



ORANGE CITY HOUSING
Finance Private Limited
(Formerly Known as ORANGE CITY HOUSING FINANCE LIMITED)

Sexual Harassment Policy

Version 1.1

For Private Circulation Only

Sexual Harassment Policy

I. Introduction

Orange City Housing Finance Private Limited (OCHFL) is a Housing Finance Company (HFC) based in Nagpur, registered with the National Housing Bank, New Delhi, wholly owned by the Reserve Bank of India. OCHFL is incorporated with Registrar of Companies, Mumbai under the Companies Act 1956, and is one of the 100 odd HFC license holders across India and the first in Central India. OCHFL aims to provide affordable housing loans to all sections of society. Since our inception, we will lead our customers on the path to prosperity by providing home loans to individuals for Purchase / Construction / Extension / Renovation etc. to help them to achieve their goals of owning their own home.

II. Company Philosophy

OCHFL was created to provide credit access to first time home buyers in EWS/LIG/MIG category and aims to contribute meaningfully towards the Indian Government's mission of "Housing for All". The Company intends to work on a philosophy of giving back to the society in a way and fashion that will cause a sustainable change for the less fortunate of India's populace without any discrimination based on religion, creed, caste, color or gender. The Company aims to undertake those initiatives which would bring about positive irreversible change for the betterment of the society and would help the beneficiaries quantitatively and qualitatively in their lives, with the underlying aim of decreasing the wealth inequality of Indian society.

Our Vision is to be the leading Housing Loan provider known for

- Exceptional Customer Service
- Loan Affordability
- Transparency of Operations
- Contribution to Society

OCHFL is geared towards fostering a maximally satisfied customer base with a mutually profitable relationship. It is therefore important to be completely open and honest with the customer and use simple, clear and unambiguous terms when offering a product or service to them.

This Policy serves as a set of broad guidelines to the loan origination team with these policy principles in mind.

III. Mission of Policy

OCHFL wholeheartedly believes in and complies with the general practices that are in line with the Master Directions and Circulars provided by the National Housing Bank to HFCs. At OCHFL, we believe that an effective management and administration combined with transparency and accountability is imperative to ensure a long and healthy life for the company.

The purpose of this document is to define lending policy and guidelines for the company in accordance with the Company law and NHB Master Directions and Circulars for HFCs. This is a living document and should be updated on a regular basis. Any regulatory changes that would impact the accountability of the company should be reflected here.

This document should not be seen in isolation but in conjunction with the other policy documents that define the overall workings of the company. For the sake of simplicity and to avoid confusion, any matter covered in other policy documents is not repeated in this document.

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IV. Objective

OCHFL as a philosophy believes in dealing with every stakeholder including employees in a fair manner and does not discriminate anyone on the basis of gender, caste, creed or religion. In this regard, the Company firmly believes in providing safe working environment to its women employees that is free from any kind of harassment and is conducive to their professional growth. The Company has developed guidelines and have implemented the same across business areas and geographies that contain best practices to prevent and even prosecute the act of sexual harassment of women at workplace. This policy covers all acts of sexual harassment that allegedly are committed by the employee against women employee within or outside the Company premises

Any non-compliance / violation of this policy by the employees will call for investigation against him, prosecution against him, taking remedial measures and safeguarding the victim. The action may be taken even against the employees who though may not directly involved, have failed to stop the sexual misconduct even when there was an opportunity to do so.

The policy provides framework that includes definition of misconduct and resolution mechanism to address sexual harassment allegations made by any women employee and thereby enable the implementation of provisions of Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013

V. Applicability

The contents of this policy are applicable to all employees (On roll/off roll). OCHFL would not tolerate any kind of sexual harassment caused to its women employee (irrespective of employment type) by any stakeholder including customer, business associates, vendors and suppliers.

The workplace includes:

- A. All offices or other premises where the Company's business is conducted.
- B. All company-related activities performed at any other site away from OCHFL's premises.
- C. Any social, business or other functions where the conduct or comments may have an adverse impact on the workplace or workplace relations.

