

UNIGOLD FINANCE LIMITED

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

INTRODUCTION:

Unigold Finance Limited (UGFL/the Company) is an equal employment opportunities employer Company and is committed in creating a healthy working environment that enables employees to work without fear of prejudice, gender bias and sexual harassment. The Company also believes that all employees of the Company have the right to be treated with dignity. Sexual harassment at any workplace is a grave offence and is, therefore, punishable under relevant Laws of the country. All workplaces under the auspices and control of Unigold Finance Limited are zero tolerance zones for sexual harassment and gender-based discrimination. This is the Company's Policy on Prevention of Sexual Harassment at Workplace ("POSH Policy" or "Policy")

OBJECTIVE:

- i. To promote a healthy and congenial work environment without prejudice on gender, color, caste, creed or social class of the employees.
- ii. To educate the employees on what constitutes sexual harassment, the ways and means which the Company is adopting to prevent occurrence of any such event and in the unlikely chance of such an occurrence, to enable a fair mechanism for dealing with such conduct.
- iii. To promote a culture that has zero-tolerance for any verbal, written, virtual or physical conduct of a sexual nature by any employee that harasses, disrupts, or interferes with another's work performance or that creates an intimidating offensive, or hostile environment.
- iv. It is the duty of the management and all responsible persons representing the management to prevent sexual harassment in the workplace and to provide a mechanism for resolution of such complaints. Likewise, to create a culture free of sexual harassment and gender discrimination is also an aim that all employees of the Company must ensure. To meet these objectives, measures shall be taken to create awareness about the law and the Company Policy on Sexual Harassment, to provide a redressal mechanism and to impose punishment for any act of sexual harassment when proved.

APPLICABILITY:

- i. This Policy extends to all employees of the company - permanent, temporary, contract employees and trainees.
- ii. It applies to every alleged act(s) of sexual harassment, whether the incident has occurred during or beyond duty hours.
- iii. It applies to every alleged act(s) of sexual harassment, whether sexual harassment has taken place within or outside the office premises.

- iv. It is not applicable when both the alleged harasser and the victim are third parties.
- v. This Policy is in compliance with the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act 2013 (hereinafter referred to as "the Act" or "the Law"), the rules made thereunder and all subsequent amendments of the Act.

DEFINITIONS:

A : SEXUAL HARASSMENT

"Sexual Harassment" is, any unwelcome behavior (direct or implied) of a sexual nature, such as physical contact and advances, unwelcome communication or invitations, demand or request for sexual favors: whether verbal, textual graphic, and electronic or by any other actions or any other physical, verbal, non-verbal conduct of a sexual or lewd nature. Harassment may be subtle, manipulative and not always evident. It includes behavior that is not welcome and is personally offensive. Offenders can be in any grade/ level and covers non-employees such as customers/ clients.

Sexual harassment would include any of the following:

- i. Unwelcome sexual advances, requests, or demand for sexual favors, either directly or implicitly
- ii. Unwelcome sexual advances involving verbal, non-verbal, or physical conduct such as sexually colored remarks, jokes, letters, phone calls, e-mail, gestures, showing of pornography, lurid stares, physical contact or molestation, stalking, sounds, display of pictures, signs, verbal or non-verbal communication which offends the individual's sensibilities and affect her/his performance.
- iii. Eve teasing, innuendos and taunts, physical confinement against one's will and likely to intrude upon one's privacy.
- iv. Any acts of a sexual or inappropriate nature which results in a hostile work environment or discrimination or denial of service progression or benefits.
- v. Any obscene gesture by an employee having sexual overtones.
- vi. Misuse of official position or powers to solicit sexual favors.
- vii. Any other unwelcome physical, verbal, or non-verbal conduct of sexual nature.

It is very important to also note that if any of the abovementioned activities are accompanied by or demanded or requested in return for employment, promotion,

appraisal, continuation of employment, examination or evaluation of a person towards any company activity, it shall amount to “Quid Pro Quo” sexual harassment. It falls under the definition of Sexual Harassment as provided in the Act and shall be dealt with in similar manner by the IC.

B WORKPLACE

“Workplace”: In addition to the registered office and other offices of the Company, it shall also include any place where the Complainant or the Respondent visits in connection with his/her work, during the course of and/or arising out of employment/ engagement with the Company including transportation provided for undertaking such a journey. It shall also include travel arrangements as provided by the Company, Office events, conferences, parties and any other gathering or occasion where requires the employee to be present, as officially communicated. Workplace also includes digital workplaces such as virtual meeting rooms, call bridges and facilities and any other form of virtual workplace.

