

1) INTRODUCTION

Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Policy

Objective:

At NeoGrowth, there is zero tolerance for sexual harassment at workplace. Our endeavor is to have a non-discriminatory environment with equality of opportunity to all employees so that they can give their best. In response to the Supreme Court guidelines on Sexual Harassment at workplace and as per new Act, necessary modifications have been made in the policy.

Scope and Applicability:

This policy covers all employees of NeoGrowth whether permanent, temporary, full time, part time, and contractual or outsourced employees.

All female employees of NeoGrowth can complain to the Sexual Harassment Redressal Committee (SHR committee). The female employees may be permanent, temporary, full time, part time, contractual or outsourced employees.

Definitions and Explanations of Sexual harassment:

Sexual harassment is hereby defined as any conduct that is sexual in nature and unwelcome, imposed upon and unreciprocated by the recipient. This type of harassment is defined by its impact on the recipient and not the intent of the harasser.

The impact may cause deep effect on the receiver of such harassment thus causing the work environment to become unfavorable. Such harassment may negatively impact the performance of the person who is at the receiving end of this harassment.

Sexual harassment is identified into two primary categories:

- Quid Pro Quo harassment.
- Hostile environment harassment

(i) Quid pro quo:

This refers to the demands for sexual favors made by the offender to the recipient of favorable work conditions, increase in salary, higher position in the organization, etc.

(ii) Hostile environment:

This refers to the creation of unfriendly atmosphere for the recipient of sexual harassment by the harasser due to refusal of granting sexual favors, thus making the organizational environment non-conducive and less productive.

Work place:

Work place includes any place where the employees of the organization carry out tasks to further the organizational goals and objectives. The grieved party will be provided support to carry out necessary action as and when required.

Employee/Staff:

An employee of NeoGrowth is an individual who has been appointed by the company to carry out certain tasks so as to further the organizational goals and objectives. It covers all the staff on the payroll including the field staff, part time staff, incentive based, consultants, student trainees, visitors' third party staff etc.

Third party:

A third party refers to any individual or member of any group/organization that is/are associated with the group/organization. Examples of third party include sexual harassment to Group's Staff by the volunteers, students, visitors, community members, NGOs, CBOs and Hospital & Health Post Staff.

Preventive Action

Preventive action will be taken in the organization so as to evade any instances of sexual harassment. The efforts of the management will be as follows:

(i) Gender sensitization workshops:

The Group is highly sensitive to this menace and is convinced that there is a need to conduct gender sensitization workshops for employees at all levels as well as for third party individuals/groups. These workshops will aim at eliminating any gender biases of individuals, making them more gender sensitive.

(ii) Workshops on Sexual Harassments at the workplace:

Such workshops will be conducted to induct staff and third parties about the issue of Sexual harassment at the workplace, the Supreme Court guidelines and *Vishakha* judgment as well as about the organizational policy on sexual harassment at the work place.

Definition:

Sexual Harassment in the work place is defined as including "unwelcome" sexually determined behavior (whether directly or by implication) as:

- Physical contact and advances;
- Demand or request for sexual favours;
- Sexually coloured remarks;
- Showing pornography; and
- Other unwelcome physical, verbal or non-verbal conduct of a sexual nature

Sexual Harassment Redressal Committee (SHRC):

The following are the members of the NeoGrowth Sexual Harassment Redressal Committee:

| Sr.no | Name | Designation | Membership type | Mobile No | Email ID |
|-------|---|-------------|--|------------|--|
| 1 | Ms. Gauri Shah | Chairperson | Central | 9860640005 | gauri.shah@neogrowth.in |
| 2 | Ms. Poorvi Shah NGO Representative, (CEO, Katalyst) | Member | Central | 9930453283 | poorvi@katalystindia.org |
| 3 | Ms. Suprabha Mishra | Member | Central | 7021995256 | suprabha.mishra@neogrowth.in |
| 4 | Mr. Pramod Bhandari | Member | Central | 7738082992 | pramod.bhandari@khaitan.in |
| 5 | Office Representative | Member | Local: Representative from each office as per the list below | | |

