Disciplinary action will be taken by the RICC and the CICC against any such complaints which are found genuine.

12. CONFIDENTIALITY

The Company will do everything consistent with enforcement of this Policy and with the law to protect the privacy of the individuals involved and to ensure that the aggrieved and the accused are treated fairly. All information received shall be kept confidential. Any person (including witnesses) who breaches confidentiality shall be subject to serious disciplinary action.

13. COUNSELING AND SUPPORT

The Company has set up a counseling team which will provide counseling services to the aggrieved on request. This counseling team does not investigate allegations but only provide counseling and support.

As the Company is dedicated to safeguard its employees within the work place and otherwise, if any employee is facing any form of Sexual Harassment from any person outside the purview of the Company's investigative and redressal process, the Company will extend necessary support to the employee in any action that such employee intends to take under law. The details of the counselling team are set out in Annexure B.



ANNEXURE A

DETAILS OF MEMBERS OF THE CICC & RICC

Core Internal Complaint Committee

S.No.	Name	Location	Email Id	Contact No.
1	Richa Sharma	Head Office	richa.sharma@sonataindia.com	7388 898 635
2	HR Head	Head Office	shilpi.shrey@sonataindia.com	8400 333 788
3	Tarun Shrivastava	Head Office	tarun.shrivastava@sonataindia.com	8400 333 781
4	Sujeet Pathak	Head Office	sujeet.pathak@sonataindia.com	8400 333 665
5	External Advisor **			

** Ms. Deepali Kakkar & Ms. Pratima Tiwari , member from non government organisations

Regional Internal Complaint Committee - Allahabad

S.No.	Name	Location	Email Id	Contact No.
1	Priyanka Srivastava	Allahabad DO	priyanka.srivastava@sonataindia.com	8400 333 800
2	Dalpreet Kaur	Allahabad DO	dalpreet@sonataindia.com	8400 333 715
3	Vinay Singh	Allahabad DO	vinay.singh@sonataindia.com	8400 333 773
4	Umesh Diwedi	Allahabad DO	umesh.diwedi@sonataindia.com	8400 333 790
5	External Advisor **			

** Ms. Deepali Kakkar & Ms. Pratima Tiwari , member from non government organisations

Regional Internal Complaint Committee - Lucknow

S.No.	Name	Location	Email Id	Contact No.
1	Pratibha Gupta	Lucknow DO	pratibha@sonataindia.com	8400 333 469
2	Farina Sheikh	Lucknow DO	farina@sonataindia.com	7080 203 673
3	Dharmendra Singh	Lucknow DO	dharmendra.singh@sonataindia.com	9919 335 999
4	Saif Khan	Head Office	saif.khan@sonataindi.com	8400 333 670
5	External Advisor **			

** Ms. Deepali Kakkar & Ms. Pratima Tiwari , member from non government organisations



Regional Internal Complaint Committee - Moradabad

S.No.	Name	Location	Email Id	Contact No.
1	Sonal Sharma	Moradabad DO	sonal.sharma@gmail.com	8400 333 469
2	Rashi Jain	Moradabad DO	rashi.jain@sonataindia.com	7897 995 755
3	Anil Singh	Moradabad DO	anil.singh@sonataindia.com	7389 940 040
4	Ashraf Siddiqui	Moradabad DO	ashraf.ali@sonataindia.com	8400 333 649
5	External Advisor **			

** Ms. Deepali Kakkar & Ms. Pratima Tiwari , member from non government organisations

Regional Internal Complaint Committee - Jabalpur

S.No.	Name	Location	Email Id	Contact No.
1	Reema Das	Jabalpur DO	reema@sonataindia.com	8400 333 469
2	Poonam Soni	Jabalpur DO	poonam.soni@sonataindia.com	7869 919 737
3	Rohit Singh	Jabalpur DO	rohitsingh@sonataindia.com	8400 333 609
4	Deep Narayan Tripathi	Jabalpur DO	dn.tripathi@sonataindia.com	7389 940 003
5	External Advisor **			

** Ms. Deepali Kakkar & Ms. Pratima Tiwari , member from non government organisations

Regional Internal Complaint Committee - Muzaffarpur

S.No.	Name	Location	Email Id	Contact No.
1	Priyanka Srivastava	Muzaffarpur DO	priyanka.srivastava@sonataindia.com	8400 333 800
2	Shobhana Jha	Muzaffarpur DO	shobhana@sonataindia.com	7091 092 001
3	Vinod Singh	Muzaffarpur DO	vinod.singh@sonataindia.com	8400 333 799
4	V P Singh	Muzaffarpur DO	vishwanath.singh@sonataindia.com	8400 333 646
5	External Advisor **			

** Ms. Deepali Kakkar & Ms. Pratima Tiwari , member from non government organisations

Note:- The members of ICC and RICC are subject to change from time to time as per discretion of the management of the Company. Any change in committee shall be duly notified and informed within 7 business days of the change.



ANNEXURE B

DETAILS OF MEMBERS OF COUNSELING TEAM

Emp No	Name	Location	Email ID	Mobile No
1.	Reema Das	Jabalpur	reema@sonataindia.com	7389945745
2.	Priyanka Srivastava	ALD	priyanka.srivastava@sonataindia.com	8400333800
3.	Neha Singh	HO-LKO	neha.singh@sonataindia.com	8400333565
4.	Pratibha Gupta	LKO	pratibha.gupta@sonataindia.com	8400333469
5.	Ankita Singh	HO-LKO	ankita.singh@sonataindia.com	8400333948
6.	Anubhuti Singh	ALD	anubhuti.singh@sonataindia.com	8400333434
7.	Rashi Jain	ALD	rashi.jain@sonataindia.com	8400333689
8.	Sonal Sharma	Moradabad	sonal.sharma@sonataindia.com	8400333470
9.	Poonam Dhuria	ALD	poonam.dhuriya@sonataindia.com	8400333542
10.	Dalpreet Kaur	ALD	dalpreet@sonataindia.com	8400333715
11.	Farina Sheikh	LKO	farina@sonataindia.com	7080203673



ANNEXURE C

RECEIPT AND ACKNOWLEDGEMENT

This is to acknowledge that I have received an e-copy of the Company's Policy against Sexual Harassment. I understand and agree that it is my responsibility to read and familiarize myself with all of the provisions of the Policy.

I understand that the provisions of this Policy and acknowledge that the Company reserves the right to amend, modify, rescind, delete, supplement or add to the provisions of this Policy as it deems appropriate from time to time in its sole and absolute discretion.

I am committed to abide by the policy and to act in a professional manner that will respect the dignity of my colleagues, seniors, subordinates & visitors.

Date:<_____>

Signed:<_____>

(Employee/ Third Party)