

PRODIGEE FINANCE LIMITED

Updated as on 01.04.2022

PREVENTION OF SEXUAL HARASSMENT



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POLICY DREAM IT | ACHIEVE IT



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1. Objective

Prodigee Finance Limited is committed to create and maintain a secure work environment where it's Employees, Agents, Vendors and Partners can work and pursue business together in an atmosphere free of harassment, exploitation and intimidation caused by acts of Sexual Harassment within but not limited to the office premises and other locations directly related to the Company's business.

The objective of this policy is to provide protection against sexual harassment of women at workplace and for the prevention and redressal of complaints of sexual harassment and for matters connected therewith.

All concerned should take cognizance of the fact that Prodigee Finance Limited strongly opposes sexual harassment, and that such behavior against women is prohibited by the law as set down in The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and Rules framed there under being the "The Sexual Harassment of Women at Workplace" (hereinafter referred to as "Act") as well as the terms of employment. Commission of any act of sexual harassment as defined in the Act and in this Policy shall result in strict disciplinary action.

At Prodigee Finance Limited, we have zero-tolerance for sexual harassment. We value each employee working with us and wish to protect their dignity and self-respect. In doing so, we are determined to promote a working environment in which people of both genders complement each other as equals in an environment that encourages maximum productivity and to keep the personal dignity.

We at Prodigee Finance Limited are committed towards giving every employee a just and fair hearing on issues encountered by them at the workplace with special attention to sexual harassment. Prodigee Finance Limited will take very serious disciplinary action against any victimization of the employee who is complaining or the alleged harasser that may result from a complaint.

2. SCOPE

This policy applies to all categories of employees of the Company including permanent management and workmen, temporaries, trainees and employees on contract at its workplace. The Company will not tolerate sexual harassment.

The workplace includes:

- All offices or other premises where the Company's business is conducted.
- All company-related activities will be performed at any other site away from the Company's premises.
- Any social, business or other functions where the conduct or comments may have an adverse impact on the workplace or workplace relations.

Sexual harassment is judged by the impact on the complainant and not the intent of the

Respondent. Sexual harassment as addressed in this Policy need not necessarily be from a male to a female employee, it can be vice versa as well as between individuals of same gender.

3. DEFINITION OF SEXUAL HARASSMENT

Sexual Harassment” includes any one or more of the following unwelcome acts or behavior (whether directly or by implication):

- Physical contact and advances.
- Demand or request for sexual favors.
- Sexually colored remarks or remarks of a sexual nature about a person's clothing or body
- Showing pornography, making or posting sexual pranks, sexual teasing, sexual jokes, sexually demeaning or offensive pictures, cartoons or other materials through email, SMS, MMS etc.
- Repeatedly asking to socialize during off-duty hours or continued expressions of sexual interest against a person’s wishes.
- Giving gifts or leaving objects that are sexually suggestive.
- Eve teasing, innuendos 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 ix. Any other unwelcome physical, verbal or non-verbal conduct of sexual nature
- Implied or explicit promise of preferential treatment in her employment: or
- Implied or explicit threat of detrimental treatment in her employment; o
- Implied or explicit threat about her present or future employment status: or
- Interference with her work or creating an intimidating or offensive or hostile work environment for her.
- Humiliating treatment is likely to affect her health or safety.
- Demand or request for sexual favors.
- Any other type of sexually oriented conduct;

4. APPLICABILITY

This policy is applicable to all complaints of sexual harassment or discrimination at work made by and against employees of Company, as well as other vendors, trainees, probationers, temporary and contractual staff. This policy covers not only harassment in the workplace, but also any conduct involving employees outside the workplace including office cab, business trips, off site training programs, social events, etc.

5. RESPONSIBILITIES REGARDING SEXUAL HARASSMENT

All employees of the Company have a personal responsibility to ensure that their behavior is not contrary to this policy. All employees are encouraged to reinforce the maintenance of a work environment free from sexual harassment.

6. COMPLAINT MECHANISM

Whether or not such conduct constitutes an offence under law or a breach of the service rules, an appropriate complaint mechanism in the form of “Complaints Committee” has been created in the Company for time-bound redressal of the complaint made by the victim.

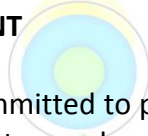
7. COMPLAINTS COMMITTEE

The Company has instituted a Complaints Committee known as Internal Complaints Committee for redressal of sexual harassment complaint (made by the victim) or suo moto by the Company to prevent harassment and anti-discrimination harassment and to otherwise implement the policy and for ensuring time bound treatment of such complaints.