**SEXUAL HARASSMENT
REDRESSAL POLICY**

Given below are the Office wise representatives for the Sexual Harassment Redressal Committee:

| Sr.no | NeoGrowth Offices | SHRC Representative |
|--------------|------------------------------|--|
| 1 | Peninsula Business Park (HO) | Senior VP – Corporate Affairs and HR |
| 2 | Andheri | VP – Credit |
| 3 | Borivali | Team leader/Branch Senior |
| 4 | Vashi | Team leader/Branch Senior |
| 5 | Thane | Team leader/Branch Senior |
| 6 | Pune | Regional Sales Manager/Branch Senior |
| 7 | Nagpur | City/Cluster Manager – Sales/Branch Senior |
| 8 | Nashik | City/Cluster Manager – Sales/Branch Senior |
| 9 | Delhi | National Sales Head/Branch Senior |
| 10 | Chandigarh | Regional/Cluster Sales Manager/Branch Senior |
| 11 | Ludhiana | City/Cluster Manager – Sales/Branch Senior |
| 12 | Indore | City/Cluster Manager – Sales/Branch Senior |
| 13 | Jaipur | City/Cluster Manager – Sales/Branch Senior |
| 14 | Lucknow | City/Cluster Manager – Sales/Branch Senior |
| 15 | Kolkata | Regional Sales Manager/Branch Senior |
| 16 | Bhubaneshwar | City/Cluster Manager – Sales/Branch Senior |
| 17 | Jamshedpur | City/Cluster Manager – Sales/Branch Senior |
| 18 | Bangalore Sales | Circle Business Head/Branch Senior |
| 19 | Bangalore - Tech | SVP – Engineering and Technology |
| 20 | Mysore | City/Cluster Manager – Sales/Branch Senior |
| 21 | Chennai | Regional Sales Manager/Branch Senior |
| 22 | Coimbatore | City/Cluster Manager – Sales/Branch Senior |
| 23 | Madurai | City/Cluster Manager – Sales/Branch Senior |
| 24 | Hyderabad | Zonal Sales Manager/Branch Senior |
| 25 | Vijayawada | City/Cluster Manager – Sales/Branch Senior |
| 26 | Visakhapatnam | City/Cluster Manager – Sales/Branch Senior |
| 27 | Ahmedabad | Zonal Sales Manager/Branch Senior |
| 28 | Baroda | City/Cluster Manager – Sales/Branch Senior |
| 29 | Surat | City/Cluster Manager – Sales/Branch Senior |
| 30 | Rajkot | City/Cluster Manager – Sales/Branch Senior |

Functions of the Central SHR Committee

1. To inquire into written complaints of Sexual Harassment at workplace as received and give its report for action to be initiated against the harasser.
2. To prepare an annual report of the committee.
3. To spread awareness of the SHR policy and arrange training sessions on the policy.
4. To take preventive action wherever required so that the incidents may not occur.
5. To provide assistance to the victim in cases of third-party harassment and criminal complaints.
6. To provide counselling and other support services to the victims whenever required.
7. To ensure non-victimization of the victim or the complainant.

Functions of the Office representative of SHR Committee at the respective office represented by the member

1. To represent SHRC for the office he/she belongs to
2. To work closely with and help Central SHRC members in inquiry into written complaints of Sexual Harassment at workplace for cases at the respective office represented by the member
3. To contribute to spreading awareness of the SHR policy
4. To take preventive action wherever required so that the incidents may not occur

Sexual Harassment Redressal Committee: The key features are as enlisted below:

(a) Facilitating body

The Committee will work in coordination with the Management and will ensure regularity of meetings and follow-up of cases of sexual harassment that may arise. This body will also ensure preventive action to be taken to avoid sexual harassment at the work place.

(b) Members

There are four Central members to the committee. The fifth member is a representative from each of the respective office of NeoGrowth.

(c) Women's representation

To ensure the SHRC always has a Female majority, three out of four Central members would be females. Moreover, the Chairperson of the Sexual Harassment Redressal Committee would always be a female.

(d) Selection of members

Members are selected based on their commitment and sensitivity to the issue. They must be gender sensitive and compassionate individuals. They must be non-judgmental and tactful in their approach of handling such cases.

(e) Period of membership

Membership is normally for a period of two years, after which new set of members will be appointed. However, few members if willing can continue their membership to help evolve and guide the new members. The current committee is appointed till **31st January 2023**, though a replacement would be taken suitably as and when any of the Committee member exits the company.

(f) Termination of membership

Membership will be terminated in the event of separation of a member from the organization, or if a member has been found guilty in a case of sexual harassment. Membership will also be transferred to another person after the completion of two years tenure.

(g) Appointment of new members

New members will be appointed by the management. An individual who has been previously elected as a member on the committee can be elected again. An orientation for the new members would be taken up by the existing Central members OR by the Compliance Training representatives of the HR team.

(h) Meetings

Meetings will be held once every calendar quarter, whether or not a case of sexual harassment has been registered. This is to discuss and plan for preventive actions and to make recommendations to the facilitating body. The venue and the time for the meetings will be as per the decision of the members of the committee. Such meetings need to be minute and reported every quarter.

