

KREON FINNANCIAL SERVICES LIMITED

POLICY FOR PREVENTION OF SEXUAL HARASSMENT (POSH)

1. PURPOSE:

The Company has framed a Policy for prevention of Sexual Harassment at workplace and reviewed and adopted the same w.e.f 30.06.2020. Purpose of this policy is to frame a secure workplace devoid of sexual harassment & prejudice for all its employees. As per the guidelines of "The Sexual harassment of women at workplace (prevention, prohibition & redressal) Act, 2013".

2. SCOPE:

Sexual Harassment or prejudice caused by any employee during their tenure with Kreon Financial Services Limited (KFSL) is a punishable offence. KFSL would follow zero tolerance against any kind of sexual harassment or prejudice meted towards any other person being an employee of KFSL, Client, Vendor and Contractor in Company premises or elsewhere in India or abroad

3. APPLICABILITY:

This policy applies to all employees (permanent, temporary, trainees, contracted or retainership basis) of KFSL at Nungambakkam and Puraswalkkam locations.

4. DEFINITION:

Sexual Harassment – Harassment of a Female/Male employee consisting of any unwelcome sexually determined behavior, irrespective of whether directly, indirectly, by any person in charge of the management or a person's co-employee either individually or in association with other persons to exploit the sexuality of co-employee to harass him/her in manner which prevents or impairs his/her full utilization of full benefits, facilities or opportunities or any other behavior which is generally considered to be derogatory .

"Sexual Harassment" includes any one or more of the following uninvited acts or behavior (whether directly or by implication), but not limited to:

1. Any uninvited sexually determined behavior, or pattern of conduct, that would cause embarrassment and/or humiliate a person at whom the behavior or conduct was directed namely:
 - a. A sort of Uninvited sexual advances involving verbal, non-verbal, or physical conduct, implicit or explicit
 - b. Physical contact and advances including (but not limited to) touching, stalking, sounds which have explicit and /or implicit sexual connotation/overtone, molestation

- c. Teasing, Nonsense, intimations and taunts with implicit sexual connotation, physical confinement
- d. Demand or request for sexual favors
- e. Sexually colored remarks or remarks of a sexual nature about a person's attire or physique

- f. Display of pictures, signs, signals etc. with sexual nature/ connotation/ overtones in the work area and work-related areas
- g. Showing pornography, making or posting vulgar / indecent / sexual pranks, teasing, jokes, demeaning or offensive pictures, cartoons or other materials through email, SMS, MMS, gestures etc.
- h. Pestering to socialize during off-duty hours or continued expressions of sexual interest
- i. Giving gifts or leaving objects that are sexually suggestive
- j. Eve teasing, intimations and taunts, physical confinement against one's will or any such act likely to intrude upon one's privacy; Persistent watching, following, contacting of a person; and
- k. Any uninvited conduct of sexual nature, be it physical, verbal or non-verbal.

2. The following circumstances if it occurs or is present in relation to any sexually determined act or behavior amounts to sexual harassment:

- a. Implied or explicit promise of preferential treatment in employment;
- b. Implied or explicit threat of detrimental treatment in employment;
- c. Implied or explicit threat about the present or future employment status;
- d. Interference with the person's work or creating an intimidating or offensive or hostile work
- e. Humiliating treatment likely to affect health or safety.

Any alleged act of sexual harassment committed during or outside of office hours falls under the purview of this policy. Further, it is important to note that whether harassment has occurred or not does not depend on the intention of the person/ people but on the experience of the Women.

Employee of KFSL – Includes a person who is hired by KFSL, as Permanent, Temporary, Contracted or on Retainership Basis, part-time basis etc either directly or indirectly or through vendor organization.

Aggrieved Women - In relation to a workplace, a woman, of any age, whether employed or not, who alleges to have been subjected to any act of sexual harassment by the respondent.

Respondent: Employees against whom the complaint has been filed.

Complainant: Any aggrieved woman who makes a complaint claiming sexual harassment under this policy

Workplace:

Premises, locations, establishments, enterprises, institutions, offices, branches or units established, subsidiaries which are controlled by the Company.

Places visited by the Employee arising out of or during the course of employment including official events, accommodation and transportation provided by the employer for undertaking a journey.

KEY RESPONSIBILITIES OF THE INTERNAL COMPLAINTS COMMITTEE AGAINST SEXUAL HARASSMENT (ICCSH)

The ICCSH is responsible for: To effectively address workplace sexual harassment complaints, a Complaints Committees must first be aware of their key responsibilities, some of which are highlighted below:

1. Be thoroughly prepared
2. Know the Act, Policy and/or relevant Service Rules
3. Gather and record all relevant information
4. Determine the main issues in the complaint
5. Prepare relevant interview questions
6. Conduct necessary interviews
7. Ensure parties are made aware of the process and their rights/responsibilities within it
8. Analyse information gathered
9. Prepare the report with findings/recommendations

GRIEVANCE MECHANISM: PROCEDURE TO REGISTER COMPLAINTS:

Within 3 months of an occurrence of an act of sexual harassment, a complaint in written has to be shall be submitted in to **hr@stucred.com** or to any member of the Internal Committee. If the respondent is direct supervisor of the complainant, or person influencing the career growth of the complainant, the reporting structure will be changed till the time the enquiry is completed.

