

FAMILY HOME FINANCE PRIVATE LIMITED

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

Adopted/ Amendment	Board Meeting Date(s)	Version No.
Adoption of the Policy	April 30, 2026	1.0

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1. OBJECTIVE OF THE POLICY:

Family Home Finance Private Limited strongly believes in Gender Equality and committed to create an equal employment opportunity. The Company also believes that all the employees of the Company have the right to be treated with dignity and hence the Company is instrumental in creating a healthy working environment that enables employees to work without fear of prejudice and sexual harassment. The Company recognizes that Sexual Harassment violates fundamental rights of gender equality, right to life and liberty and right to work with human dignity guaranteed by the Constitution of India.

The main objective of this policy is to ensure gender equality and prevent any act of Sexual Harassment and to ensure a congenial environment where employees can work without any inhibition and contribute their best without any fear or favour.

2. APPLICABILITY & SCOPE OF THE POLICY:

The policy shall come into force with immediate effect. This policy is applicable to both female and male employees of Family Home Finance Private Limited and to any visitor on our premises or to any client or business associate engaged in any act of sexual harassment. Despite of the fact that the main object of the Company is to ensure gender equality and prevent any kind of sexual harassment, the Company shall abide by 'The Sexual Harassment of Women At Workplace (Prevention, Prohibition and Redressal) Act, 2013' and rules, notifications prescribed by the Government and any amendments thereof in the said act, rules notifications made by Government from time to time and the same shall be applicable to the Company. In case of any discrepancy between the Policy and the Act, the Act shall prevail. The policy extends to all employees, interns, consultants, contractual staff, and covers offsite, virtual, travel.

3. DEFINITION:

- a. Aggrieved woman means in relation to a workplace, a woman, of any age whether employed or not, who alleges to have been subjected to any act of sexual harassment by the respondent
- b. 'Complaint' means a formal complaint made by the aggrieved person against the respondent in written form or through an email.
- c. 'Employer' means any person responsible for the management, supervision and control of the workplace.
- d. 'Employees' 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. It also includes employees on contract, and summer trainee.
- e. 'Internal Committee' means an Internal Complaints Committee constituted by the Company.
- f. 'Member' means a Member of the Internal Complaints Committee of the Company.
- g. 'Presiding Officer' means the Presiding officer of the Internal Complaints Committee of the Company as nominated by the Committee.
- h. 'Respondent' means a person against whom the aggrieved person has made a complaint of any act of sexual harassment

i. "Workplace" includes (a) any premises, locations, establishments, enterprises, institutions, offices, branches or units established, subsidiaries which are controlled by the A.K. Group; (b) Any place visited by the employee arising out of or during the course of employment including transportation by the employer for undertaking such journey.

j. 'Sexual Harassment' includes any one or more of the following unwelcome acts or behavior (whether directly or by implication) namely:-

I. Physical contact and advances; or

II. A demand or request for sexual favours; or

III. Making sexually coloured remarks; or

IV. Showing pornography; or

V. Any other unwelcome physical, verbal or non-verbal conduct of sexual nature; or

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

i. Implied or explicit promise of preferential treatment in his/her employment; or

ii. Implied or explicit threat of detrimental treatment in his/her employment; or

iii. Implied or explicit threat about his/her present or future employment status; or

iv. Interference with his/her work or creating an intimidating or offensive or hostile work environment for him/her; or

v. Humiliating treatment likely to affect his/her health or safety.

The following conduct/ behaviour shall also constitute SEXUAL HARASSMENT:-

1. Unwanted physical conduct including grabbing, brushing, touching, sexual flirtation, molestation, advances or propositions, pin-ups.

2. Sex oriented jokes or references, offensive personal references, demeaning, insulting, intimidating or sexually suggestive comments (oral or written) about an individual's personal appearance.

3. Sending unwelcome communication of sexual nature via electronically transmitted messages such as e-mail, mobile technology, letter etc.

4. Display of offensive or derogatory or sexually suggestive objects, pictures, photos.

5. Any person intrudes in the personal life of any employee.

4. FILING OF COMPLAINT:

A. The aggrieved person may file a written complaint to the Presiding Officer (Chairperson) of the Internal Complaints Committee (ICC).

