

# **POLICY ON PREVENTION OF SEXUAL HARASSMENT AT WORKPLACE**

## **1.0 INTRODUCTION**

**Nalin Lease Finance Limited (NLFL)** is committed to establishing a safe and respectful working environment that ensures freedom from prejudice, gender bias, and sexual harassment for all employees. The company acknowledges the right of every employee to be treated with dignity. In alignment with the Sexual Harassment of Women at Workplace (Prevention, Prohibition, and Redressal) Act, 2013, as well as directives from the Supreme Court, NLFL has developed this Policy for the Prevention of Sexual Harassment at the Workplace, applicable to all employees with immediate effect.

## **OBJECTIVE**

The primary objective of this policy is to provide a workplace devoid of harassment and discrimination, specifically for women employees, promoting a culture of dignity and respect. The policy aims to prevent any form of sexual harassment within or outside the workplace, to educate employees about the gravity of such actions, and to underscore their legal consequences.

## **2.0 SCOPE AND EFFECTIVE DATE**

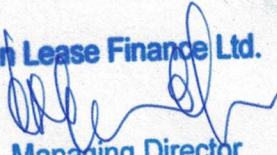
This policy extends to all categories of employees at NLFL, including permanent, management, workmen, temporary, trainees, apprentices, and contract employees, whether on NLFL premises or at client sites. The policy's provisions are an integral part of the terms of employment for all employees and take effect immediately.

Sexual harassment encompasses various unwelcome actions or behaviours, such as physical advances, explicit or implicit requests for sexual favours linked to employment or benefits, sexually suggestive remarks, jokes, gestures, physical contact, molestation, stalking, display of explicit content, eve teasing and any conduct creating a hostile environment. The policy applies personal responsibility on all employees to ensure compliance and foster a harassment-free environment.

## **3.0 COMPLAINT REDRESSAL COMMITTEE**

A dedicated Committee has been constituted by the Management to address and resolve complaints related to sexual harassment. The Committee members are as follows:

1. Mr. Dilipkumar N. Gandhi- Chairman
2. Mr. Harsh D. Gandhi- Member
3. Mrs. Pallavi D. Gandhi- Member

For, Nalin Lease Finance Ltd.  
  
Managing Director





A quorum of at least 3 members, including the Chairperson and at least one lady member, is required for conducting proceedings.

#### **4.0 REDRESSAL PROCESS**

##### **A. Informal Resolution Options**

In instances of sexual harassment, victims are encouraged to directly communicate their disapproval and concerns to the harasser. If such informal resolution is ineffective or uncomfortable, victims can escalate the matter to the Complaints Committee. The Committee will promptly investigate to facilitate resolution.

##### **B. Formal Complaints**

Employees uncomfortable with informal resolution or having exhausted such options can file a formal complaint with the Chairperson of the Internal Complaints Committee. The complainant must submit a written complaint along with supporting documents and witnesses' details within 15 days of the alleged incident. Complaints can also be submitted via email, ensuring necessary identification.

The Complaint Committee will ensure that the accused receives a copy of the complaint within 7 working days and allow the accused to respond within 10 working days.

The Inquiry shall involve a minimum of 2 Committee members, and legal representation is not allowed. A written report containing findings and recommendations will be submitted to the Managing Director within 10 days of inquiry completion.

#### **MANNER OF TAKING ACTION AGAINST THE RESPONDENT**

If the Complaint Committee determines the allegation is valid, recommended actions may include written apologies, warnings, reprimands, withholding promotions or pay rises, transfers, counselling, or even termination.

#### **PUNISHMENT FOR FALSE OR MALICIOUS COMPLAINT AND FALSE EVIDENCE**

If the Committee finds a complaint to be false or malicious, appropriate action will be taken according to the applicable service rules.

#### **CONFIDENTIALITY**

To safeguard victims' interests, confidentiality will be maintained during the investigatory process, respecting privacy while addressing the issue.

For, Nalin Lease Finance Ltd.

Managing Director






## **GENERAL**

NLFL's management commits to facilitating the effective implementation of this policy. Third-party harassment will be addressed with supportive measures. The Committee will report on complaints annually, and if warranted, legal action may be taken.

### **Approved by**

Dilipkumar N. Gandhi -Managing Director on: 25.05.2013

For, Nalin Lease Finance Ltd.  
  
Managing Director

