



Policy on Prevention of Sexual Harassment at Workplace

2025-26

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Introduction

Axis Finance Limited (hereinafter referred to as „The Company“) as an employer is committed to creating a healthy, safe and secure work environment that enables employees to work free from unwelcome, offensive and discriminatory behavior. The aim is to enable them to deliver their best at work without fear of prejudice, gender bias and sexual harassment. The Company recognizes consequences of sexual harassment and that sexual harassment can subject individuals to fear, stress and anxiety. It acknowledges the strains that such harassment places on professional, personal and family life of an individual.

Sexual harassment at the workplace is a form of discrimination. It is therefore unacceptable and regarded as misconduct as per this policy. In order to deal with sexual harassment at workplace, The Company has set out Prevention of Sexual Harassment Policy at Workplace hereinafter (referred to as the „POSH Policy“) to prevent sexual harassment and to enforce strong disciplinary action in face of any such occurrence.

This policy explicitly prohibits sexual harassment at work place on or off site, either during or in connection with activities related to work. It defines sexual harassment, determines the standards of behaviour expected from all employees and sets out the mechanisms of redress.

The Company will take action consistent with its disciplinary and Sexual Harassment Complaint Mechanism against any employee found to have breached this policy. The Company will also take steps to comply with any specific local laws relating to this issue.

The Company is committed to ensure that sexual harassment instances and incidents can be reported without fear of reprisal or retaliation. The Company will inquire instances / and or complaints of sexual harassment promptly and discreetly. The Company will initiate disciplinary action as per the details provided in this policy.

The Company believes that all employees, including other individuals who have

dealings with The Company have the right to be treated with dignity.

1. Objectives of POSH

- (i) Provide a work environment free from fear, reprisal, coercion, discrimination and harassment.
- (ii) Express zero tolerance to sexual harassment at workplace through Prevention, Resolution and Deterrence acts of sexual harassment.
- (iii) Enable all those working, associated and visiting The Company to raise their concerns and make complaints without any fear.
- (iv) Provide a clearly stated redressal mechanism for any sexual harassment occurring at workplace.
- (v) Provide procedure for resolution, settlement or prosecution complaints of sexual harassment
- (vi) Conduct fair inquiry and reach reasonable decision in a timely manner.
- (vii) Compliance with applicable law.

2. Scope of POSH

The policy applies to all of the employees and work environments of The Company, whether at The Company facilities, customer facilities or in Company-related settings, including social events. Policy is deemed to be incorporated in the service conditions of all employees and comes into effect immediately.

This policy covers a range of communication, all of which will be regarded as offensive if found unwelcome by the complainant regardless of the format or style of the communication, or whether the technology exists at the time of the publication of this policy.

3. What constitutes Sexual Harassment?

According to The Supreme Court of India, the definition of "Sexual Harassment" includes any one or more of the following unwelcome acts or behaviour (whether directly or by implication) namely:

- (i) Physical contact and advances; or
- (ii) A demand or request for sexual favours; or
- (iii) Sexually coloured remarks; or
- (iv) Showing pornography; and
- (v) Any other unwelcome physical, verbal or non-verbal conduct of a sexual nature.

Accordingly, The Company defines the following behaviour objectionable and will treat it under the preview of Sexual Harassment:

- 3.1 Sexually coloured remarks and verbal sexual innuendos, such as: jokes, suggestions, or hints about sexual behaviour, comments about physical appearance.
- 3.2 Physical contact such as pushing, grabbing, jostling, touching the body and / or making such advances.
- 3.3 Non-verbal communication such as staring, gestures of a sexual nature, removal of clothing to display parts of the body (flashing).
- 3.4 Display, giving or sending of pornography in the form of pictures, books, magazines, postcards, photos, sculpture, drawing, painting, animation, sound recording, film, video, and video games or offensive and / or abusive language.
- 3.5 Demands and / or offers and / or requests, such as for sexual favours, sexual attention, or to spend time together.
- 3.6 Following, stalking, persistent visiting, telephoning, sending of cell-phone messages or emails, chat messages, or other invasions of personal privacy. This will include physical confinement against one's will.
- 3.7 Act or conduct by a person such as spreading rumours about sexuality, gender and / or character of a person which creates the environment at workplace hostile or intimidating to a person.
- 3.8 Any other physical, verbal and non-verbal behaviour which is sexual in nature done personally and / or via documents, or by telephone, cell-phone messages, web site communication, or emails.