B. However, if the aggrieved person is unable to make a complaint on account of his/her physical or mental incapacity a complaint may be filed by- her legal heir or such other person as may be prescribed may make a complaint under this section as mentioned below:

- i. his/ her relative or friend; or
- ii. his/her co-worker; or
- iii. any person who has knowledge of the incident, with the written consent of the aggrieved person.
- iv. Where the aggrieved person is dead, a complaint may be filed by any person who has knowledge of the incident, with the written consent of his/her legal heir.

Provided further that the Internal Committee or, as the case may be, the Local Committee may, for the reasons to be recorded in writing, extend the time limit not exceeding three months , if it is satisfied that the circumstances were such which prevented the woman from filing a complaint within the said period.

5. CONSTITUTION OF ICC:

The ICC Committee is composed minimum of 4 members including Presiding Officer, 2 employees and 1 external member.

A. The Company shall constitute a Committee to be known as “Internal Complaints Committee” comprising of the following members to consider and redress complaints of Sexual Harassment. Presiding Officer - A woman employed at a senior level in the workplace from amongst the employees

B. Not less than two members from amongst employees preferably committed to the cause of women or who have had experience in social work or have legal knowledge..

C. Any one Senior Management Personnel of the Company representing the Employer.

D. One member from amongst non-governmental organizations or associations committed to the cause of women or a person familiar with the issues relating to sexual harassment

The member appointed from amongst the non-governmental organisations or associations shall be entitled to Rs. 200 (Rupees Two Hundred) for holding the proceedings of the ICC and also the reimbursement of travel cost incurred in travelling by train in three tier air condition or air conditioned bus and auto rickshaw or taxi, or the actual amount spent by him on travel, whichever is less.

The present composition of the ICC is provided in Clause 14 of this Policy.

The Presiding Officer (Chairperson) and Members of the Committee shall be nominated by the Employer, who shall hold office for such period, not exceeding three years, from the date of their nomination by the Employer.

The Committee shall consist of atleast one-half of the total Members so nominated shall be women. The Presiding Officer (Chairperson) of the ICC shall be Woman.

A quorum of 3 members is required to be present for conducting the inquiry . The quorum shall include the Presiding Officer (Chairperson), atleast two members, one of whom shall be a woman.

Apart from meeting to give effect to the proceedings, the Members of the Committee shall also meet once in every quarter to review the functioning of the Committee.

The Committee shall be liable to report to the Board of Directors of the Company about the Complaints received, Resolved and Pending to be resolved along with disciplinary actions recommended by the Committee to the Management at the end of every quarter. The Board of Directors of the Company shall review and note the same in the Board Meeting.

The Committee shall prepare an annual report in each calendar year the format as prescribed in Annexure-I of the Policy and the same shall be submitted to the Employer. The Employer shall be responsible for forwarding the report to the District officer appointed in this regards.

The Company shall in its Annual Report disclose the number of sexual harassment cases filed, if any and their disposal in each calendar year. The Company shall take appropriate measures to display this Policy on the official website of the Company.

The Presiding Officer (Chairperson) or any Member of the ICC shall be removed from the Committee, if:-

- a. Has been convicted for an offence or an inquiry into an offence under any law for the time being in force is pending against him/her; or
- b. He/ she has been found guilty in any disciplinary proceedings or a disciplinary proceeding is pending against him/her; or
- c. Has so abused his position as to render his/her continuance in office prejudicial to the public interest,

And such a vacancy created or any casual vacancy shall be filled by fresh nomination as per the requirement of this policy.

6. REDRESSAL AND INQUIRY MECHANISM:

a. Any person aggrieved for being sexually harassed, either directly or indirectly shall make a formal complaint against the respondent, which may be in written form or through an email to the Presiding Officer (Chairperson) of the ICC within a period of three months from the date of incident or in case of series of incidents, within a period of three months from the date of the last incident. At the time of filing the complaint, the complainant shall submit to the Complaints Committee, six copies of the complaint along with supporting documents and the names and addresses of the witnesses.

b. The Presiding Officer (Chairperson) shall determine whether complaint falls under the purview of Sexual Harassment. If the complaint does not mean an offence of Sexual Harassment, the same would be dropped after recording the reasons thereof and intimated to the complainant. If the complaint falls under the purview of Sexual harassment, then the ICC shall send a copy of the complaint along with the supporting documents, to the respondent within seven working days from the date of receipt of complaint by the Presiding Officer.