C AGGRIEVED WOMAN

In relation to a workplace, a woman, of any age, whether employed or not, who makes a complaint/alleges to have been subjected to any act of sexual harassment by the respondent and includes employees, contractual and temporary employees, casual labourers, consultants, interns, freelancers, customers, clients and visitors.

D COMPLAINANT

A person who files a complaint of sexual harassment against any person. It includes any Aggrieved Woman, as well as any employee of the Company of male or any other gender who wishes to make a complaint of Sexual Harassment.

Being an equal opportunities employer, the Company under this Policy hereby empowers not only Aggrieved Women but also any employee of any gender to make a complaint of sexual harassment if they face sexual harassment during the course of their employment.

E RESPONDENT

A person, whether employed or not, against whom a complaint of Sexual Harassment has been made by the Complainant.

The above-mentioned list is not exhaustive and merely indicative in nature. If you have any further questions on the acts that would constitute as sexual harassment, please feel free to reach out to the HR Head or any member of the Internal Committee.

OUR RESPONSIBILITIES:

Responsibilities of Individual:

It is the responsibility of all to respect the rights and privacy of others and to never encourage or tolerate Sexual Harassment. It can be done by:

- a. Refusing to participate in any activity which constitutes Sexual harassment
- b. Supporting the victim of Sexual Harassment to reject unwelcome behaviour
- c. Acting as a witness if the person being harassed decides to lodge a complaint
- d. Fostering an atmosphere free from any kind of discrimination and hostility and encouraging gender equality in workplace.
- e. Advising and communicating to others regarding behaviour that is unwelcome. At times, some behaviour is not intentional. While this does not make it acceptable, one may opt to give to the person behaving inappropriately, the opportunity to modify or stop their offensive behaviour.

This organisation empowers its employees to report any and all cases of sexual harassment, whether they are victims themselves or have been witness to such instances.

Responsibilities of Managers:

The managers and leaders are the ones who set the path for the team to follow. All managers must ensure that nobody is subject to sexual harassment and there is no gender discrimination within their respective departments. They must also ensure that all employees understand that harassment will not be tolerated; that complaints will be taken seriously; and that the Complainant and Witnesses are not victimized in any ways.

REGISTERING A COMPLAINT OF SEXUAL HARASSMENT:

Any Aggrieved Woman who believes or she is being sexually harassed, or any employee who becomes aware of sexual harassment of a woman, should send an Email to posh@unigoldfinance.com which can be accessed by the Internal Committee of the Company, also known as IC.

A complaint of Sexual Harassment made by the Aggrieved Woman to the IC is required to be in writing and duly signed. The following details are to be provided in the complaint - :

- Name & Address of the Complainant
- Employee ID (If the Complainant is an Employee.)
- Contact Number
- Department (If the Complainant is an Employee.)
- Name of the Respondent (person against whom a complaint is made)
Employee ID (If the Respondent is an Employee.)

- Contact Number (If available)

- Department (If the Respondent is an Employee.)

The Aggrieved Woman must also provide the details of the incident.

In the event the Aggrieved Woman is unable to make a complaint in writing or provide the above mentioned information in detail, she can approach the IC or the Presiding Officer who shall then assist her in writing down the requisite details pertaining to the complaint.

The IC shall follow due process of law (as laid down in the Act) as well as principles of natural justice once it receives a Complaint of sexual harassment including but not limited to notifying the Respondent in writing within 10 (ten) days about the receipt of complaint against him/her/them and providing them a copy of the complaint received from the Complainant.

To address complaints of sexual harassment from Complainants of other genders (male and transgender) the Company has constituted a Disciplinary Authority. The Disciplinary Authority has been instituted by the Board of Directors of the Company (Board) to implement a gender diverse anti-sexual harassment policy. A complaint by a Complainant of other than female genders shall be made in the same manner as is stated in the sub-section above.

All complaints of sexual harassment, whether made before the IC or the Disciplinary Authority will be treated strict confidentiality and will be duly investigated and acted upon.

