POLICY ON PREVENTION OF SEXUAL HARASSMENT AT WORKPLACE (POSH)

SERVITIUM MICRO FINANCE PRIVATE LIMITED

Document Name	**Servitium Micro Finance Private Limited – POSH Policy**
Reviewed By	**Board of Directors**
Approved By	**Board of Directors**
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SERVITIUM MICRO FINANCE PRIVATE LIMITED (SMPL)

MEMORANDUM TO BOARD OF DIRECTORS

POLICY ON PREVENTION OF SEXUAL HARASSMENT AT WORKPLACE (POSH)

1. **OBJECTIVE & SCOPE:**

Company is committed to provide safe workplace free from sexual harassment. This policy is applicable to all employees, trainees, contract staff, BC agents, female customers / visitors at branches, Head Office, and at any work-related location including training, field visits.

Zero tolerance to sexual harassment.

2. WHAT IS SEXUAL HARASSMENT?

As per Section 2(n) of Act, includes any unwelcome act:
a) Physical contact and advances
b) Demand / request for sexual favours
c) Sexually coloured remarks
d) Showing pornography
e) Any other unwelcome physical, verbal, non-verbal conduct of sexual nature
f) Implied / explicit promise of preferential treatment, threat of detrimental treatment, threat about employment, creating hostile work environment.
i) Social media.

3. INTERNAL COMPLAINTS COMMITTEE (ICC):

As per Section 4, Company constitutes ICC as under:

Name	Designation	Mobile No.	Email ID
Ms Rituparna Ghosh	Presiding Officer	8240688090	servitium.coo@servitium.in
Mr. Pijush Saha	Member	9831011457	pijush.saha68@gmail.com
Mrs. Sampriti Sarkar	Member	9477413668	sampritisarkar1992@gmail.com
Mr. Pinaki Gupta	External Member	8240376113	pinajaya77@rediffmail.com

Tenure: - 3 Years. At least 50% women members.
Quorum: 3 members including Presiding Officer and External Member.
ICC to be formed at HO level at Khardaha, Kolkata.

4. COMPLAINT MECHANISM:

a) Aggrieved woman can give written complaint to any ICC member within 3 months from incident (extendable by further 3 months for valid reason).
b) Friend, relative, co-worker can file on her behalf with written consent.
c) Confidentiality - Identity of complainant, respondent, witnesses to be kept strictly confidential. Violation punishable as per Act.
d) ICC to complete inquiry within 90 days from receipt and submit report to Management within 10 days.
e) During inquiry, ICC can recommend - Transfer of respondent / Leave to complainant, restrain from reporting.

5. INQUIRY PROCEDURE & ACTION:

a) Principles of Natural Justice - Both parties heard.
b) If complaint proved: Action as per Service Rules - Written apology, Warning, Counselling, Withholding promotion/increment, Transfer, Termination, Deduction from salary as compensation to victim.
c) If complaint not proved: No action.
d) If complaint found to be false / malicious with false evidence: Action against complainant as per rules.
e) Compensation to be decided considering mental trauma, loss of career, medical expenses, income of respondent.

6. DUTIES OF COMPANY:

a) Display ICC details at all branches on Notice Board in English, Bengali, Hindi.
b) Organize awareness workshop at joining and on half-yearly basis.
c) Provide assistance to file police complaint if victim desires.
d) No retaliation against complainant. It should be treated as misconduct.

7. APPEAL:

Aggrieved by ICC recommendation, one may appeal to MD /Court / Tribunal within 90 days.

8. POSH Training:

POSH Training will be organized once in a year, and all employees must attend the training.

9. CONCLUSION:

Non-compliance is misconduct. This Policy to be read with HR Policy/ Manual.
Board to review annually.