

Policy for Prevention, Prohibition and Redressal of Sexual Harassment at Workplace (“Policy”)

Applicable to Centrum Capital Limited and its subsidiaries/ affiliates i.e.

Acorn Fund Consultants Private Limited
CCAL Investment Management Limited
Centrum Housing Finance Limited
Centrum Alternatives LLP
Centrum Broking Limited
Centrum Capital Advisors Limited
Centrum Capital International Limited
Centrum Alternative Investment Managers Limited
Centrum Financial Services Limited

Centrum Insurance Brokers Limited
Centrum International Services PTE Limited
Centrum Investment Advisors Limited
Centrum Microcredit Limited
Centrum REMA LLP
Centrum Retail Services Limited

Centrum Wealth Management Limited

(The above list shall stand modified upon addition/ deletion/ modification in/ by the Centrum Group).

CONTENTS

PREAMBLE:

Centrum Capital Limited is an equal opportunity employer and is committed to creating a healthy and productive working environment that enables employees to work without fear of prejudice, gender bias and sexual harassment.

Protection against Sexual Harassment and right to work with dignity are universally recognised human rights. The Company is committed to creating a healthy working environment, and promotes equality of opportunity and freedom that enables Employees to work without fear of prejudice, gender bias and Sexual Harassment.

The Company believes that Sexual Harassment at workplace is a grave offence. The Company holds the responsibility to identify and prevent Sexual Harassment and to develop a culture of "zero tolerance" for any form of Sexual Harassment at the Workplace.

The policy is named as "Policy for Prevention, Prohibition and Redressal of Sexual Harassment at Workplace" mentioned hereinafter as "the Policy", which is an act to provide protection against sexual harassment of any employee at workplace and for the prevention and redressal of complaints of sexual harassment of or for matters connected therewith or incidental thereto.

APPLICABILITY:

The Policy is applicable to all the employees of Centrum Capital Limited and all its current subsidiaries/ affiliates and such other subsidiaries/ affiliates that may become subsidiaries/ affiliates from time to time, irrespective of their level, rank or designations across all departments, functions, operations, units, and offices (including, branch, administrative and regional) of the Company and is deemed to be incorporated in the service conditions of all the Company employees and comes into effect forthwith.

Where Sexual Harassment occurs at Workplace as a result of an act or omission by any Third Party or outsider, the Company will take all steps necessary and reasonable to assist the Aggrieved Person in terms of support and preventive action.

The Policy is only an internal code of conduct and one of the measures to prevent, prohibit and redress sexual harassment at workplace. It will be the fiduciary responsibility of each employee to ensure compliance of the Policy and the applicable rules/ regulations/ acts at all points in time.

1. DEFINITIONS:

Except where the context otherwise requires, the following words and expressions shall have the following meanings: -

- a) "**Aggrieved person**" means a person of any age, whether employed or not, who alleges to have been subjected to any act of Sexual Harassment by the Respondent.
- b) "**Company**" means Centrum Capital Limited and all its current subsidiaries/ affiliates (as

detailed on Page no. 1 above) and such other subsidiaries/ affiliates that may become subsidiaries/ affiliates from time to time. Each or all of which are hereinafter referred to as “the Company”.

- c) **"Complaint"** means information, either oral or written, made by the Aggrieved person/ Complainant. However, complaint made orally must be reduced in writing with the assistance of the Internal Complaint Committee members.
- d) **"Employee"** for the purpose of this Policy, means and includes any person hired by the Company, whether as a consultant or as an employee on the rolls of the Company who is employed for any work on regular, temporary, ad-hoc or daily wage basis, directly or through an agent, including a contractor, with or, without the knowledge of the Company's management, whether for remuneration or not, or working on voluntary basis or otherwise, whether the terms of employment are express or implied and includes a co-worker, a contract worker, probationer, trainee, apprentice, article clerk or called by any other such name.
- e) **"Internal Complaints Committee"** means a committee constituted for redressal of Complaints by the Aggrieved Person and make recommendations for resolution to the Management Team;
- f) **"Management Team"** shall mean the person/s vested with the powers to take appropriate action for implementing the decision of the Internal Complaints Committee and shall consist of such officer/s as designated by the Company from time to time;
- g) **"Respondent"** means a person against whom the Aggrieved Person has made a Complaint;
- h) **"Sexual Harassment"** includes any one or more of the following unwelcome acts or behavior (whether directly or by implication):
 - (i) Physical contact and advances; or
 - (ii) A demand or request for sexual favors; or
 - (iii) Making sexually colored remarks; or
 - (iv) Showing pornography; or
 - (v) Any other unwelcome physical, verbal or non-verbal conduct of a sexual nature.