Following circumstances, among other circumstances, if it occur or is present in relation to or connected with any act or behaviour of sexual harassment it shall amount to Sexual Harassment:

- Implied or explicit promise of preferential treatment in his / her employment.
- Implied or explicit threat of detrimental treatment in his / her employment.
- Implied or explicit threat about his / her present or future employment status.
- Interferes with his / her work or creating an intimidating or offensive or work environment for him / her; or
- Humiliating treatment likely to affect his / her health and / or safety.

The behaviour may be a single incident or continuous unwelcome behaviour.

Intention of the person and/or motive behind the behaviour will NOT be taken into account when it comes to classifying/naming behaviour as sexual harassment.

Impact of the behaviour on the person is important.

What one employee may take into account as unobjectionable behaviour may be not acceptable and comforting to another employee. Core to this policy is how the person perceives/understands/interprets the behaviour.

There will be no justification and defense in this light for sexual harassment. If the person who is registering a complaint was offended, humiliated or intimidated by the behaviour of the person or even felt so, it will fall within the scope of this policy.

Please refer to Appendix I for more examples of Sexual Harassment.

4. Complaint Mechanism

A Central Internal Complaints Committee (hereinafter referred to as CICC) is functional at the Company to redress Sexual Harassment at work place. This committee shall also function as the local committee until other Local Complaint Committees (hereinafter referred to as LCC) are formed.

Both the CICC and the LCC shall be headed by a woman and not less than half of its members shall be women. At least, one member of HR department will form part of the committee. As per law mandate, we have empaneled an External Member who is familiar with the issue of sexual harassment at work place. The External Member shall be empaneled through an offer of engagement for a period of one year and shall be entitled to a retainer fee that may be mutually agreed upon.

The period of holding office of the presiding officers and members of the Internal Committee i.e., the CICC and RIC shall not exceed three years, from the date of their nominations

The POSH committee members will be decided by MD & CEO.

A quorum of 50% of CICC Members is required, including the Presiding Officer to be present for the proceedings to take place.

The External Member shall be empaneled through an offer of engagement for a period of one year and shall be entitled to a retainer fee that may be mutually agreed upon. The period of holding office of the presiding officers and members of the CIC and Regional Representative shall not exceed three years, from the date of their nominations.

Employee Responsibilities:

The complainant, whether s/he has decided to lodge a complaint or not, should attempt to indicate to the person indulging in the behaviour both verbally and non-verbally that the behaviour is unwelcome, and specifically requesting the person to stop the behaviour.

Where the complainant feels that s/he cannot do this, or they have done this but the behaviour continues, then s/he may use the Sexual Harassment Complaint Mechanism.

Any employee who feels s/he is being sexually harassed directly or indirectly or any employee who is aware of such an act been done can inform and approach any member of the CICC member on the email id posh.afl@axisfinance.in or with a written complaint.

The complaint should be made within three months from the date of incident and in case of series of incidents, within a period of three months from the date of last incident. Any employees who is not part of the CICC and has received or is aware of a complaint should bring it to the notice of the CICC.

The complainant may inform and approach any member of the Human Resources Department, or their Manager, or the Manager of the personnel responsible for the behaviour or a CICC member or any employee whom he/ she is comfortable with a written complaint as soon as possible.

It is important that complainant keeps a written record of dates, times, details of the conduct and witnesses, if any.

Each complaint should at the minimum be specific as to

- (i) The nature of sexual harassment;
- (ii) The identity of the person(s) who is/are alleged to be involved in the act of sexual harassment;
- (iii) Mention of witnesses, if any
- (iv) Facts and circumstances of the harassment for the purpose of substantiation; and
- (v) Data/ facts available in support of the complaint.

