

PPFAS ASSET MANAGEMENT PRIVATE LIMITED

Policy on Prevention of Sexual Harassment at Workplace.

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1. Objective

PPFAS Asset Management Private Limited provides equal opportunities to all its employees to develop professionally and contribute towards the growth of the organisation. It has a zero tolerance policy towards sexual harassment which hampers employee productivity, mental health and thereby damaging the reputation of the company.

PPFAS Asset Management Private Limited has a gender neutral policy on sexual harassment. The policy has been created to redress the grievance of both female and male employees. A complaint received from any employee will be handled based on the principles of natural justice protecting the rights of the individual.

2. Regulations Governing the Policy

The Prevention of Sexual Harassment Policy complies with the following Regulations:-

- Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (“the Act”)
- Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Rules, 2013

3. Definitions

a. “Company” means PPFAS Asset Management Private Limited.

b. “Employee” means any person employed by PPFAS Asset Management Private Limited for any work on permanent, regular, temporary, ad hoc or daily wage basis, either directly or through an agent, including trainees and employees during probation.

c. “Sexual Harassment” includes any one or more of the following unwelcome acts or behaviour (whether directly or by implication) namely :-

- i. physical contact and advances; or
- ii. a demand or request for sexual favours; or
- iii. making sexually coloured remarks; or
- iv. showing pornography; or
- v. any other unwelcome physical, verbal or non-verbal conduct of sexual nature; or

Following circumstances, among other circumstances, if it occurs or is present in relation to or connected with any act or behaviour of sexual harassment may amount to sexual harassment:-

- i. implied or explicit promise of preferential treatment in her employment; or
- ii. implied or explicit threat of detrimental treatment in her employment; or
- iii. implied or explicit about her present or future employment status; or
- iv. interference with her work or creating an intimidating or offensive or hostile work environment for her; or
- v. humiliating treatment likely to affect her health or safety.

4. Composition of Internal Complaints Committee

The Internal Complaints Committee is constituted as per the provisions of the Act for handling and redressal of complaints received from employees of the Company. The investigation shall be carried out by the Committee.

The Internal Complaints Committee consists of the following members:-

- (a) Ms. Neeta Shukla- Presiding Officer
- (b) Ms. Bhavya Shah - Member
- (c) Ms. Mansi Vyas - Member
- (d) Mr. Uttam Shetty- Member

The Presiding Officer and every Member of the Internal Complaints Committee shall hold office for such period, not exceeding three years, from the date of their nomination as may be specified by the Company.

5. **Complaint Redressal Mechanism**

Any aggrieved person may make, in writing, a complaint of sexual harassment to the Internal Complaints Committee within a period of three months from the date of the incident and in case of a series of incidents, within a period of three months from the date of last incident.

The Presiding Officer or any member of the Internal Committee shall render all assistance to the person for making the complaint in writing where such complaints cannot be made in writing. The Internal Committee shall extend the time limit not exceeding three months, if it is satisfied that the circumstances were such which prevented the person from filing a complaint within the said period for reasons to be recorded in writing.

(I) Where the aggrieved person is unable to make a complaint on account of his/her physical incapacity, a complaint may be filed by -

- (a) a relative or friend; or
- (b) co-worker; or
- (c) an officer of the National Commission for Women or State Women's Commission; or
- (d) any person who has knowledge of the incident, with the written consent of the aggrieved person;

(II) Where the aggrieved person is unable to make a complaint on account of his/her mental incapacity, a complaint may be filed by -

- (a) a relative or friend; or
- (b) a special educator; or
- (c) a qualified psychiatrist or psychologist; or
- (d) the guardian or authority under whose care he/she is receiving treatment or care; or
- (e) any person who has knowledge of incident jointly with his/her relative or friend or a special educator or a qualified psychiatrist or psychologist; or guardian or authority under whose care he/she is receiving treatment or care.

The complaint should be made to the Internal Complaints Committee in the following e-mail id:-
(bhavya@ppfas.com / mansi@ppfas.com)

On receipt of complaint, the Internal Complaints Committee shall send one of the copies received from the aggrieved person to the respondent.

The respondent shall file his reply to the Committee within a period of 10 working days.

The Internal Complaints Committee shall make inquiry into the complaint in accordance with the principles of natural justice.

The Internal Complaints Committee shall have the right to terminate the inquiry proceedings or to give an ex parte decision on the complaint, if the complainant or respondent fails to present himself or herself without sufficient cause. However such termination or ex-parte order shall be passed after giving a notice of 15 days in advance, in writing, to the party concerned.

The parties 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.

In conducting the inquiry, a minimum of three Members of the Internal Complaints Committee including the Presiding Officer shall be present.

6. Conciliation

The Internal Complaints Committee may before initiating an inquiry at the request of the aggrieved person take steps to settle the matter between him/her and the respondent through conciliation provided that no monetary settlement shall be made basis of conciliation.

Where a settlement has been arrived at, the Internal Complaints Committee shall record the settlement so arrived at and forward the same to the Company.

The Internal Complaints Committee shall provide the copies of the settlement recorded to the aggrieved person and the respondent.

Where settlement has been arrived at, no further inquiry shall be conducted by the Internal Complaints Committee.

7. False and Malicious Complaints

Any false or malicious complaint against the respondent by the complainant will be dealt seriously.

If the Internal Complaints Committee arrives at a conclusion that the allegation against the respondent is malicious or the person making the complaint has made it knowing it to be false or a forged or misleading document has been submitted by the complainant, it may recommend the Company to take any action it may deem fit including termination of service.

A mere inability to substantiate a complaint or provide adequate proof need not attract action against the complainant. The malicious intent on part of the complainant shall be established after an inquiry before any action is recommended. Employees should bear in mind that the Company does not intend to discourage complaints about sexual harassment and understands that some allegations may be difficult to prove, thus, any final decision taken will be on the basis of thorough investigation of facts.

8. Miscellaneous

The Internal Complaints Committee shall prepare an annual report and submit the same to the Company and the District Officer, in each annual year which shall have the following details:-

- (a) number of complaints of sexual harassment received during the year;
- (b) number of complaints disposed off during the year;
- (c) number of cases pending for more than ninety days;
- (d) number of workshops or awareness programme against sexual harassment carried out;
- (e) number of action taken by the employer or District Officer.
