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## MENTOR HOME LOANS INDIA LTD.

### POLICY ON PREVENTION, PROHIBITION AND REDRESSAL OF SEXUAL HARASSMENT AT WORKPLACE

<b>Revision History:</b>	
<b>Effective From</b>	<b>18<sup>th</sup> July, 2016</b>
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**MENTOR HOME LOANS INDIA LTD.**

MENTOR HOUSE, GOVIND MARG, SETHI COLONY,  
JAIPUR, RAJASTHAN – 302004, Tel : 0141 – 2611999,  
8946800800 Email:- [info@mentorloans.co.in](mailto:info@mentorloans.co.in),  
Website: [www.mentorloans.co.in](http://www.mentorloans.co.in)



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## **POLICY ON PREVENTION, PROHIBITION AND REDRESSAL OF SEXUAL HARASSMENT AT WORKPLACE**

### **1. COMMITMENT**

Mentor Home Loans India Limited is committed in ensuring employees are treated fairly with dignity and equitably in an environment free of prejudice, gender bias, intimidation and sexual harassment. Company is also committed to promoting a work environment that is conducive to the professional growth of its employees and encourages equality of opportunity. Company will not tolerate any form of sexual harassment and is committed to take all necessary steps to ensure that its employees are not subjected to any form of harassment.

Effective date – this policy will be effective from the date of approval of Board Meeting which was held on 18/07/2016.

### **2. DEFINITIONS**

- “Employee” means:

A person employed at a workplace for any work, on regular, temporary, ad hoc or daily wage basis, either directly or through an agent, including a contractor, with or without the knowledge of the principal employer, whether for remuneration or not, or working on a voluntary basis or otherwise, whether the terms of employment are express or implied and includes a co-worker, a contract worker, probationer, trainee, apprentice, or called by any other such name.

- “Employer” means:

The head of the organization or any person who is responsible for the management, supervision and control of the work place.

- “Sexual Harassment” means:

Sexual Harassment is an unwanted, unwelcome or uninvited behavior of a sexual nature which makes a person feels humiliated, intimidated or offended. Sexual harassment can take many different forms and may include physical contact and advances, verbal comments, jokes, demand or request for sexual favors, showing pornography, making sexually colored remarks, displaying of offensive material, any other unwelcome physical, verbal or non-verbal conduct of sexual nature or other behavior which creates a sexually tense or hostile working environment.

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The following circumstances, among other circumstances, if it occurs or is present in relation to or connected with any act or behavior of sexual harassment may amount to sexual harassment:

- (i) Implied or explicit promise of preferential treatment in her employment; or
- (ii) Implied or explicit threat of detrimental treatment in her employment; or
- (iii) Implied or explicit threat about her present or future employment status; or
- (iv) Interference with her work or creating an intimidating or offensive or hostile work environment for her; or
- (v) Humiliating treatment likely to affect her health or safety.

This is only an indicative list of the possible acts which could be treated as sexual harassment and is no way intended to be construed as an exhaustive list

- “Aggrieved” means:

In relation to a workplace, a person of any age whether employed or not, who alleges to have been subjected to any act of sexual harassment by the Respondent.

- “Respondent” means:

Against whom the aggrieved has made a complaint.

- “Internal Committee” means:

An Internal Complaints Committee constituted for redressal of sexual harassment complaint.

- “Member” means:

A member of the Internal Committee.

### 3. OBJECTIVE

1. To fulfill the directive of the Supreme Court of India enjoining all employers to develop and implement a Policy against sexual harassment of women at the work place or in the course of official duties. The policy will remain applicable wherever employees have occasion to interact with each other including for example, in vehicles, third party premises, off site meetings and public venues.
2. To uphold women’s right to protection against Sexual Harassment and the right to livelihood and towards that end for the prevention and redressal of Sexual Harassment of women.

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3. To evolve an effective mechanism for the prevention, prohibition and redress of sexual harassment of women at the work place or in the course of official duties with the Company.
4. To promote an environment that will raise awareness about and deter acts of sexual harassment of employees of the Company.
5. To ensure implementation of the Policy in letter and spirit by taking all necessary and reasonable steps including but not limited to constitution of appropriate Committees for purposes of gender sensitization and to conduct enquiries into complaints of sexual harassment.
6. To uphold the commitment of the Company to provide an environment that is free from discrimination and violence against women.
7. To generate general awareness against sexual harassment of women at the workplace.

