

Prevention of Sexual Harassment (POSH) & Internal Complaints Committee (ICC)

POLICY FOR RESPECT AT WORK

- **Prevention (Prohibition and Redressal) Of Sexual Harassment at the Workplace Act, 2013**



OBJECTIVES:

- **Tell**, “whom” and “where ”this Policy is applicable
- **Explain**, what sexual harassment means
- **List**, what includes sexual harassment
- **Describe**, the process to follow in case of any sexual harassment
- **Sensitize** – completely confidential to be maintained



WHOM IS IT APPLICABLE TO?

- All persons employed (Women or Man) by Fino at a workplace for any work on regular, temporary, consultant directly or through an agency
- Third parties and/or visitors at all business units or functions of Fino, its subsidiaries and/or its affiliated or group companies .

WHERE IS IT applicable?

- The Policy covers complaints of sexual harassment in all the workplaces
- Any such conduct involving employees outside the workplaces including but not limited to ,office vehicles, business trips, offsite, training programmes ,social events etc.



SEXUAL HARASSMENT INCLUDES FOLLOWING UNWELCOME BEHAVIOURS:

- Physical Contacts & advances
- A demand or request for sexual favour
- Making sexually coloured remarks
- Showing pornography
- Any other unwelcome physical, verbal or non verbal conduct
- All the above is applicable even through digital media or VC's



INSTANCES LEADING TO SEXUAL HARASSMENT

A. Verbal

1. Narrating sexual stories or questions about a person's sexual experiences or preferences
2. Sexual Jokes
3. Inappropriate commenting on a person's body and/or appearances
4. Asking for Dates
5. Making suggestive sounds or whistling
6. Calling someone by names such as honey, doll ,babe etc.

B. Non- Verbal

1. Staring at a person
2. Following or blocking a person
3. Showing sexually explicit pictures, cartoons or other visuals
4. making suggestive gestures
5. Sending unwarranted notes or other materials
6. Giving unwarranted personal gifts
7. Exposure

C. Physical

1. Touching a Person
2. Leaning over a person
3. Standing or sitting too close to a person
4. Brushing up against a person
5. Kissing
6. Pinching
7. Actual / Attempted Rape



IF YOU ARE HARASSED:

- Aggrieved individual (Complainant/Victim) should ask the respondent (Harasser/accused) to stop the unwelcome behaviour
- Aggrieved individual (Complainant/Victim) should keep a record of such incidents
- Aggrieved individual (Complainant/Victim) should file a written complaint with the ICC



INTERNAL COMPLAINTS COMMITTEE (ICC)

- All the complaints ,made by the aggrieved Individual (Complainant/Victim) under the ambit of this Policy shall be dealt with by the ICC
- **The ICC shall be treated as an independent committee** .For administrative convenience, the ICC shall route the communication to the Management through Fino – Head of Human Resources(HR)
- The ICC is vested with the same powers as that of a civil court under the Code of Civil Procedure ,1908 for the purpose of making enquiry ,summoning and enforcing attendance and production of required documents.
- **No person against whom a complaint is made shall be a part of ICC** .In case the aggrieved woman's (Complainant/Victim)complaint is against an ICC Member ,such Member will not participate in any stage of review or inquiry in to such complaint.
- **The ICC shall be headed by a female Presiding Officer** ,at least half of its members will be women and will also have a NGO Member (Legal Expert)as Third Party Expert ,amongst its members.

FINO“INTERNAL COMPLAINTS COMMITTEE (ICC)”

Sr.No	Committee Members
1	Chitra Upadhyay
2	Manish Kolge
3	Nikita Mukesh Mehta
4	Suvarna Ravindra Sapange
5	Manindra Gupta
6	Rakesh Kumar Tiwari

- Sexual harassment issues at the workplace should be intimated at gnp_support@finopaytech.com
- This e mail ID is controlled only by the ICC Members
- All information received on this e mail ID will be kept strictly confidential

FILING A COMPLAINT

A. WHO

1. An aggrieved woman(Complainant/Victim)
2. In case ,she is unable to file a complaint, the same may be filed by any person, with her written consent ,who has knowledge of the incident

B. WHEN

1. Within a period of 3 months from the date of incident or in case of a series of incidents, within 3 months from the date of last incident.
2. This period may be extended for further 3 months if the ICC is satisfied with the circumstances that prevented the aggrieved woman(Complainant/Victim) to file a complaint within the said period.

C. HOW

1. Submit the complaint in writing or via an e mail to the ICC along with supporting documents including the names/addresses of the witnesses
2. The complaint can be filed before the Presiding Officer or any other ICC Member or by sending it to gnp_support@finopaytech.com
3. Anonymous complaints will not be entertained by the ICC



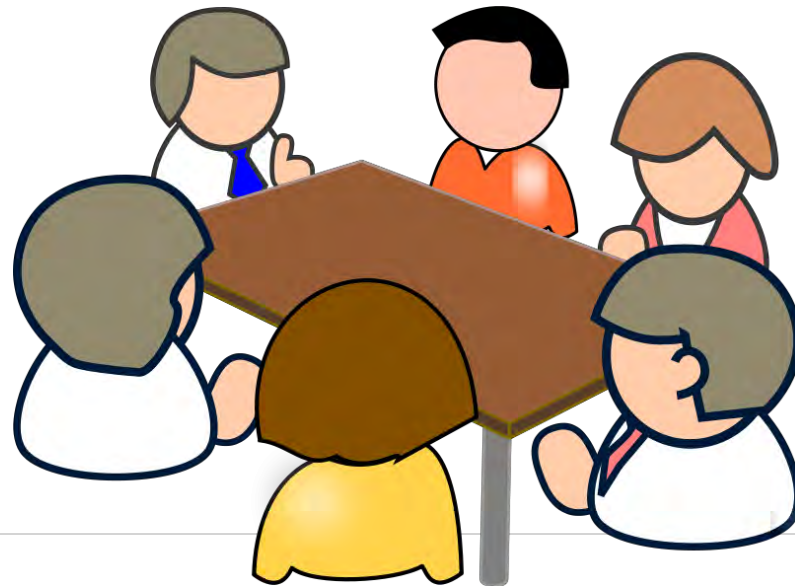
DEALING WITH THE COMPLAINT

- Report sexual harassment directly on the gnp_support@finopaytech.com only
- Do not discuss it with any other colleagues or team members
- It will be kept completely confidential
- Respondent (Harasser/Accused) will be informed about the complaint
- ICC shall ensure immediate investigation
- Aggrieved individual (Complainant/Victim) and the respondent (Harasser/Accused) shall be questioned separately.
- Aggrieved individual (Complainant/Victim) and the respondent (Harasser/Accused) shall be informed of the outcome of the investigation



CONCILIATION BY THE ICC

- Before initiating an inquiry, the ICC may at the request of the aggrieved individual (Complainant/Victim), takes steps to settle the matter between her/him and the respondent (Harasser/Accused) through conciliation, which will be recorded in presence of both the parties
- In case ,the terms of settlement are not complied with, ICC will proceed to conduct the inquiry in to the complaint



DISCIPLINARY ACTION AGAINST THE GUILTY

- On conclusion of the inquiry, if the allegations against the respondent (Harasser/Accused) are proved , any of the following disciplinary actions will be taken:
 - Written Warning /Reprimand /Censure
 - Asking for Written Apology
 - Withholding Pay Rise, Increment and/or Promotion
 - Termination from service
 - Recovery of Monetary Compensation

MALICIOUS COMPLAINT:

- If on inquiry ,it is proved that the allegations against the respondent (Harasser/Accused) is malicious or the aggrieved individual (Complainant/Victim) has filed a false/malicious complaint or the aggrieved individual (Complainant/Victim) or any other person has produced any forged or misleading documents, ICC may recommend strict disciplinary action against aggrieved individual (Complainant/Victim) or such person.

TIMELINESS :

- On receipt of the complaint, post a preliminary review, the ICC shall forward one copy of the complaint to the respondent (Harasser/Accused) for his response, to be submitted within 10 working days.
- The inquiry has to be completed within 90 days.
- The Company will have to take action on the recommendations by the ICC within 60 days.