(i) Decision/Recommendation

In case of differences of opinion, the decision/recommendation of the majority of the committee members will prevail.

Procedure for Redressal

Every employee prior to initiating a formal inquiry under this policy is encouraged to bring it to the notice of the harasser concerned that this behavior is not welcome and try to resolve any grievance directly with the persons concerned and if required with the assistance or support of the Office/Local SHRC Representative, who in turn is required to do preliminary investigation. In case it cannot be resolved, or the behavior persists, a written complaint is required to be given to:

- a. Any member(s) of the Central SHR Committee or
- b. Immediate Superior
- c. Immediate Reviewer
- d. Senior members of Human Resources team
- e. Confidential e-mail ID (shr@neogrowth.in)

As soon as SHR Committee receives a complaint in writing, after preliminary investigation and if there is a sexual harassment issue, it will initiate its inquiry of the complaint within a period of one week. This Committee will be a deemed Inquiry Committee. This Committee will examine witnesses, documents and follow the principles of natural justice in arriving at a conclusion and will hand over its report with the recommended action to the disciplinary authority i.e. Mr. Piyush Khaitan (Managing Director) & Mr. Vijay Mahajan within a period of 10 days from the date of completion of the enquiry and such report shall be made available to the concerned party.

The disciplinary authority will act upon the recommendation within 60 days of its receipt.

If the Inquiry Committee cannot complete its inquiry within a period of one month it will have to give reasons in writing for the delay.

If the complaint amounts to offence under the Indian Penal Code, then the company can assist the victim in initiating criminal action.

Confidentiality

The Company encourages an environment in which individuals are not afraid to discuss concerns and make complaints. The Company will endeavor to maintain complete confidentiality, unless otherwise required by law. Relevant information will be provided only to those persons who need to know in order to achieve a timely resolution of the complaint. The Committee members also will maintain confidentiality. In case of breach of confidentiality, action may be initiated against the member for misconduct as per Company's rules.

Non-reprisal

Every employee who has taken action in good faith to seek advice concerning a sexual harassment complaint or is a witness or is a Committee member in the investigation of a sexual harassment complaint, will be protected against any reprisal, interference, coercion, discrimination or threat. The Committee will ensure that the victim or the complainant or witnesses are not victimized because they are pursuing the complaint.

Malicious, False Accusations

A complainant whose allegations are found to be both false and brought with malicious intent will be subject to disciplinary action which may include, but is not limited to, written warning, demotion, transfer, suspension, or dismissal.

Disciplinary Actions: The following are the disciplinary action that the Committee can recommend to the Disciplinary Authority.

1. Apology
2. Verbal Warning
3. Written warning
4. Suspension
5. Withholding increments
6. Demotion
7. Fine
8. Transfer
9. Termination
10. Dismissal
11. Or any other action that the Committee may deem fit.

If the victim wants to be transferred to another department/location as a result of the incident, the organization shall assist in the transfer. The perpetrator may also be transferred, if the organization deems fit to do so.

Action by the Disciplinary Authority

Disciplinary authority is different from inquiry authority. Disciplinary authority will be Mr. Piyush Khaitan (MD) and Advisor - HR and they will be responsible for taking action on the recommendations of committee.

On receipt of the report of the Inquiry Committee by the disciplinary authority i.e. Mr. Piyush Khaitan (MD) and Advisor- HR will take action on recommendations of the Inquiry Committee within a period of 60 days. If the disciplinary authority does not follow the recommendations of the Inquiry Committee, it will have to give reasons in writing. Disciplinary authority is required to send the annual report to the concerned Ministry as per the SC judgement

Third Party Harassment: Where sexual harassment occurs as a result of an act by any third party or outsider example a client, the Committee will assist to provide protection to the victim and take the necessary preventive action.

Awareness Creation and Training: The Committee with support from Compliance Training Representatives of the HR will regularly arrange trainings/workshops for creating awareness on Sexual Harassment Redressal Policy of the company amongst its employees and members which shall be at least once a year for all and as part of induction training for all new joiners.

Report: The Committee will document the complaints received and record the proceedings and submit an annual report to Managing Director and HR Advisor.

Review of the Policy:

The Policy is subject to periodic review in consultation with the Managing Director, HR Advisor and Committee Members with subsequent changes made whenever required. The guidelines under this policy will not prejudice or prevent any victim from taking recourse to any law of the land.

The policy may be amended modified or supplemented from time to time.

Self-Undertaking by the employee:

I have read the SHR Policy and understood its contents. I also undertake to abide by all the provisions of this policy and any violation of this policy by me will lead to appropriate disciplinary action including my termination.

Name of the Employee:

Signature:

Designation:

Location:

Date: