

POLICY ON PREVENTION OF SEXUAL HARASSMENT FOR WOMAN AT WORKPLACE

INTRODUCTION

This policy is framed in accordance with the provisions of "The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013" and its associated rules (hereinafter referred to as "the Act"). While the policy covers all key aspects of the Act, for any further clarification, the Act shall take precedence. If any aspect related to sexual harassment is not explicitly covered by this policy but is addressed by the law, then the law will apply. In case of any conflict between the policy and the law, the law will prevail. This policy provides protection against sexual harassment of women at the workplace and ensures the prevention and redressal of complaints related to it.

All employees are expected to uphold the highest standards of ethical conduct in the workplace and in all their interactions with business stakeholders. This entails a responsibility to:

- i. Treat each other with dignity and respect.
- ii. Adhere to both the letter and spirit of the law.
- iii. Avoid any behavior with sexual connotations that is unwelcome.
- iv. Prevent the creation of a hostile work environment through sexual harassment.
- v. Report any incidents of sexual harassment experienced or witnessed to the appropriate authorities and follow the company's complaint handling procedure.

SCOPE

The Policy intends to ensure that no woman Employee is subjected to sexual harassment and it is applicable to all Employees of Savani Financials Limited. Where Sexual Harassment occurs against any female Employee as a result of an act by a third party or outsider while on official duty, Savani Financials Limited will take all necessary and reasonable steps as per the applicable rules and regulations, to initiate action at the workplace of the third party or outsider. This Policy shall be applicable to any allegation of Sexual Harassment at Savani Financials Limited premises including any place visited by an Employee arising out of or during employment and/or transportation provided by Savani Financials Limited ("Workplace").

DEFINITIONS

- i. **“Act”** means “The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013” and any amendment thereto.
- ii. **“Aggrieved Woman”** means any female Employee of Company or any woman who alleges to have been subjected to any act of Sexual Harassment at the Workplace.
- iii. **“Internal Complaints Committee”** means a committee by that name, constituted by the Board of Company as per the provisions of the Act.
- iv. **“Respondent”** means the person against whom the allegation of Sexual Harassment has been made by the Aggrieved Woman.
- v. **“Sexual Harassment”** includes any one or more of the following unwelcome acts or behaviors (whether directly or by implication) namely:
 - a) physical contact and advances; or
 - b) demand or request for sexual favors; or
 - c) making sexually colored remarks; or
 - d) showing pornography; or
 - e) any other unwelcome physical, verbal or non-verbal conduct of sexual nature

INTERNAL COMPLAINTS COMMITTEE

A Committee must be formed to consider and redress complaints of Sexual Harassment.

The Committee shall consist of four person and include:

A Chairperson who shall be woman employed at a senior level in the organization,

Two other members from amongst the employees, committed to the cause of women or who have had experience of social work or have legal knowledge; and

The external member from amongst non-governmental organizations or associations committed to the cause of women or a person familiar with the issues relating to sexual harassment.

PREVENTION OF SEXUAL HARASSMENT REDRESSAL PROCESS

Any Aggrieved Woman who feels being sexually harassed directly or indirectly may submit a complaint of the alleged incident to any member of the Committee within 10 days of occurrence of incident. Complaint on phone will not be entertained. Anonymous letters will not be entertained. The Company shall protect the identity of the complainant, if it is so desired by the complainant.

The Complainant may also submit any corroborative material with a documentary proof etc., to substantiate his / her complaint. If the Complainant does not wish to depose personally before the committee due to embarrassment of narration of an event, then the complainant may depose before any member of the committee in person. The Committee will hold a meeting with the Complainant within five days of the receipt of the complaint, but not later than a week in any case, and record his / her allegations. If required, witnesses may be called in this regard.

Thereafter, the person against whom the complaint is made may be called for a deposition before the Committee and an opportunity will be given to him / her to give an explanation.

Further enquiry as deemed necessary may be conducted by the committee and decisions taken.

In case the complaint is found to be true, appropriate action shall be taken against the offender.

In the event, the complaint does not fall under the purview of Sexual Harassment, or the complaint does not mean an offence of Sexual Harassment, the same would be dropped after recording the reasons thereof.

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

CONFIDENTIALITY AND NON-RETALIATION

Every person who is a part of the complaint process shall at all times keep the contents of complaint, identity of complainant, respondent and witnesses, and any information relating to conciliation, inquiry and recommendations of Committee confidential. Savani does not tolerate retaliation or victimization against anybody who identifies and raises issues relating to any form of harassment/discrimination including sexual harassment or who lodges complaints and/or participates in any related proceedings either directly with the management or through the grievance procedures in place. Any person contravening the confidentiality clauses is subject to disciplinary action as prescribed under the Act / Code protocols.