UNIGOLD PREVENTION OF SEXUAL HARASSMENT COMMITTEES:

a. Unigold Internal Committee (IC) is as follows

The details of the Committee Members is as follows:

Sr. No	Name of the Member	Designation	Mobile Number	Email Id
1	Alaka Nayak (Presiding Officer)	Manager	8763502621	Alaka.nayak@unigoldfinance.com
2	Santoshi Harichandan	Branch Manager	9861944637	Santoshi.harichandan@unigoldfinance.com
3	Deepanwita Panda	Assistant Manager	9438300419	deepanwita.panda@unigoldfinance.com
4	Mohit Parida	HR – Manager	8328888201	Mohit.parida@unigoldfinance.com
5	Rubinabi Himmatsaheb Inamdar	External Member – NGO	7038872279	rubina.gendersense@gmail.com

b. Unigold Disciplinary Authority to determine complaints of Sexual Harassment from Complaints of other Gender (Disciplinary Authority)

Sr. No	Name	Mobile Number	Email ID
1	Mr. N. P Sarangi	9437555220	Np.sarangi@unigoldfinance.com
2	Mr. Amit Roy	8100021564	Amit.roy@unigoldfinance.com
3	Ms. Alaka Nayak	8763502621	Alaka.nayak@unigoldfinance.com
4	Ms. Vinita Rathod	9769694062	Cs.vinita@unigoldfinance.com

WORK FROM HOME GUIDELINES:

This policy also protects all employees as well as any female consultants, vendors, clients, customers and any other third parties related by business while are working from home. It is required that all employees of the Company always follow and ensure decorum and professional conduct even while they are working remotely. In the event any employee or above-mentioned female third party related by business finds herself/himself facing any untoward behaviour or any instance of Sexual Harassment (as defined under the policy), they are entitled to initiate a complaint of Sexual Harassment with the IC via email.

GENERAL CONDITIONS:

All False and Mala-fide reporting of Sexual Harassment shall be penalised. Any person found filing or instigating another to file a false and malicious complaint of sexual harassment shall be penalised in the same manner if the complaint was found to be true. Giving of false evidence or testimony shall also be subject to penalty. The policy actively seeks to protect the victims of sexual harassment and prevent sexual harassment within its auspices but is strictly against misuse of the law by any individual for personal gains or vendetta.

A complaint, that merely fails to be proved, shall not constitute as a false and malicious complaint.

In the event, the complaint does not fall under the purview of Sexual Harassment, such a complaint shall be redirected to the relevant authority being Board or committee.

The policy also prohibits retaliation against any employee who brings a complaint of sexual harassment or who assists with the investigation or resolution of sexual harassment.

- * Complainants or witnesses will not be victimized or discriminated against while dealing with complaints.
- * Should any dispute or doubt arise as to the interpretation of these rules. It should be forwarded to Corporate and the decision of the management shall be final.
- * As a part of the policy, the aggrieved employee will be given counselling to help them cope with the mental trauma arising out of the harassment.
- * Committee shall analyze and put up report on all complaints of this nature at the end of the every year for submission to Managing Director.

- * Any changes to this policy shall be placed before the Board for its approval and subsequently upon approval shall be suitably communicated to all the employees. The policy and changes thereto shall always be in compliance with the Act.

CONFIDENTIALITY AND PROHIBITION OF PUBLICATION:

The contents of the complaint, identity and addresses of the Complainant, Respondent, and witnesses, any information relating to conciliation and inquiry proceedings, recommendations of the committee and the action taken by the company are not to be published, communicated or made known to the public, press and media in any manner. The company shall be entitled to take appropriate action or impose penalty on the concerned individuals for any publication, communication and disclosure of the aforesaid data and information.

However, information may be disseminated regarding the justice administered to any aggrieved employee without disclosing the name, address, identity or any other particulars which may lead to identification of the aggrieved employee and witness.

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 or under applicable laws.

STATUTORY COMPLIANCE:

The above policy is aimed at complying with the Sexual Harassment of Women at workplace (Prevention, Prohibition and Redressal) Act 2013 read with the Sexual Harassment of Women at workplace (Prevention, Prohibition and Redressal) Rules 2013, as well as the disciplinary policies/ grievance redressal mechanisms of the company.

The company reiterates its commitment to provide its employees a workplace free from harassment/ discrimination and where every employee is treated with dignity and respect.

PREVENTIVE ACTION:

The Company always undertakes steps to ensure prevention of sexual harassment at work which may include circulating applicable policies, conducting trainings and awareness sessions and sharing other relevant information to all employees including to all new joiners.

EFFECTIVE DATE:

This policy comes into effect immediately.