c. The respondent shall file his reply to the complaint along with his list of documents, and names and addresses of witnesses, within a period not exceeding ten working days from the date of receipt of the documents specified.

d. The Presiding Officer (Chairperson) shall hold a meeting of the Committee and shall give both the parties an opportunity of being heard. Both the parties at their discretion may tender documentary evidences, oral or written material, etc. to substantiate their point.

f. The Statement may be recorded in a manner comfortable to complainant ensuring dignity and confidentiality.

g. The respondent, if found guilty shall be liable to disciplinary action as recommended by the Committee which may go upto termination or suspension from the work.

h. The Committee shall not disclose the identity and address of the aggrieved person and any information relating to complaint and action taken by the Employer to public, press and media.

i. In case the complaint is found to be false, the Complainant shall, if deemed fit, be liable for appropriate disciplinary action as recommended ICC to the Management. Provided that a mere inability to substantiate a complaint or provide adequate proof need not attract action against the complainant under this section: Provided further that the malicious intent on part of the complainant shall be established after an inquiry in accordance with the procedure prescribed, before any action is recommended.

j. The parties shall not be allowed to bring in any legal practitioner to represent them in their case at any stage of the proceedings before the ICC.

k. ICC where the respondent is an employee, proceed to make complaint inquiry into the complaint in accordance with the provisions of the service Rules applicable to the respondent and where no such Rules exist, in such manner as may be prescribed or in case of a domestic worker. ICC, shall have the same powers as are vested in a civil court under the Code of Civil Procedure, 1908 when trying a suit in respect of the following matters, namely:

- (a) summoning and enforcing the attendance of any person and examining him on oath;
- (b) requiring the discovery and production of documents; and
- (c) any other matter which may be prescribed.

The inquiry shall be completed within a period of ninety days.

During the pendency of an enquiry, on a written request made by the aggrieved woman, ICC may recommend to the employer to:

- (i) transfer the aggrieved woman or the respondent to any other workplace; or
- (ii) grant leave to the aggrieved woman up to a period of three months; or
- (iii) grant such other relief to the aggrieved woman as may be prescribed.

l. The leave granted to the aggrieved woman under this section shall be in addition to the leave she would be otherwise entitled.

m. On the recommendation of the ICC under sub-section (1), the employer shall implement the recommendations made under sub-section (1) and send the report of such implementation to the ICC.

7. POSSIBLE DISCIPLINARY ACTIONS:

The Committee may recommend any of the following disciplinary actions to the Employer:-

A letter of warning that will be placed in the personal file of the harasser.

Immediate transfer or suspension without pay or both.

Fine equivalent to 2-4 months' salary that can be credited to a fund created to be utilized for the welfare of the employees.

Stoppage of increment with or without cumulative effect.

Reduction in rank.

Termination/dismissal from the services of the Company.

Filing a complaint in the relevant police station or court.

As per service rules and proportional to gravity

Any other disciplinary action as may deem fit.

8. THIRD PARTY HARASSMENT:

Where sexual harassment occurs as a result of an act or omission by any third party, clients, vendors, consultants, visitors or outsider, Company will take all steps necessary and reasonable to assist the affected person in terms of support and preventive action.

9. ROLES AND RESPONSIBILITIES:

ICC:-

- The Committee shall investigate every formal complaint received from the aggrieved person.
- Recommend the Employer necessary disciplinary actions to be taken against the accused person.
- Recommend the Employer regarding the necessary programs, seminar, training to be conducted to create awareness among the employees.
- Documentation of formal complaints received along with supporting documents of proceedings etc.
- To maintain register of complaints received, resolved and pending in details along with description either in physical form or through electronic mode.
- The ICC or, shall in each calendar year prepare an annual report and submit the same to the employer and the District Officer before January 31 every year.

The annual report which the ICC shall have the following details:

(a) number of complaints of sexual harassment received in the year;(b) number of complaints disposed off during the year;(c) number of cases pending for more than ninety days;(d) number of workshops or awareness programme against sexual harassment carried out;(e) nature of action taken by the employer or District Officer.