VI. Definition of Sexual Harassment

Sexual harassment may be one or a series of incidents involving unsolicited and unwelcome sexual advances, requests for sexual favours, or any other verbal or physical conduct of sexual nature. Sexual Harassment at the workplace includes:

- A. Unwelcome sexual advances (verbal, written or physical)
- B. Demand or request for sexual favours
- C. Any other type of sexually-oriented conduct
- D. Verbal abuse or 'joking' that is sex-oriented
- E. Any conduct that has the purpose or the effect of interfering with an individual's work performance or creating an intimidating, hostile or offensive work environment and/or submission to such conduct is either an explicit or implicit term or condition of employment and /or submission or rejection of the conduct is used as a basis for making employment decision

VII. Responsibility Regarding Sexual Harassment

All employees of OCHFL have a personal responsibility to ensure that their behavior is not contrary to this policy. All employees are encouraged to reinforce the maintenance of a work environment free from sexual harassment.

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VIII. Responsibility of the Company

It would be the responsibility of the Company to:

- A. Prohibit, prevent and deter commission of acts of sexual harassment
- B. Implement the Policy in strict alignment, thus creating a favorable environment
- C. Spread awareness of the Policy amongst its employees by providing easy access to the policy through publication, notification and circulation of the same
- D. Sensitizing employees about sexual harassment issues
- E. Provide fair and impartial procedures for resolution, settlement or prosecution of acts of sexual harassment by taking all necessary steps
- F. Implementation of recommendations of the Anti-Sexual Harassment Committee

It is the responsibility of the HR vertical to understand the complaint made by the complainant and counsel the complainant as well as accused. They need to be made aware of implication of formally filing the complaint or not doing the same. In case the Committee becomes aware of an act of sexual harassment which is subsequently proven, then it shall have the right to initiate action against the accused even in the absence of formal complaint made by the complainant

IX. Anti-Sexual Harassment Committee

The Company has set up an Anti-Sexual Harassment Committee with an objective to address all complaints of alleged sexual harassment submitted by the complainant and / or initiate action to prevent such instances happening. The Committee has the power to set up further committees or sub committees as and when required and depending on the merit of the case.

The Committee consists of the following:

1. The Committee shall have minimum 4 members at any given time; out of which majority would be women members. The same constitution shall be followed at Head-Office and at Branch level.
2. Presiding officer who shall be a woman (In the absence of any women at a senior level men shall be considered) employed at a senior level at workplace from amongst the employees.
3. The members of the committee should possess requisite experience in social work and should have sound legal and related administrative knowledge. Not less than two members from amongst employees preferably committed to the cause of woman or who have had experience in social work or have legal knowledge.
4. One member from amongst non-governmental organisations or associations committed to the cause of women or a person familiar with the issues relating to sexual harassment.

The committee would meet as and when required. The minimum quorum required for convening a committee meeting is 3 members. It is mandatory to have at least half of the members of the Committee to be women and that the Committee is headed by a woman. The maximum tenure of the members and the chairperson would not exceed three years. The members are entitled for re-appointment

The member / person shall be deemed ineligible for being appointed, reappointed, continue being a member of the committee if:

- A. He has been found guilty in any disciplinary proceedings (including complaint of sexual harassment) or a disciplinary proceeding is pending against him

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- B. 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
- C. Has so abused his position as to render his continuance in office prejudicial

It is the responsibility of the Committee that all complaints related to sexual harassment are attended to with confidentiality in line with outlined process as per this policy.

X. Complaint Submission

An aggrieved employee who has been a victim of alleged sexual harassment by another employee/stakeholder has the right to submit a formal complaint with the committee either in person or through writing an official letter addressed to any committee member or through sending an email at complaints@ochfl.in within a period of 3 months from the date of incident or last incident in case of series of incidents. In case there is a further delay, then the committee may accept the complaint depending on the merit of the case and considering the circumstances which prevented the complainant to submit the complaint within the 3 months period. The complainant has to be provided full confidentiality and necessary safeguards to protect his/her dignity at workplace and in private life. In case the complaint is made against a member of the committee, then that person shall be removed from the committee immediately and shall not play a role in the investigation. Upon receipt of the complaint, the committee shall inform the complainant about the convening of the meeting related to the complaint and also invite to remain personally present during the meeting.