Additionally, any of the following, in relation to or connected with the above, will constitute sexual harassment:

- (i) implied or explicit promise of preferential treatment in employment; or
- (ii) implied or explicit threat of detrimental treatment in employment; or implied or explicit threat about present or future employment status; or interference with their work or creating an intimidating or offensive or hostile work Environment; or
- (iii) Humiliating treatment likely to affect their health or safety.

- i) **"Third Party"** means any person or persons not on the rolls of the Company but, in the course

of work related activities, interacting with the Company or its Employees;

j) **“Workplace”** shall mean any place(s) where an Aggrieved Person is employed or works, or visits in connection with his/ her duties during the course of or arising out of his employment and includes transportation provided by the employer for undertaking such journey;

2. PREVENTION OF SEXUAL HARASSMENT AT WORKPLACE & REPORTING:

No Employee shall be subjected to Sexual Harassment at any Workplace. If an Employee is being sexually harassed, he/ she should:

- a) Tell the Respondent 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, Aggrieved Person’s response). It is not mandatory to have a record of events to file a Complaint, but a record can strengthen the Aggrieved Person’s case and help the Aggrieved Person remember the details over time, in case the Complaint is not filed immediately;
- c) Make, in writing, a Complaint to the Internal Complaints Committee within a period of three months from the date of last incident in accordance with the terms of the Policy.

3. INTERNAL COMPLAINTS COMMITTEE:

- a) The Internal Complaints Committee shall consist of not less than four members, to be nominated by the Company. Provided that at least one-half of the total members so nominated shall be women.
- b) The Committee shall be headed by a woman employed at a senior level at Workplace, who shall be its presiding officer;
- c) Not less than two members of the Internal Complaints Committee shall be from amongst Employees preferably committed to the cause of women or who have had experience in social work or have legal knowledge;
- d) One member of the Internal Complaints Committee shall be from amongst non-governmental organization or associations committed to the cause of women or a person familiar with the issues relating to Sexual Harassment;
- e) The presiding officer and members of the Internal Complaints Committee shall hold office for such period, not exceeding three years, from the date of their nomination;

The names, email ids and contact details of the presiding officer and other members of the Internal Complaints Committee(s) is uploaded on HR portal and also communicated through a separate circular.

4. COMPLAINT MECHANISM:

a. Complaint to be made in writing:

- i. A Complaint may be made in writing to the Internal Complaints Committee as per the format prescribed under **Annexure A** at nirbhay@centrum.co.in or at the email id of any member of the Internal Complaints Committee. Alternatively, the complaint can also be sent as per the said format at the following address:

Internal Complaints Committee,
Centrum Capital Limited
Centrum House, 8th Floor,
Vidyanagari Marg, CST Road,
Kalina, Santacruz (East)
Mumbai – 400 098.

- ii. In case the Aggrieved Person is unable to make the Complaint in writing he/she may approach the presiding officer or any member of the Internal Complaints Committee, who shall render all assistance to the Aggrieved Person for making the Complaint in writing.
- iii. The Complaint shall be addressed to the Internal Complaints Committee and shall contain all the material and relevant details concerning the alleged Sexual Harassment at Workplace including, the name of the Respondent(s) and the name of the Aggrieved Person along with the names and addresses of the witnesses and supporting documents.
- iv. At the time of filing the Complaint, the complainant shall submit two copies of the Complaint along with the names and addresses of the witnesses and supporting documents.

b. The following persons can make a Complaint:

- i. Aggrieved Person,
- ii. In case of physical incapacity of the Aggrieved Person, the Complaint can be filed by:
 - 1) A relative or a friend or a co-worker of the Aggrieved Person; or
 - 2) An officer of the National Commission of Women or State Women's Commission; or
 - 3) Any person who has knowledge of the incident, with the written consent of the Aggrieved Person.

c. In case of mental incapacity of the Aggrieved Person the Complaint can be filed by:

- i. A relative or a friend of the Aggrieved Person; or
 - ii. A special educator; or
 - iii. A qualified psychiatrist or psychologist; or
 - iv. The guardian or authority under whose care the Aggrieved Person is receiving treatment or care; or
 - v. Any person who has knowledge of the incident jointly with a relative or a friend of the Aggrieved Person or a special educator or a qualified psychiatrist or psychologist, or the guardian or authority under whose care the Aggrieved Person is receiving treatment or care.
- d. In case of death of the Aggrieved Person, the Complaint can be filed by any person who has knowledge of the incident with the written consent of the legal heir of the Aggrieved Person.
- e. In case the Aggrieved Person is unable to make a Complaint for any reason, the Complaint can be filed by any person who has knowledge of the incident with the written consent of the Aggrieved Person.

f. Timeline for making the Complaint:

A Complaint should be made within a period of three months from the date of the incident and in case of series of incidents, within a period of three months from the date of the last incident.