#### 4. SCOPE

This policy extends to all categories of employees of the company including management and workmen, trainees, temporary appointees and employees on contractual basis.

#### 5. APPLICABILITY

This policy is applicable to:

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

#### 6. COMPLAINT REDRESSAL COMMITTEE

The company has constituted an "Internal Complaints Committee" (the Committee) for redressal of sexual harassment complaint (made by the victim) and for ensuring time bound treatment of such complaints. Initially, and till further notice, the Complaints Committee will comprise of the following members:

S. No.	Name of the member	Position in the committee
1.	Mrs. Diksha Khandelwal	Presiding Officer
2.	Mr. Satish Gautam	Member
4.	Mrs. Neema Goyal	Member (External)
5.	Ms. Disha Jain	Member

Mentor encourages any employee who feels they have been harassed to contact any Committee Member.

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## 7. REDRESSAL PROCEDURE

A) Procedure for an Informal Grievance Redressal, if you are being harassed:

- (i) Tell the accused that his/her behavior is unwelcome and ask him/her to stop.
- (ii) Keep a record of incidents (dates, days, time, locations, possible witness, what happened, your response). It is not mandatory to have a record of events to file a complaint, but a record can strengthen your case and help you remember the details over time, in case the complaint is not filed immediately.
- (iii) File a complaint as soon as possible. If, after asking the accused to stop his/her behavior, the harassment continues, report to the Internal Complaints Committee formed for this purpose.

B) Procedure for Formal Grievance Redressal:

The aggrieved person may make, in writing, a complaint of sexual harassment at the workplace, within a period of three months from the date of incident and in case of a series of incidents, within a period of three months from the date of the last incident.

Provided where such complaint cannot be made in writing, the Presiding Officer or any Member of the Committee shall render all reasonable assistance to the aggrieved for making the complaint in writing.

If the Committee finds that the circumstances were such which prevented the aggrieved from filing a complaint within the said period, then the Committee may extend the time limit. However, the extension cannot exceed three months. Also, the reasons for extension of time limit have to be recorded in writing.

Where the aggrieved is unable to make a complaint on account of his/her physical or mental incapacity or death or otherwise, his/her legal heir or such other person as may be prescribed may make a complaint.

The Committee member on receiving a complaint will intimate the committee head. The Committee head would arrange for a meeting within one week of receipt of the complaint for discussing the complaint raised. Once the complaint is received by the Internal Complaints Committee, the committee, may, and at the request of the aggrieved take steps to settle the matter between the aggrieved and the respondent through conciliation. Provided that no monetary settlement shall be made as a basis of conciliation.

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Where a settlement has been arrived through conciliation the committee shall record the settlement so arrived and forward the same to the Company to take action as specified in the recommendation. Further, the committee shall provide the copies of settlement as recorded to the aggrieved and the respondent. Where a settlement is arrived, no further inquiry shall be conducted by the committee.

However, if the aggrieved informs the Committee that any term or condition of the settlement arrived at has not been complied with by the respondent, the Committee shall proceed to make an inquiry into the complaint or, as the case may be, forward the complaint to the police. Where both the parties are employees, the parties shall during the course of inquiry be given an opportunity of being heard and a copy of the findings shall be made available to both the parties enabling them to make representation against the findings before the Committee. The inquiry in this case shall be completed by the committee within a period of ninety days.

On completion of the inquiry, the Committee shall provide a report of its findings to the employer, within a period of 10 days from the date of the completion of the inquiry and such reports can be made available to the concerned parties.