- To prepare minutes of every meeting of the Committee.
- ICC shall on completion of inquiry, shall provide a report of its findings to the employer, or as the case may be, the District Officer within a period of ten days from the date of completion of the inquiry and such report be made available to the concerned parties. Where the ICC arrives at the conclusion that the allegation against the respondent has not been proved, it shall recommend to the employer and the District Officer that no action is required to be taken in the matter. Where the ICC arrives at the conclusion that the allegation against the respondent has been proved. It shall recommend to the employer or the District Officer, as the case may be:
 - (i) to take action for sexual harassment as a misconduct in accordance with the provisions of the service Rules applicable to the respondent or where no such service Rules have been made, in such manner as may be prescribed;(ii) to deduct, notwithstanding anything in the service Rules applicable to the respondent, from the salary or wages of the respondent such sum as it may consider appropriate to be paid to the aggrieved woman or to her legal heirs, as it may determine, in accordance with the provisions of section 15:

Provided that in case the employer is unable to make such deduction from the salary of the respondent due to his being absent from duty or cessation of employment it may direct to the respondent to pay such sum to the aggrieved woman:

Provided further that in case the respondent fails to pay the sum referred to in clause (ii), the ICC or, may forward the order for recovery of the sum as an arrear of land revenue to the concerned District Officer.

- The ICC shall make inquiry into the complaint in accordance with the principles of natural justice.
- The ICC shall have the right to terminate the inquiry proceedings or to give an ex-parte decision on the complaint, if the complainant or respondent fails, without sufficient cause, to present herself or himself for three consecutive hearings convened by the Chairperson or Presiding Officer.
- (1) The ICC may, before initiating an inquiry under section 11 and at the request of the aggrieved woman take steps to settle the matter between her and the respondent through conciliation: Provided that no monetary settlement shall be made as a basis of conciliation.
(2) Where settlement has been arrived at under sub-section (1), the ICC, shall record the settlement so arrived and forward the same to the employer or the District Officer to take action as specified in the recommendation.
(3) The ICC, shall provide the copies of the settlement as recorded under sub-section (2) to the aggrieved woman and the respondent.
(4) Where a settlement is arrived at under sub-section (1), no further inquiry shall be conducted by the ICC,.
- The Committee shall complete the inquiry within three months from the date of receipt of complaint. On completion of an inquiry, the Committee shall provide a report of its findings to the employer or as the case may be, the District Officer within ten days from the date of completion of inquiry and such report shall be made available to the concerned parties.
- On receipt of the complaint, the ICC shall send one of the copies received from the aggrieved woman to the respondent within a period of seven working days.
- (1) The Internal Committee or the Local Committee, as the case may be, shall in each calendar year prepare, in such form and at such time as may be prescribed, an annual report and submit the same to the employer and the District Officer. (2) The District Officer shall forward a brief report on the annual reports received under sub-section (1) to the State Government.

Employer:

- The Employer shall be responsible for effective and prompt implementation of this policy.
- It shall be the duty of the Employer to ensure that a disciplinary action as recommended by the Committee is promptly implemented against the accused.
- Shall take all necessary steps to create awareness against sexual harassment at workplace by conducting programs, seminars, training etc. at regular intervals for employees as recommended by the Committee and orientation programmes for the members of the ICC in the manner as may be prescribed.
- Shall widely publicize that sexual harassment is a crime and shall not be tolerated.
- The employer shall include in its report the number of cases filed, if any, and their disposal under this Act in the annual report of his organisation or where no such report is required to be prepared, intimate such number of cases, if any, to the District Officer.
- To display guidelines at workplace to create awareness against Sexual Harassment.
- Employer shall formulate and widely disseminate an internal policy or charter or resolution or declaration for prohibition, prevention and redressal of sexual harassment at the workplace intended to promote gender sensitive safe spaces and remove underlying factors that contribute towards a hostile work environment against women
- Employer shall provide necessary facilities to the ICC for dealing with the complaint and conducting an inquiry;(e) assist in securing the attendance of respondent and witnesses before the ICC;(f) make available such information to the ICC as it may require having regard to the complaint made.
- Employer shall provide assistance to the woman if she so chooses to file a complaint in relation to the offence under the Indian Penal Code, 1860 or any other law for the time being in force;(h) cause to initiate action, under the Indian Penal Code, 1860 or any other law for the time being in force, against the perpetrator, or if the aggrieved woman so desires, where the perpetrator is not an employee, in the workplace at which the incident of sexual harassment took place;(i) treat sexual harassment as a misconduct under the service Rules and initiate action for such misconduct.