The Complaints Committee is responsible for:

- Investigating every formal written complaint of sexual harassment.
- Taking appropriate remedial measures to respond to any substantiated allegations of sexual harassment.
- Discouraging and preventing employment-related sexual harassment.

8. PROCEDURES FOR RESOLUTION, SETTLEMENT OR PROSECUTION OF ACTS OF SEXUAL HARASSMENT



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The Company is committed to providing a supportive environment in which to resolve concerns of sexual harassment as under:

Informal Resolution Options:

When an incident of sexual harassment occurs, the victim of such conduct can communicate her disapproval and objections immediately to the harasser and request the harasser to behave decently. If the harassment does not stop or if the victim is not comfortable with addressing the harasser directly, victim can bring their concern to the attention of the Complaints Committee for redressal of grievances. The Complaints Committee will thereafter provide advice or extend support as requested and will undertake prompt investigation to resolve the matter.

Complaints:

Any employee with a harassment concern, who is not comfortable with the informal resolution options or has exhausted such options, may make a formal complaint to the Chairperson of the Complaints Committee constituted by the Management. The complaint shall have to be in writing and can be in the form of a letter, preferably within 15 days from the date of occurrence of the alleged incident, sent in a sealed envelope. Alternately, the employee can send a complaint through an email. The employee is required to disclose her name, department, division and location she is working in, to enable the Chairperson to contact her and take the matter forward.

The Chairperson of the Complaints Committee will proceed to determine whether the

allegations (assuming them to be true only for the purpose of this determination) made in the complaint fall under the purview of Sexual Harassment preferably within 30 days from receipt of the complaint. In the event, the allegation does not fall under the purview of Sexual Harassment, or the allegation does not mean an offence of Sexual Harassment, chairperson will record this finding with reasons and communicate the same to the complainant.

If the Chairperson of the Complaint Committee determines that the allegations constitute an act of sexual harassment, she will proceed to investigate the allegation with the assistance of the Complaints Committee.

Where such conduct on the part of the accused amounts to a specific offence under the law, the Company shall initiate appropriate action in accordance with the law by making a complaint with the appropriate authority.

The Complaints Committee shall conduct such investigations in a timely manner and shall submit a written report containing the findings and recommendations to the Whole Time Director as soon as practically possible and in any case, not later than 90 days from the date of receipt of the complaint. The whole-time director will ensure corrective action on the recommendations of the Complaints Committee and keep the complainant informed of the same.

Corrective action may include any of the following:

- 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,

In case the complaint is found to be false, the Complainant shall, if deemed fit, be liable for appropriate disciplinary action by the Management.

Inquiry Procedure

All proceedings of the inquiry are documented. The Committee interviews the respondent separately and impartially. The committee states exactly what the allegation is and who has made the allegation. The respondent is given full opportunity to respond and provide any evidence etc. Detailed notes of the meetings are prepared which may be shared with the respondent and complainant upon request. Any witnesses produced by the respondent are also interviewed & statements are taken.

If the complainant or respondent desires to cross examine any witnesses, the Committee facilitates the same and records the statements. In case a complainant or respondent seeks to

ask questions to the other party, they may give them to the Committee which asks them and records the statement of the other party.

Any such inquiry is completed, including the submission of the Inquiry Report, within 90 days of the date on which the inquiry is commenced. The inquiry procedure ensures absolute fairness to all parties.

9. 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 to the extent practicable and appropriate under the circumstances.

10. ACCESS TO REPORTS AND DOCUMENTS

All records of complaints, including contents of meetings, results of investigations and other relevant material will be kept confidential by the Company except where disclosure is required under disciplinary or other remedial processes.

11. PROTECTION TO COMPLAINANT/VICTIM

The Company is committed to ensure that no employee who brings forward a harassment concern is subject to any form of reprisal. Any reprisal will be subject to disciplinary action.

The Company will ensure that victim or witnesses are not victimized or discriminated against while dealing with complaints of sexual harassment.

However, anyone who abuses the procedure (for example, by maliciously putting an allegation knowing it to be untrue) will be subject to disciplinary action.

12. MALICIOUS ALLEGATIONS

Where the committee arrives at the 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 act against the woman or the person making the complaint.

The action recommended should be like the ones proposed for the offender. While deciding malicious intent, the committee should consider that mere inability to substantiate a complaint need not mean malicious intent. Malicious intent must be clearly established through a separate inquiry.

13. CONCLUSION

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.

Approved by the Board of Directors vide Resolution dated 1stApril, 2022



Amit Goel
Managing Director
Prodigee Finance Limited

Date: 01.04.2022

Place: Bhopal



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