## 8. MANNER OF INQUIRY INTO COMPLAINT

- i. On receipt of the complaint, the Committee shall immediately proceed with the inquiry and communicate the same to the Complainant and person against whom complaint is made.
- ii. The Committee shall prepare and hand over the Statement of Complaint to the person against whom complaint is made and give him / her an opportunity to submit a written explanation within 7 days of receipt of the same.
- iii. The Complainant shall be provided with a copy of the written explanation submitted by the person against whom complaint is made.
- iv. The parties shall not be allowed to bring any legal practitioner to represent them in their case in any stage of the proceedings before the Committee.
- v. The Committee shall provide every reasonable opportunity to the Complainant and to the person against whom complaint is made, for putting forward and defending their respective case.
- vi. The Committee shall complete the inquiry within reasonable period but not beyond three months and communicate its findings and its recommendations for action to the GM-HR.
- vii. The GM-HR will direct corrective action in accordance with the recommendation proposed by the Committee and keep the complainant informed of the same.

Corrective action may include any of the following:

- a. Written apology
- b. Warning

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- c. Change of work assignment / transfer for either the accused or the victim
- d. Withholding of promotion
- e. Withholding of pay rise or increments
- f. Terminating the respondent from service
- g. Undergoing a counseling session
- h. Conducting a community service

The employer, can also take actions other than the above mentioned, if it deems fit.

## 9. PUNISHMENT FOR FALSE AND MALICIOUS COMPLAINTS

- i. If the Committee arrives at a conclusion that:
  - (a) The allegation against the respondent is malicious; or
  - (b) The aggrieved or any other person making the complaint has made a complaint knowing it to be false; or
  - (c) The aggrieved or any other person making the complaint has produced any false or misleading document;

Then, it may recommend to the Company to take necessary action against the complainant or the person who has made a complaint. However, a mere inability to substantiate a complaint or provide adequate proof need not attract action against the complainant. A malicious intent on part of the complainant can be established only after conducting an inquiry into the complaint.

- ii. If the Committee arrives at a conclusion that during the inquiry any witness had given false evidence or produced any forged or misleading document, it may recommend to the employer of the witness, to take action as may be prescribed in the provisions of the statutory laws.
- iii. If a complaint has been made in bad faith, as demonstrated by clear and convincing evidence, disciplinary action which may include demotion, suspension or termination will be taken against the person raising the complaint.

## 10. FINDINGS AND CONCLUSION OF THE INQUIRY

- 1. Where the Committee arrives at a conclusion that the allegation against the defendant has not been proved, it shall recommend to the Competent Authority that no action is required.
- 2. Where an incident of Sexual Harassment has been determined by the Committee, corrective / disciplinary action based on the gravity of the offence may be recommended to the Management of the Company/Competent Authority.

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3. The range of Corrective measures / disciplinary and such suitable measures and action which the Competent Authority may consider to impose, may include but not limited to:
  - a) A communication / letter of warning be sent to the employee and a copy of which shall be placed in the personal file of that employee by Human Resources Department.
  - b) Immediate transfer or any other appropriate disciplinary action.
  - c) Stoppage of increment with or without cumulative effect.
  - d) Reduction in rank.
  - e) Termination/dismissal from the services of the Company by the Competent Authority.
  - f) Any other action that the Competent Authority may deem fit and proper; and
  - g) Filing of a complaint before the relevant statutory / police authorities / court of law.
4. The Management of the Company shall provide all necessary assistance for the purpose of ensuring full, effective and speedy implementation of this Policy.
5. The Committee shall analyze and submit periodical inquiry reports on all such complaints received by it at the end of each financial year to the Competent Authority of the Company.
6. Upon receipt of the Inquiry Report, the Competent Authority shall promptly act on the Inquiry Report. If the Competent Authority disagrees or wishes to modify the recommendations of the Committee against Sexual Harassment, it may do so by recording the reasons in writing.
7. A copy of the Inquiry Report shall be given by the Competent Authority to the Complainant and the Defendant. The Competent Authority shall however take disciplinary action only after giving the defendant an opportunity to reply to the findings of the Committee.

## 11. 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 the investigatory process to the extent practicable and appropriate under the circumstances. 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. The Company will ensure that the victim or witnesses are not victimized or discriminated against while dealing with complaints of sexual harassment.

## 12. POLICY AMENDMENT AND REVIEW

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The Policy will be implemented and reviewed by the HR department. The Company reserves the right to amend, abrogate, modify, and rescind/reinstate the entire policy or any part of it at any time.

Sd/-  
**Pawan Kumar Goyal**  
**Managing Director**

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