That after the receipt of the complaint by The Company and / or the above mentioned persons / mechanisms; it shall be immediately handed over to the CICC.

Anonymous Complaints:

The policy does not encourage any anonymous complaints. The committee may make reasonable attempts to address anonymous complaints received by it. All such complaints will be put up in the CICC meetings and the decision to pursue / drop the case will be taken on the basis of the discussions therein and recorded accordingly.

4.1 Complaint Resolution:**Formal Complaint Resolution Procedure**

At the commencement of the inquiry, the CICC shall explain to both the complainant and the person against whom complaint is made the procedure which will be followed in the inquiry.

- 4.1.1 When the complaint is received, it will be promptly investigated in a fair and expeditious manner. In the event of a written/ email complaint received by the CICC, the CICC shall look into the complaint within 15 working days of receipt of complaint. The CICC will maintain records of the complaint received by it. The complaints shall be kept confidential and shared only for related purposes.
- 4.1.2 Only a CICC member shall conduct the inquiry.
- 4.1.3 The CICC will organise a meeting with the complainant to enquire into the matter and intimate date, time and place of inquiry to all relevant persons.
- 4.1.4 If the Complainant does not wish to appear before the CICC due to valid reasons, a CICC member or a person authorized by the CICC will meet him / her and record the statement. The CICC shall take a final decision on this.
- 4.1.5 At the first meeting, the CICC members shall hear the complainant and record his / her allegations. The complainant can also submit any corroborative material with a documentary proof, oral or written material, etc., to substantiate his/her complaint.
- 4.1.6 The CICC shall prepare and hand over the statement of charges to the person against whom complaint is made and give him / her opportunity to submit a written explanation if s/he so desires with the time specified by the CICC. If no written statement is submitted by the defendant within the time specified, the CICC may proceed with the inquiry.
- 4.1.7 Thereafter, the person against whom complaint has been registered may be called for a deposition before the CICC and an opportunity will be given to him / her to give an explanation. It shall be recorded by the CICC.
- 4.1.8 The complainant shall be provided with a copy of the written explanation submitted by the person against whom complaint is made.
- 4.1.9 If the complainant or the person against whom complaint is made desires any witness/es

to be called, they shall communicate in writing to the CICC the names of witness/es that they propose to call. The CICC shall call upon all witnesses mentioned by both the parties.

- 4.1.10 The CICC depending upon the situation and circumstances 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 in the best possible way via examination of witnesses and cross examination.
- 4.1.11 The CICC is free to obtain from the Human Resources department and / or from the department concerned such information in the form of written communication, witnesses, previous records, and data of the concerned / relevant employees which may be helpful for the inquiry. All employees and The Company would cooperate in this regard. The CICC will have the right to ask any of the employees to appear before it.
- 4.1.12 Respect of all the persons involved and confidentiality would be maintained throughout the inquiry process. Likewise the complainant as well as the persons going through the process of an inquiry must maintain confidentiality of the matter.
- 4.1.13 All proceedings of the CICC will be recorded in writing and the same together with the statement of witnesses shall be endorsed by the complainant and respondent in token of authenticity thereof. In case of refusal to endorse the same by either party the endorsement shall be made by the Chairperson with appropriate remarks. All parties involved in the process are at liberty to place on record any objections or observations.
- 4.1.14 On completion of an inquiry a report would be made available within 90 days.
The report will contain outline of the case, inquiry process, conclusion and recommendations by the CICC.
- 4.1.15 The report would be submitted to the Human Resources department and / or The Company with the recommendations of resolution. The CICC shall share findings of the inquiry with the complainant and the person charged with sexual harassment.
- 4.1.16 The report of the CICC shall be treated as an inquiry report on the basis of which a charged person can be awarded appropriate punishment by The Company.
- 4.1.17 The CICC shall keep complete and accurate documentation of the complaint, its inquiry and the resolution thereof. The incident would be documented in both the complainant's and the respondent's files with the full report of the CICC.
- 4.1.18 In the event, the complaint does not fall under the purview of sexual harassment; the same would be dropped after recording the reasons thereof and referred to Human Resource department if needed.
- 4.1.19 CICC depending on the safety and other parameters may ask the complainant whether she/he needs a transfer.