Provided that the Internal Complaints Committee may, for reasons to be recorded in writing, extend the time limit not exceeding three months, if it is satisfied that the circumstances were such which prevented the Aggrieved Person from filing a Complaint within the period of three months.

5. CONCILIATION:

- a) The Internal Complaints Committee may before initiating an inquiry and at the request of the Aggrieved Person take steps to settle the matter between the Aggrieved Person and the Respondent through conciliation.

Provided that no monetary settlement shall be made as a basis of conciliation.

- b) Where a settlement has been arrived at by conciliation, the Internal Complaints Committee shall record the settlement so arrived and forward the same to the Management Team to take action as specified in the recommendation.
- c) The Internal Complaints Committee shall provide the copies of the settlement as recorded under the settlement so arrived to the Aggrieved Person and the Respondent.
- d) Where a settlement is arrived at through conciliation, no further inquiry shall be conducted by the Internal Complaints Committee.

Provided where the Aggrieved Person informs the Internal Complaints Committee that any term of the settlement so arrived has not been complied with by the Respondent, the Internal Complaints Committee shall proceed to make an enquiry into the Complaint, or as the case may be, forward the Complaint to the police.

6. INQUIRY INTO COMPLAINT:

a. Manner of Inquiry:

- i. Internal Complaints Committee shall proceed to make inquiry into the Complaint where the Respondent is an Employee.
- ii. On the receipt of the Complaint, the Internal Complaints Committee shall, within seven working days from the date of receipt of the Complaint, send a copy of the Complaint received from the Aggrieved Person to the Respondent.
- iii. The Respondent shall file his reply to the Internal Complaints Committee along with the names and addresses of the witnesses and supporting documents within a period not exceeding ten working days.
- iv. The Internal Complaints Committee shall make an enquiry into the Complaint in accordance with the principles of natural justice.
- v. The Aggrieved Person and the Respondent shall not be allowed to bring in any legal practitioner to represent them in their case at any stage of the proceedings before the Internal Complaints Committee.
- vi. In conducting the inquiry, a minimum of three members of the Internal Complaints Committee including the presiding officer shall be present.
- vii. The parties shall, during the course of inquiry, be given an opportunity of being heard and a copy of the findings shall be made available to both the Aggrieved Person and the Respondent to enable them to make representation against the findings before the Internal Complaints Committee.
- viii. For the purpose of making an inquiry, the Internal Complaints Committee shall have the same powers as are vested in a civil court under the Code of Civil Procedure, 1908 (5 of 1908) when trying a suit in respect of the following matters, namely: --
 - 1) Summoning and enforcing the attendance of any person and examining him on oath;
 - 2) Requiring the discovery and production of documents: and
 - 3) Any other matter which may be prescribed.
- ix. The inquiry shall be completed within a period of ninety days.

b. Actions during pendency of Enquiry:

- i. During the pendency of an inquiry, the Internal Complaints Committee at the written request of the Aggrieved Person may recommend to the Management Team to:
 - 1) Transfer the Aggrieved Person or the Respondent to any other Workplace; or
 - 2) Grant leave to the Aggrieved Person up to a period of three months; or
 - 3) Restrain the Respondent from reporting on the work performance of the aggrieved person or writing his/her confidential report, and assign the same to another person.
- ii. The Internal Complaints Committee if so required may issue appropriate interim orders from time to time recommending the Management Team to issue orders as may be necessary to ensure the safety of the aggrieved person and/or the witnesses.
- iii. On recommendations of the Internal Complaints Committee, the Management Team shall implement the recommendations of the Internal Complaints Committee and send the report of such implementation to the Internal Complaints Committee.

c. Termination of Inquiry Proceedings / Ex parte Decision:

The Internal Complaints Committee shall have the right to terminate the inquiry proceedings or give an ex parte decision on the Complaint, if the complainant or Respondent fails, without sufficient cause, to present herself or himself for three consecutive hearings conveyed by the presiding officer of the Internal Complaints Committee. Provided such termination or ex parte order shall not be passed unless a fifteen days prior written notice has been given to the party concerned.

