

POLICY ON PREVENTION OF SEXUAL HARASSMENT AT WORKPLACE

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In its meeting held on 28/03/2019, the Board of Directors of Panthoibi Housing Finance Company Limited (PHFCL) has approved the proposal for review of the Sexual Harassment Policy of PHFCL and the amended Sexual Harassment Policy of PHFCL is as under.

1. Commitment

Panthoibi Housing Finance Company Limited is committed in providing a work environment that ensures each and every employee of the Company is treated equally with dignity and respect without any gender discrimination and from any harassment at work including sexual harassment.

The Company will operate a zero tolerance policy for any form of sexual harassment in the workplace by its employees and is committed to take all the necessary actions possible; to ensure that the complainant dignity is respected in every way possible. Any employee, if found to be guilty under sexual harassment policy on investigation, will face disciplinary actions which even includes termination from employment.

2. Objective

Keeping in mind to preserve the best interest of employees in the workplace; Panthoibi Housing Finance Company has adopted the policy on sexual harassment in order

- a. To safeguard the privacy and dignity of the employee; and
- b. Equal treatment of gender in the workplace

3. Disclosure as per Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013

The Company has in place a policy on prevention against sexual harassment in line with the requirements of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013. The Internal Complaints Committee has been set up to reduce complaints received regarding sexual harassment. All employees (permanent, contractual, temporary, trainees) are covered under this policy.

4. Definition

Sexual harassment is considered as one of the serious offense, it is an unwelcome conduct of a sexual nature or sexual advances which makes a person feels offended, humiliated, unsecure and intimidated. Sexual harassment may be of physical, verbal or non-verbal. Example of conduct or behavior which constitutes sexual harassment includes, but is not limited to:

Physical conduct

- Physical contact including patting, pinching, hugging, fondling, or inappropriate touching
- Physical violence, including sexual assault
- Use of job-related sexual favors

Verbal conduct

- Comments on an employee's appearance, private life, etc.
- Sexual comments, stories and jokes
- Sexual advances
- Insults based on the sex of the employee

Non-verbal conduct

- Leering
- Sexually-suggestive gestures
- Display of sexually explicit or suggestive material

Panthoibi Housing Finance Company Limited recognizes that sexual harassment may also occur between persons of the same sex. Inappropriate conduct could also be a joke, a prank or even a compliment. These gestures lead to harassment although the intention of the employee towards another might not be to offend the other employee. Yet sexual conduct is not welcome by the person against whom the conduct is directed. Any employee who sexually harasses will be reprimanded in accordance with this internal policy.

5. Responsibilities

Employees of Panthoibi Housing Finance Company Limited with great enthusiasm regard the aspect of following the policy on Sexual harassment.

'A respect to one's privacy means respect towards you', the employees of the Company are encouraged to maintain and treat each and every-one with respect not only in the Company premises but as well as in the society.

6. Internal Complaint Committee

An Internal Complaint Committee has been set up in order to investigate the related complaints on sexual harassment and to settle the case or cases within a stipulated period of time. The Internal Complaint Committee consists of the following:

- | | | |
|----------------------------|---|----------|
| a. Thokchom Bidyamani Devi | - | Chairman |
| b. Thokchom Hemo Singh | - | Member |
| c. Tayenjam Rakesh Singh | - | Member |

7. Procedures

The Company ensures in providing and safeguarding the best interest possible in bringing a resolution concerning sexual harassment. In order to precede a victim of sexual harassment can precede his/her complaint in the following manners:

a. Informal Complaint

- Give an opportunity to the alleged harasser to respond to the complaint
- Ensure that the alleged harasser understands the complaints process
- To bring a fair resolution between the parties or refer the matter to a designated mediator within the Company to resolve the matter
- Assuring to keep the record of the resolution brought up
- Follow up, to track that the incident is not repeated in future

b. Formal Complaint

- Interviewing the victim and the harasser separately
- Interviewing the witness or related employee separately
- Time, place of the incident took place is recorded and decision is made

If the conduct deemed to be true, certain measures are taken up

- i. Written apology to the victim
- ii. Demotion of the employee
- iii. Suspension
- iv. Termination

- Follow-up to ensure that the recommendations are implemented and the behavior of the harasser stopped
- Keeping a record of all the necessary actions taken

- Ensure that all records are kept confidential
- Ensure that the problem is solve within a very short period

8. Sanctions and disciplinary measures

An employee when found guilty, under the terms of the policy is liable to any of the following sanctions:

- Verbal warning
- Written warning
- Reduction in salary
- Demotion
- Suspension
- Termination

9. Implementation of the Policy

Panthoibi Housing Finance Company Limited will ensure that the policy is widely disseminated to all relevant persons. All the employees will be trained and given detailed information about the policy. It is the responsibility of every manager to ensure that all his/her employees or staff or team members are aware of the policy.

10. Monitoring and evaluation

Panthoibi Housing Finance Company Limited recognizes the importance of monitoring this sexual harassment policy and will ensure that it anonymously collects statistics and data as to how it is used and whether or not it is effective. The Company will evaluate the effectiveness of this policy and make any changes necessary.

11. Conclusion

Panthoibi Housing Finance Company Limited reiterates its commitment in providing its employees a workplace free from harassment and any discrimination and heartily follows that every employee's privacy is treated equally with dignity and respect.