

## **NATIONAL TRUST HOUSING FINANCE LIMITED**

### **Policy for Prevention and Prohibition of Sexual Harassment of women at workplace**

#### **Introduction**

The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 is a legislative act in India that seeks to protect women from Sexual Harassment at their place of work.

NATRUST's quest for competitive excellence consists of our commitment to lawful and ethical conduct and adhering to NATRUST's values. Integrity, honesty and respect for people remain some of our core values.

#### **Objective**

The Company is committed to provide a safe and conducive work environment to its employees and expects them to combine "Expertise with responsibility". Under the corporate compliance, harassment of any kind including sexual harassment is forbidden.

To meet this objective, measures shall be taken to avoid, eliminate and if necessary impose punishment for any act of sexual harassment, which includes unwelcome sexually determined behavior. Sexual Harassment is a criminal offence and punishable under relevant laws of the Country.

#### **Policy**

This policy applies to all NATRUST employees and employees on Contract. As a policy it applies to all locations, situations where NATRUST's business is conducted.

"Sexual Harassment" includes any unwanted or unwarranted gesture or verbal sexual advances, sexually explicit and derogatory statements or remarks, sexually coloured remarks, avoidable and unwarranted physical contacts, willfully touching or patting, suggestive sexual remarks, sexually slanted and obscene jokes, vulgar comments about physical appearance, indecent invitations, use of pornographic material, demand for sexual favors, demanding sexual favor by making telephone calls or sending SMS/Mails, threats of physical assault or molestation on refusal by the employee by their superiors, colleagues or anyone who for the time being is in a position to sexually exploit or harass the employee at any work place which may contain:

- Implied or overt promise of preferential treatment in that employee's employment.
- An implied or overt threat of detrimental treatment in that employee's employment or an implied or overt threat about the present or future employment status of that employee and includes the creation of a hostile working environment.

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- The conduct interferes with an employee's work or creates an intimidating, hostile or offensive work environment.
- Such conduct that is humiliating and may constitute a health and safety problem

This policy on Sexual Harassment applies to men and women; to like and opposite gender relationships; to relationships between supervisors and subordinates; and peer relationships.

#### Complaint Mechanism

An appropriate complaint mechanism in the form of “**Internal Complaints Committee**” has been created in the Company for time-bound redressal of the complaint made by the victim.

#### Internal Complaints Committee

The “Internal Complaints Committee” shall consist of a Chairperson, Secretary and 3 other members.

Sl. No.	Designation	Name of the member
1	Chairperson	Mrs.Latha Paul
2	Secretary	Ms.V.Jayashree
3	Member	Mr.M.A.Qadir
4	Member	Mr.S.Balaji
5	Member	Ms.G.Revathy (M/s.Motilal & Goda)

The Complaints Committee is responsible for:

- Investigating every formal written complaint of sexual harassment
- A member of the Internal Complaint Committee would then hold an investigation and give a report to the Internal Complaint Committee.

The Committee, before initiating the inquiry at the request of the aggrieved woman, will take steps to settle the matter between her and the respondent through mutual settlement. Wherever such settlement has been arrived, the Internal Committee shall record it and send the same to the Managing Director to take action as per recommendation.

Once such settlement has been arrived at no further enquiry shall be conducted by the Internal Complaint Committee. However, a woman can further refer the same to Internal Complaint Committee for redressal if the terms of settlement have not been complied.

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In case of no such settlement is arrived, the Committee shall initiate formal investigation. At the end of the investigation, the Secretary of the Committee shall prepare a report of findings on the complaint and submit it to the Chairperson of the Committee. The findings of the report should be made available to the respondent and aggrieved woman within 10 working days from the date of completion of enquiry.

The Chairperson of the Committee shall ensure that the complaint is attended to within 10 working days after receiving it and that the investigations are completed within 30 working days.

Pursuant to a finding of Sexual Harassment by the Committee against any person accused of the same, the Committee may initiate any one or more of the following actions:

- Actions in accordance with misconduct mentioned in service rules / appointment letter
- Issue a verbal warning
- Issue a warning in writing
- Issue a suspension
- Deprived of increment or promotion
- To deduct, notwithstanding anything in the service rules applicable, from the salary or wages of the accused person the such sum as it may consider appropriate to be paid to the aggrieved woman
- Order dismissal depending upon the severity & sensitivity of the incident  
Financial Penalty (In accordance with the mental, physical trauma, loss of career opportunity, medical expenses) in lump sum or in instalments.

#### **Confidentiality**

All information received shall be kept confidential. Any person (including witnesses) who breaches confidentiality shall be subject to disciplinary action.

#### **Protection against retaliation**

Regardless of the outcome of the complaint made in good faith, the employee lodging the complaint and any person providing information or any witness, will be protected from any form of retaliation. While dealing with complaints of sexual harassment, the Committee shall ensure that the Complainant or the witness are not victimized or discriminated against by the accused. Any unwarranted pressures, retaliatory or any other type of unethical behaviour from the accused against the complainant while the investigation is in progress should be reported by the complainant to the Complaints Committee as soon as possible. Disciplinary action will be taken by the Complaints Committee against any such complaints which are found genuine.

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#### **Documentation**

The Committee shall keep complete and accurate documentation of the complaint, its investigation and the resolution thereof.

#### **Complaints made with a malicious intent**

This policy has been evolved as a tool to ensure that in the interest of justice and fair play, our employees have a forum to approach in the event of instances of sexual harassment. However, if on investigation it is revealed that the complaint was made with a malicious intent and with the motive of maligning the concerned individual / tarnishing his/her image in the company and to settle personal/professional scores, strict action will be taken against the complainant. The employees who are victims of sexual harassment may, in addition to the above, seek legal remedies as may be provided under the various laws for the time being in force.