



## **PREVENTION-OF-SEXUAL-HARASSMENT-POLICY**

### **OBJECTIVE:**

The objective of this policy is to provide protection against sexual harassment of women at workplace and for the prevention and redressal of complaints of sexual harassment and for matters connected therewith.

All concerned should take cognizance of the fact that Tokyo Finance Limited strongly opposes sexual harassment, and that such behavior against women is also prohibited by the law as laid down in 'The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013' and Rules framed thereunder (hereinafter referred to as "Act"). Commission of any act of sexual harassment as defined in the Act and in this Policy shall result in strict disciplinary action.

### **INTERNAL COMPLAINTS COMMITTEE / COMPLAINT REDRESSAL COMMITTEE:**

An Internal Complaints Committee/ Complaint Redressal Committee (hereinafter called 'Committee') have been constituted by the Management of the Company to consider and redress complaints of Sexual Harassment. The Chairman and Members of the Committee are as follows:

(i) Ms. Aleyamma Thomas	- Chairperson
(ii) Ms. Bharati Joshi	- Member
(iii) Mr. Haresh V. Shah	- Member
(iv) Nominees from NGO or External	- Member

### **The Complaints Committee is responsible for:**

- Investigating every formal written complaint of sexual harassment
- Taking appropriate remedial measures to respond to any substantiated allegations of sexual harassment
- Discouraging and preventing employment-related sexual harassment

### **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 any investigatory process to the extent practicable and appropriate under such circumstances.

### **Dispute Resolution Prior To Enquiry**

The Internal Complaints Committee may if, and only if so requested by the aggrieved woman, try to resolve the matter informally by intervening and thereby permitting the parties to resolve the matter mutually before the commencement of the formal enquiry proceedings.

### **Third Party Harassment**

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



### **Manner Of Inquiry Into Complaint**

- a) Complainant shall submit to the committee, 6 copies of complaint along with supporting documents and the name and address of the witnesses;
- b) Within 7 working days the committee shall send one of the copy to respondent;
- c) Respondent shall file his reply with documents and name and address of the witnesses within 10 working days (or such longer time as the Committee may allow in special circumstances/reasons to be recorded in writing ) from the date of the receipt of notice;
- d) The committee shall make the inquiry on the principles of Natural Justice;
- e) If complainant or respondent fails to present for 3 consecutive hearings convened by chairperson without sufficient cause, the committee shall have the right to terminate the proceedings or give ex-parte decision;
- f) Provided such termination or ex-parte decision may not be passed without giving 15 days advance notice in writing to the party concerned;
- g) The parties shall not be allowed to bring in any legal practitioner;
- h) In conducting inquiry a minimum of 3 members including Presiding Officer shall be present;
- i) Where both parties are employees, the parties shall , during course of inquiry, be given an opportunity of being heard;
- j) The Inquiry shall be completed within a period of Ninety days from the date of complaint;
- k) The committee shall provide the report of its finding to the employer within a period of 10 days from date of completion of the inquiry and such report be made available to concerned parties as well.

### **Corrective action may include any of the following:**

- a. Formal apology
- b. Counseling
- c. Written warning to the perpetrator and a copy of it maintained in the employee's file.
- d. Change of work assignment / transfer for either the perpetrator or the victim.
- e. Suspension or termination of services of the employee found guilty of the offence

### **DISSEMINATION OF POLICY**

Copy of policy shall be circulated to all the employees of the Company. A copy of the same also made available at the website of the Company [www.tokyofinance.in](http://www.tokyofinance.in).

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