



SAHARA HOUSINGFINA CORPORATION LIMITED
(CIN:L18100WB1991PLC099782)

Prevention and Redressal of Sexual Harassment Policy

POSH Policy



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1. PURPOSE

Provide a safe and conducive work environment to its employees in which the dealing should be full of fairness and of respect, and free from sexual harassment & discrimination for all its employees, as per the guidelines of "The Sexual harassment of women at workplace (prevention, prohibition & redressed) Act, 2013.

2. SCOPE

Sahara Housingfina Corporation Limited hereinafter referred as "**SHCL**" aims to build safe environment against any kind of Sexual Harassment or discrimination caused by any employee during their tenure in SHCL towards any other person being an employee of SHCL.

3. APPLICABILITY

All employees (including employees on retainership and contractual basis) of SHCL at all locations and all customers, suppliers and contractors/vendors of SHCL.

- ✓ The complainant as well as the respondent may be a man or a woman
- ✓ The complainant needn't be of the opposite sex
- ✓ The complainant does not have to be the person harassed but could be anyone affected by the offensive conduct.
- ✓ It may occur at work place or any other place where the employee is engaged in work related activities.
- ✓ It may occur with SHCL employees deputed to external visit.

4. DEFINITION

a) **Sexual Harassment** - Any behavior (physical, verbal, written, graphic, electronic, emotional, psychological or through gestures that offend), whether intentional or not, which offends the dignity of the person towards whom the behavior is directed by fellow employee(s), supervisor(s), customer(s) or supplier(s) will be considered as sexual harassment and shall invite serious disciplinary action. Sexual Harassment shall include but not limit to;

- Physical Contact & Sexual advances
- Demand or request for sexual favour
- Sexually- colored remarks



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- Showing pornography
- Any other unwelcome physical, verbal or non-verbal or written conduct of a sexual nature
- Staring or leering
- Unnecessary familiarity, such as deliberately brushing up against you or unwelcome touching
- Suggestive comments or jokes
- Insults or taunts of a sexual nature
- Intrusive questions or statements about your private life
- Displaying posters, magazines or screen savers of a sexual nature
- Sending sexually explicit emails or text messages
- Inappropriate advances on social networking sites
- Accessing sexually explicit internet sites
- Requests for sex or repeated unwanted requests to go out on dates
- Behavior that may also be considered to be an offence under criminal law, such as physical assault, indecent exposure, sexual assault, stalking or obscene communications
- Behavior that is based on mutual attraction, friendship and respect is not sexual harassment.

b) **Aggrieved/Complainant** - In relation to workplace, an employee of any age whether employed or not, who alleges to have been subjected to any act of sexual harassment by the Respondent.

c) **Respondent** - Employees against whom the complaint has been filed.

5. GRIEVANCE MECHANISM

A complaint shall be submitted in writing to any member of the **Internal Committee** mentioned herein within 3 months of occurrence of any act of Sexual Harassment. If the respondent is direct supervisor of the complainant, or person influencing the career growth of the complainant, the reporting structure will be changed till the time the enquiry is completed.

6. INTERNAL COMPLAINT COMMITTEE (ICC)

Objectives:

The objectives of the **Internal Complaint Committee (ICC)** to Prevent Sexual Harassment at the Workplace are as follows;

- To ensure the implementation of the policy in letter and spirit through proper



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- reporting of the complaints and their follow-up procedures.
- To uphold the commitment of the Institute to provide an environment free of gender-based discrimination.
 - To create a secure physical and social environment to deter any act of sexual harassment.
 - To promote a social and psychological environment to raise awareness on sexual harassment in its various forms.

Structure:

- **Annexure-I** of this policy document provides for constituent members of the ICC. At least one of the members must be women
- ICC must have an external member as mandated by law.