7. INQUIRY REPORT:

On the completion of the inquiry, the Internal Complaints Committee shall provide a report of its findings to the Management Team within a period of ten days from the date of completion of the inquiry and such report shall be made available to the parties concerned. The Internal Complaints Committee may recommend a detailed and reasoned order, which may include:

- i. Recommending to the Management Team to take appropriate action for Sexual Harassment as a misconduct in accordance with the HR Manual/ Code of Conduct/ terms of employment and/or payment of compensation, commensurate with the gravity of the offence of which the Respondent has been found guilty of as per applicable law;
- ii. Recommending the Management Team steps necessary and reasonable to assist the Aggrieved Person in terms of support and preventive action where Sexual Harassment at Workplace has occurred as a result of an act or omission by any Third Party or outsider;
- iii. Recommending to the Management Team appropriate disciplinary action against the person making the Complaint, in case the Complaint registered is found to be frivolous or false or was made with a malicious intention;

- iv. Recommending the to the Management Team that no action is required to be taken in the matter, in case it arrives at the conclusion that the allegation against the Respondent has not been proved.

8. CONFIDENTIALITY:

- a. Information generated in the course of informal reviews and formal investigations necessary for enforcing this Policy will be given the full extent of confidentiality to Employee personnel records. Any person who, without authorization, reveals such information will be subject to disciplinary action.
- b. The sharing of the content of the Complaints will be on a “need to know” basis only. It is understood that Sexual Harassment at Workplace is an issue of highly sensitive nature and therefore strict confidentiality will be maintained by the affected person/victim, defendant, witnesses, the Internal Complaints Committee and the Management Team.

9. PROTECTION AGAINST RETALIATION:

Regardless of the outcome of the Complaint made in good faith, the Aggrieved Person lodging the Complaint and any person providing information or any witness, will be protected from any form of retaliation. While dealing with Complaints, the Internal Complaints Committee shall ensure that the Aggrieved Person or the witness are not victimized or discriminated against by the accused. Any unwarranted pressures, retaliatory or any other type of unethical behaviour from the accused against the Aggrieved Person while the investigation is in progress should be reported by the Aggrieved Person to the Internal Complaints Committee as soon as possible.

Disciplinary action will be recommended by the Internal Complaints Committee to the Management Team against any such Complaints.

10. COMPLAINTS MADE WITH A MALICIOUS INTENT:

The Policy has been evolved as a tool to ensure that Employees have a forum to approach the Company in the event of instances of Sexual Harassment at Workplace. Where the Internal Complaints Committee arrives at the conclusion that the allegation against the Respondent is malicious or the Aggrieved Person or the person making the Complaint has made the Complaint knowing it to be false or the Aggrieved Person or any other person making the Complaint has produced any forged or misleading documents, it may recommend appropriate disciplinary against the complainant. The persons who are victims of such frivolous or false complaints may, in addition to the above, seek legal remedies as may be provided under the various laws for the time being in force.

ANNEXURE A

FORMAT FOR REPORTING SEXUAL HARASSMENT AT WORKPLACE COMPLAINTS

To,
The Internal Complaints Committee

Sexual Harassment details:

[You may attach additional sheets if necessary to provide the details]

a) Person/people involved in Sexual Harassment at Workplace: [Please provide the full name(s), designation, location(s), Vertical of the Respondent and the relationship with you (e.g. supervisor, colleague, etc.)]

b) Incidents and factual data: [Please describe the incident/s]

Your response to the incident/s

c) Other material and relevant details: [Please provide date/s, place/s of the incident/s, name and addresses of the witnesses, details of text messages, emails, if any, etc.]

Person making the Complaint is [please tick]:

- a) Aggrieved Person.
- b) A relative of the Aggrieved Person.
- c) A friend of the Aggrieved Person.
- d) A co-worker with the Aggrieved Person.
- e) An officer of the National Commission of Women.
- f) An officer of the State Women's Commission.
- g) A special educator.
- h) A qualified psychiatrist or psychologist.
- i) The guardian or authority under whose care the Aggrieved Person is receiving treatment or care.
- j) A person who has knowledge of the incident with the written consent of the Aggrieved Person.
- k) A person who has knowledge of the incident with the written consent of the legal heir of the Aggrieved Person.
- l) A person who has knowledge of the incident jointly with a relative or a friend of the Aggrieved Person or a special educator or a qualified psychiatrist or psychologist, or the guardian or authority under whose care the Aggrieved Person is receiving treatment or care.

Date: _____

Place: _____

Name of the person(s) reporting: _____

Designation: _____

Department: _____

Location: _____ Office No: _____

_____ Official email Id: _____

Complete office address with Pin Code: _____

Mobile No: _____

Personal email Id: _____

Complete residence address with Pin Code: _____

Residence Phone No: _____

Signature: _____