INTERNAL COMMITTEE:

The Company has instituted an Internal Complaints Committee for redressal of sexual harassment complaint (made by the victim) and for ensuring time bound treatment of such complaints.

a. In accordance with the sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, each complaint of Sexual Harassment shall be dealt with utmost confidentiality and urgency by an Internal Complaints Committee comprising of the following members:

I. Sr Lead - HR – Pradepkumar S

II. Cofounder& Director - Jaijash Tatia | jaijash@stucred.com

III. Director - Henna Tatia | henna@stucred.com

IV. Chief Financial Officer – Shoba Nahar | shoba@stucered.com

b. The Internal committee would commence an Official Internal Enquiry within three working days:

- I. By informing the said complaint to the respondent.
- II. By instructing to stop the alleged act of Sexual Harassment immediately
- III. By informing not to reach out to the complainant directly or indirectly
- IV. By asking an immediate explanation from him/her to the same

c. Within 15 days upon receiving the original complaint, the Internal committee shall record and accordingly communicate in writing to the complainant and the Respondent, its prima facie findings, by giving the concerned parties a fair and due opportunity to represent themselves. The internal committee also makes sure that the victims or witnesses are not victimized, while dealing with the complaints of sexual harassment. To elaborate; the internal committee will conduct necessary meetings with the respondent and the complainant and the proofs to prove the existence of such complaint will be collected by the Internal Committee

d. A complaint will be locked no later than one month from receipt of original complaint by recording the decisions of the internal committee, accordingly informing to the complainant and the Respondent of the same.

e. An investigation requires the whole-hearted participation of the employees as they are bound to abide by the decisions taken by the internal committee. Whistleblowers shall be protected from exposure, retaliation or hostility.

f. If the complainant or the respondent is dissatisfied with the decisions taken by the internal committee, they shall appeal in writing to the Managing director within a couple of working days from receipt of prima facie findings or the charges, within 5 working days from the receipt, the appeal shall be finally disposed of by written communication to the said party. The decision of Managing Director shall be final and cannot be appealed.

Contents of the complaint

The written complaint should contain a description of each incident(s). It should include relevant dates, timings and locations; name of the respondent(s) and the working relationship between the parties. A person designated to manage the workplace sexual harassment complaint is required to provide assistance in writing of the complaint if the complainant seeks it for any reason.

REDRESSAL:

1. An amicable resolution of the complaint is possible only with the written consent of the complainant.

2.The Managing Director shall be informed about the decision taken by the internal committee, within 24 hours of closing the case file.

3.In case of decision establishing the offence of Sexual Harassment of the complainant, within 3 working days, the internal committee shall recommend Disciplinary action against the offender considering the nature and extent of injury caused to the complainant, prior complaints or repetition of offence etc. and the impact of the offence on the company profile as a whole.

4. The position of the offender and the criticality of the position occupied by the offender shall not be any hindrance to the disciplinary action taken against the offender.

5. The disciplinary action that shall be commensurate with the nature of the gravity of the offence, shall include but not limited to,

- Warning
- Written apology from offender,
- Bond of good behavior
- Transfer
- Debarring from supervisory duties
- Denial of employee benefits like increments/promotion/salary correction etc.
- Cancellation of specific work Assignment
- Suspension
- Dismissal
- Penal Consequences of Sexual Harassment
 - If In any case the Committee finds 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 employer, to file a Police Complaint. Under the Indian Penal Code, (IPC), the newly introduced Section (S. 354A) deals with Sexual Harassment which has made this a 'cognizable offense' i.e. a person charged with Sexual Harassment may be arrested without a warrant.

PUNISHMENT FOR FALSE OR MALICIOUS COMPLAINT AND FALSE EVIDENCE:

Where the Internal Complaints Committee arrives at a conclusion that the allegation against the respondent is malicious or the aggrieved woman or any other person making the

complaint has made the complaint knowing it to be false or the aggrieved woman or any other person making the complaint has produced any forged or misleading document, it may recommend to the employer to take action in accordance with the provisions of the service rules applicable to her or him.

CONFIDENTIALITY:

The Company understands that it is difficult for the victim to come forward with a complaint of sexual harassment and recognizes the victim's interest in keeping the matter confidential. To protect the interests of the victim, the accused person and others who may report incidents of sexual harassment, confidentiality will be maintained throughout any investigatory process by all involved to the extent practicable and appropriate under the circumstances.

ACCESS TO REPORTS AND DOCUMENTS:

Annual report summarizing complaints and Redressal of Sexual harassment shall be prepared by designated person. The said report as well as all records of complaints and other documents regarding Sexual Harassment complaints shall be in the custody of the designated person and will be termed as 'Strictly Confidential'.

CONCLUSION:

In conclusion, the Company reiterates its commitment to providing its women employees, a workplace free from harassment/ discrimination and where every employee is treated with dignity and respect.