- Employer shall monitor the timely submission of reports by the ICC.
- Employer shall carry out orientation programmes and seminars for the Members of the ICC and carry out employees awareness programmes and create forum for dialogues which may involve Panchayat Raj Institutions, Gram Sabha, women's groups, mothers' committee, adolescent groups, urban local bodies and any other body as may be considered necessary and conduct capacity building and skill building programmes for the Members of the ICC. Every employer shall use modules developed by the State Governments to conduct workshops and awareness programmes for sensitising the employees with the provisions of the Act.
- Employer shall declare the names and contact details of all the Members of the ICC.
- Employer must display at any conspicuous place in the workplace, the penal consequences of sexual harassments; and the order constituting, the Internal Committee

Respondent

- The respondent shall file his reply to the complaint along with his list of documents, and names and addresses of witnesses, within a period not exceeding ten working days from the date of receipt of the documents as specified.

Employees

- Abstain from committing any act of sexual harassment at the workplace.
- Report incidents of sexual harassment without any fear.
- Co-operate with the Committee and Employer during inquiry.
- Create conducive environment for co-workers at workplace.
- Abide by the guidelines set out in this Policy and by the applicable Act.
- The employees shall be personally responsible to ensure that they maintain the code of conduct as required by the policy. Further, they shall also be responsible to report or Complaint against any acts of sexual harassment as soon as possible to the Presiding Officer (Chairperson) of the ICC.

Human Resource Department

- Conduct necessary programs, seminars, trainings etc. in consultation with the Committee and the Employer.
- Ensure that the Policy is communicated to all the employees of the Company.
- Clarify any doubts or difficulties arising in the Policy.
- Ensure availability of appropriate medications and hospitalization facility in case of any emergency arising out of injury caused due to sexual harassment.

Appeal.—(1) Any person aggrieved from the recommendations made under sub-section (2) of section 13 or under clause (i) or clause (ii) of sub-section (3) of section 13 or sub-section (1) or sub section (2) of section 14 or section 17 or non-implementation of such recommendations may prefer an appeal to the court or tribunal in accordance with the provisions of the service rules applicable to the said person or where no such service rules exist then, without prejudice to provisions contained in any other law for the time being in force, the person aggrieved may prefer an appeal in such manner as may be prescribed. (2) The appeal under sub-section (1) shall be preferred within a period of ninety days of the recommendations.

10. PROHIBITION OF VICTIMISATION:

No person shall be victimized for anything said or done in relation to any complaints or proceeding under this act.

The Company shall ensure that no employee who brings forward a harassment concern be subjected to any form of reprisal. However, any employee abusing the said protection under this policy shall be subject to disciplinary action by the Employer.

11. CONFIDENTIALITY:

The Company will maintain confidentiality throughout the proceedings of the case of sexual harassment in order to protect the interest of aggrieved woman, the respondent, the witnesses and the person who reports the case of sexual harassment.. Further, it shall be the duty of the Company to keep all the documents, minutes, records etc. of the case confidential, provided that nothing shall apply in case the appropriate Government Authority or the Court of Justice asks for such documents, minutes, records etc. The identity and addresses of the aggrieved woman, respondent and witnesses, any information relating to conciliation and inquiry proceedings, recommendations of the ICC per the contents of the complaint made, and the action taken by the employer or the District Officer under the provisions of this Act shall not be published, communicated or made known to the public, press and media in any manner: Provided that information may be disseminated regarding the justice secured to any victim of sexual harassment under this Act without disclosing the name, address, identity or any other particulars calculated to lead to the identification of the aggrieved woman and witnesses.

Where any person entrusted with the duty to handle or deal with the complaint, inquiry or any recommendations or action to be taken under the provisions of this Act, contravenes the provisions of section 16, he shall be liable for penalty in accordance with the provisions of the service rules applicable to the said person or where no such service rules exist, in such manner as may be prescribed.

12. POWER TO AMEND THE POLICY:

The Company reserves the right to amend the Policy. The Management shall have the right to make any addition or deletion or to insert new clause in the Policy, with prior consultation of the Committee. However, the amendments so made shall not be contrary to any act, rules, regulation, circular or notification issued by the Government in this behalf. The amendments shall also be published on the official website of the Company.

13. ICC-CONTACT DETAILS:

In case of any grievances regarding sexual harassment the employees may contact the Members of ICC of the Company.