At the time of filing the complaint, Details with respect to the following may be provided in the complaint:

- (i) The alleged event, matter or issue that is subject to the complaint (time/date/place etc.),
- (ii) The name and details of the respondent against whom the complaint is being filed,
- (iii) Names and addresses of the witnesses (if any) and
- (iv) Details of documentary evidence (if any) such as WhatsApp chat records, SMS, E-mails, CCTV Footage, Audio / Video recording etc.

In the first meeting, the complainant shall be provided an opportunity to tell in detail about the harassment faced. Post hearing, the committee would take the decision whether the complaint requires further investigation or needs to be disposed if the complainant is not able to substantiate incident(s) of sexual harassment. In case the Committee accepts the complaint, then if the Complainant wishes, the accused shall be called to the meeting to be heard and be given strict warning in relation to the incident. If the aggrieved employee wishes to proceed beyond the warning, the same has to be proceeded in the manner prescribed by the policy.

XI. Committee Proceedings

- a. The Committee shall prepare the formal statement of allegation and share with the Complainant and the Accused
- b. If the accused wishes to tender written explanation to the statement of allegation, the he may submit the same to the Committee
- c. The Committee shall provide the complainant and the accused ample opportunity to prosecute and defend respectively through witnesses and evidence
- d. The Committee shall complete the investigation within a period of not exceeding ninety days and conclude by preparing a report on findings based on fact and evidence. The

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report shall be submitted to CEO/COO/Management within 10 days from the date of completion of investigation. The report shall include recommendations made to the management pertaining to the case along with the reasons

XII. Implementation of Recommendations

The management will go through the report and the recommendations made by the committee and on that basis would arrive at a decision to take remedial action against the accused within 60 days of the submission of the report. The decision shall be conveyed to the complainant and accused in a formal manner

XIII. Punitive Actions

The management can impose the below mentioned penalties which are indicative and not necessarily exhaustive against the accused who has been found guilty of sexual harassment

- A. Minor penalties: Written warning
- B. Major penalties: Withholding of performance-based incentives, withholding of annual bonus, Withholding of Promotion/ Increment, Termination of service

The accused may be asked to give a written apology to the management and the accused and on failure to do so, the penalty may be increased or compounded as per decision of the management.

In case the act of sexual harassment amounts to criminal offence under the Indian Penal Code or any applicable law of the land, the management shall take appropriate action in accordance with law by filing a complaint against the accused with the competent authority

XIV. Protection Against Victimization

- a. In the event the Accused is reporting manager / senior of the Complainant, the Company shall ensure that the Complainant is not being evaluated by the Accused and also explore possibility of relocating the Complainant to other business department.
- b. The Company shall ensure that there is no retaliation / witch hunting done against the Complainant and/or witnesses. Any act of interference or coercion by the Accused in direct or indirect manner shall be prevented by the Company and shall be leading to appropriate action being taken against the Accused by the Committee in coordination with management.
- c. In case the Accused is a third party (business associate, vendor, supplier etc.), then the Accused shall not be allowed to enter the Company workplace across the geographies except for the purpose of attending meeting as mandated by the Committee
- d. Post investigation into the complaint, the Company shall do the following:
 - 1. Accused found guilty who is a reporting manager of the complainant shall not professionally evaluate the complainant for his/her performance at workplace
 - 2. Accused who is a third party shall not be allowed to deal with the Company and be not allowed to enter the Company premises across the geographies
 - 3. In the event, the Committee, post investigation finds that the Complaint made by the Complainant was fake and was made with mala fide motives, then the Committee shall take such appropriate measures, in coordination with the Management, against the Complainant, as it may deem fit.

XV. Exceptions

There are no exceptions to this policy.

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XVI. Contact

All queries and clarifications on the policy and procedures may be referred to the Human Resources (HR) Team of the Company.