- 4.1.20 The CICC depending upon the situation and circumstances can recommend to the Human Resources Department and/or The Company that the person charged with sexual harassment to be kept under suspension/or sent on transfer from the time it was decided to have a formal inquiry till the time such inquiry is completed to avoid tampering of documents and pressure on the witnesses and the receiver.
- 4.1.21 In case if any party involved do not agree with the inquiry results can appeal to open the inquiry again to the CICC.

4.2 Rules of Evidence before the CICC

In particular, in conducting an inquiry, the CICC:

- 4.2.1 Shall be sensitive to the covert, private and insidious nature of sexual harassment and shall take into account that often the complainant may not be able to lead direct or corroborative evidence.
- 4.2.2 Shall not permit any evidence or examination based on the complainant character, personal life, general conduct, personal and sexual history.
- 4.2.3 Shall take note of the respective socio-economic positions of the parties, their hierarchy in the organization and workplace, the employer-employee equations and other power differences while appreciating the evidence.
- 4.2.4 Shall inform the complainant that he/she may give his/her evidence in writing; in both cases s/he shall make itself available for examination by the CICC on the evidence submitted by him/her.
- 4.2.5 May disallow any questions desired to be put by the respondent to the complainant which it feels are derogatory, irrelevant or slanderous to him/her.
- 4.2.6 Shall inform the person against whom complaint is made that s/he may give his/her answers to questions of a sensitive nature in writing immediately in the inquiry proceedings during cross examination.

5 Disciplinary Action

- 5.1 Where the behaviour is such as use of inappropriate words, or jokes, or simple contact cell-phone messages, or invitations, counselling of the person responsible for the behaviour and/or warning in writing may be appropriate. This will be subject to the recommendations by the CICC.
- 5.2 Repeated incidents and/or serious incident(s) of sexual harassment may lead to summary dismissal.
- 5.3 The Company may on its own transfer either the complainant or the person against whom complaint is made if The Company, at its sole and absolute

discretion, is of the view that such action is necessary for it to ensure its intent to provide a workplace free of sexual harassment is furthered. Where appropriate and where possible with The Company structure, and depending upon the nature of the work undertaken by the complainant and the person responsible for the behaviour, sanctions to avoid dismissal such as transfer to a different position or department may be considered.

- 5.4 In all situations, behaviour of the person charged with sexual harassment will be strictly monitored by the CICC and / or by the Human Resources department during the post inquiry phase.
- 5.5 The above Sexual Harassment Complaint mechanism would be used judiciously to ensure fair and healthy working environment within The Company and keep the high morale of the employees.

6 Criminal Proceedings

- 6.1 Where such conduct amounts to a specific offence under the IPC or under any other law, the Law Department of the Company based on advice may initiate appropriate action in accordance with law by making a complaint with the appropriate authorities.
- 6.2 The Company would ensure that complainant or witnesses are not victimised or discriminated against while dealing with complaints of sexual harassment.

7 Fair use of Policy

The Company is strongly opposed to misuse of this policy. Therefore the complainant must be prepared to go through a fair process of inquiry by the CICC. In case the complaint is found to be done with malicious intent, the Human Resource Department will counsel the complainant and recommend suitable action to prevent recurrence while ensuring the complainant is not victimised and others are deterred from raising complaints in bad faith. The Complainant shall, if deemed fit, be liable for appropriate disciplinary action by The Company.

8 Ensuring Well Being Of The Complainant

- 8.1 The Company on the recommendation of the CICC and / or the Human Resources department may seek appropriate expert advice and arrange for help and support for the complainant in the form of counselling and / or medical attention.
- 8.2 Permission for leave of absence may be given to the complainant by The Company if necessary. If the leave entitlement is exhausted, additional

leave may be granted to alleviate impact of sexual harassment. The Company and/ or Human Resource Department shall take a final decision on this.