7. REDRESSAL PROCESS AND MECHANISM

- i. The complaint can be made by the aggrieved himself/herself or any other person such as relative, friend, guardian or co-worker who has the knowledge of the incident, with the written con-sent of the aggrieved/complainant.
- ii. Complaints can be made in person/via phone/email/letter, to any of the committee members. Any oral communication should be followed up with a written communication.
- iii. If the complaint has been made to the superior, he/she must immediately communicate the de- tails to the committee members and also explain the committee of any action taken, failing which the superior will be liable for penalty action.
- iv. If the respondent is direct supervisor of the complainant, or person influencing the career growth of the complainant, the reporting structure will be changed till the time the enquiry is completed.
- v. Within 3 working days, the Internal committee shall commence Official Internal Enquiry by;
 - a. By informing the said complaint to the respondent.
 - b. By instructing to stop the alleged act of Sexual Harassment immediately



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- c. By informing not to reach out to the complainant directly or indirectly
- d. By asking an immediate explanation from him/her to the same

- vi. Within 5 working days from the receipt of original complaint, the designated person shall respond in writing to the complainant informing him/her about the initial steps taken by SHCL in order to stop the alleged act(s).

- vii. Employees are duty bound to assist in investigative steps, employees' wholehearted participation shall be mandatory in this regard. Whistle blowers shall be protected from exposure,retaliation or hostility.

- viii. Within 15 days from receipt of the original complaint, the ICC record and accordingly communicate in writing to the complainant and the Respondent, its prima facie findings, upon giving the concerned parties a fair and due opportunity to represent themselves and upon conducting fact finding, truth verification and counselling sessions with persons involved in alleged act(s).

- ix. A complaint will be closed no later than one month from receipt of original complaint by re- cording the decisions of the ICC, accordingly informing to the complainant and the Respondent of the same.

- x. Within 2 working days from receipt of prima facie findings or the charges, if the complainant or the Respondent is dissatisfied with the decision of ICC, she or he may appeal specifying the reasons in writing to the Board of Director. Within 5 working days from the receipt, the appeal shall be finally disposed of by written communication to the said party.

The decision of Board of Directors shall be final and cannot be appealed.

8. REDRESSAL GUIDELINES

- i. An amicable resolution of the complaint is possible only with the written consent of the complainant.

- ii. Within 24 hours of closing the case file, the ICC shall present the same to and inform its decision to the Board of Directors.



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- iii. The position of the offender and the criticality of the position occupied by the offender shall not be any hindrance to the disciplinary action taken against the offender.
- iv. The disciplinary action against the offender would be based on the nature and extent of injury caused to the complainant, prior complaints or repetition of offence etc. and the impact of the offence on the company profile as a whole. It shall include but not limited to;
 - 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
- v. Annual report summarizing complaints and Redressed of Sexual harassment shall be prepared by designated person. The said report as well as all documents regarding Sexual Harassment complaints shall be in the custody of designated person and will be termed as "Strictly Confidential".

9. MALICIOUS ALLEGATIONS

Where the committee arrives at the conclusion that the allegation against the respondent is malicious or the aggrieved or any other person making the complaint has made the complaint knowing it to be false or the aggrieved or any other person making the complaint has produced any forged or misleading document, it may recommend to the employer to take action against the complainant or the person making the complaint.

The action recommended should be similar to the ones proposed for the respondent in case of substantiated complaints. 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.



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10. CONFIDENTIALITY

- i. Individuals involved in the complaints process/system should refrain from divulging;
 - Details/contents of complaint
 - Any information gathered in the course of the inquiry
 - Identities of the persons involved in the case.
 - Any information relating to conciliation and inquiry proceedings
- ii. Any breach of confidentiality will be taken seriously and the implications of which shall be disciplinary actions as per the rules of the SHCL.
- iii. Key witnesses or other stakeholders may be required to be taken into confidence at the strict discretion of the Internal Committee.

ANNEXURE-I

CONSTITUENT MEMBERS OF ICC

Email address- info.saharahousingfina@gmail.com

Sl.	Position	Name
1.	Presiding Officer	Ms. Sudha Sarowgi, Director
2.	Member	Shri D J Bagchi, CEO
3.	Member	Shri Vivek Kapoor, CFO
4.	Member	Shri Sumi Basu, CCO
5.	Member	Ms. Enasree Sreemany Malakar

Note:

- If complaint is against Presiding Officer, then any one of other Member of ICC will act as Presiding Officer for that particular case.
- If complaint is against any other members of the ICC then Board of Directors will constitute a fresh committee for that particular case.

Approved in Board Meeting: 29-May-2026