9 Protection of User of this Policy

Any employee, who, in good faith, lawfully and truthfully, seeks advice, raises a concern or reports misconduct is following this policy doing the right thing. The Company will not allow retaliation against that person. Individuals engaging in retaliatory conduct will be subject to disciplinary action, which may include termination. If you suspect that you or someone you know has been retaliated against for raising a issue, immediately contact the Human Resources Department or CICC.

10 Conclusion

At The Company, it has been and shall be constant effort of all the employees in creating conducive work environment where the relationship between employees is cordial. The Company is committed to the implementation of the objectives of this policy, of procedures laid down, to the training of all employees in what constitutes sexual harassment, how complaints may be lodged, and how the complaints should be dealt with by supervisors, managers and members of the CICC.

The sexual harassment policy is subject to change periodically as per changing times and needs of The Company or change in the law of the land.

11 Action After Inquiry

On completion of the inquiry, the below shall be actioned:

- a. In the event the allegation is not proven:

The CICC shall not recommend any action to be undertaken by the Ethics Department.

- b. In the event the allegation stands proven:

The CICC shall recommend to take action against the respondent for sexual harassment as a misconduct in accordance with the Code of Conduct & Ethics.

- c. Post the CICC investigation, if the complaint does not fall within the definition of sexual harassment or within the CICC's jurisdiction, the complaint will be referred by the CICC to Human Resources Department for appropriate investigation and action as per the Company's Code of Conduct & Ethics.

- d. The CICC may also recommend to HR for actions like transfer of the Respondent/change of roles, any other recommendation as deemed fit.

12 Annual Report

The CICC/LCC shall prepare an annual report with details of number of complaints received, number of complaints disposed off during a given calendar year, number of cases pending for more than 90 days, number of workshops or awareness programmes organized, and nature of action taken by Company shall be approved by the CICC. The annual report shall be submitted to the District Officer appointed by the State Government in this regard.

13 Appeal Against the Inquiry

Any person Aggrieved (Complainant or Respondent) by the decision of the CICC Related to the quantum or nature of penalties recommended by the CICC, as per the POSH Act, may appeal to the appellate authority under the Industrial Employment (Standing Orders) Act, 1961.

APPENDIX1

Examples of behaviour which in return for employment, promotion, examination or evaluation of a person towards any Company activity or other conduct of a sexual nature, which may constitutesexualharassment:

- Implied and overt promise of preferential treatment for that employee;
- An implied or overt threat of detrimental treatment in that employee's employment or an implied or overt threat about the present or future employment status of that employee and includes the creation of a hostile working environment;
- The conduct interferes with an employee's work or creates an intimidating, hostile or offensiveworkenvironment;
- Such conduct can be humiliating and may constitute a health and safety problem;
- Where any of these acts is committed in circumstances where under the victim of such conduct has a reasonable apprehension that in relation to the complainant's employment or work such conduct can be humiliating and may constitute a health and safety problem;

Such discriminatory conduct for instance when the person has reasonable grounds to believe that his/her objection would disadvantage him/her in connection with his/her employment or work including recruiting or promotion or when it creates a hostile work environment. Adverse consequences might be visited if the complainant does not consent to the conduct in question or raises any objection thereto.

Verbal

- Bringing sexual topics into discussion
- Showing pornography
- Asking intimate questions about a person's personal/sex life
- Telling jokes about sex
- Sexual innuendo
- Requests for sexual favours or dates (particularly repeatedly)
- Remarks of a sexual nature about clothing, looks, anatomy
- Use of abusive language having sexual overtones

Non-Verbal

- Winking, leering, suggestive gestures
- Sexist and sexual graffiti
- Sending offensive, or sexually explicitly material by email or by phone message
- Displaying sexually suggestive material

Physical

- Un-welcome touching or patting
- Brushing up against another person's body

The most serious incidents will include:

- Actual or attempted sexual assault or rape
- Sexual threat or coercion
- Benefit in exchange for sexual favour

