



# Policy for Prevention of Sexual harassment at Workplace

### Reviewing & Approving Authority

Authority	Designation
Prepared By	Company Secretary
Reviewed By	Top Management
Approved By	Board of Directors
Date of approval	03-06-2022
Date of review with amendment if any (due to business operation or RBI or other authority's rules or regulation as required from time to time)	20-04-2026

### Version History

Version	Brief Description
1.1	Existing Policy

### REGISTERED OFFICE ADDRESS

84-B, Dhuleshwar Garden, Sardar Patel Marg, C-Scheme, Jaipur-302001, Rajasthan

### CONTACT DETAILS

Email Id: [info@universalfingrowth.com](mailto:info@universalfingrowth.com), Phone No. 0141-2744607/91-7357705444

CIN: U65993RJ2015PTC048146

## 1. Introduction:

Universal Fingrowth Private Limited, a registered NBFC is committed to provide equal opportunity and a harassment free workplace notwithstanding race, caste, religion, colour, ancestry, marital status, gender, sexual orientation, age, nationality, ethnic origin or disability, or personal characteristics as the case may be.

Thus, in order to create such a safe and conducive work environment, this Policy has been framed, in line with the provisions of the ***“Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013[POSH Act] read with the rules framed thereunder.***

## 2. Objective of the policy:

- ❖ To ensure no person is sexually harassed at workplace.
- ❖ To promote gender sensitivity at workplace
- ❖ To promote conducive work environment for both the genders.
- ❖ To comply with legal/mandatory obligations as mandated in “Sexual Harassment of Woman at Workplace (Prevention, Prohibition & Redressal) Act 2013 and the Rules framed thereunder.

## 3. Scope of the Policy:

This policy is applicable to all employees across all the places of business of Universal Fingrowth Private Limited.

## 4. Definition of Sexual Harassment:

“Sexual harassment” includes any one or more of the following unwelcome acts or behaviour (whether directly or by implication) namely: —

- ❖ Physical contact and advances; or
- ❖ a demand or request for sexual favours; or
- ❖ making sexually coloured remarks; or
- ❖ Showing offensive pictures/cartoons/pin-ups/calendars/screen savers on computers/mobile phones/any offensive written material/pornographic; or
- ❖ Any other unwelcome physical, visual, verbal or non-verbal conduct of sexual nature including but not limited to the following:
  - cat-call, wolf/finger whistle,
  - sexual connotations, like sexually explicit compliments/cracking loud jokes

### REGISTERED OFFICE ADDRESS

84-B, Dhuleshwar Garden, Sardar Patel Marg, C-Scheme, Jaipur-302001, Rajasthan

### CONTACT DETAILS

Email Id: [info@universalfingrowth.com](mailto:info@universalfingrowth.com), Phone No. 0141-2744607/91-7357705444

CIN: U65993RJ2015PTC048146

- letters, phone calls, text messages, e-mails,
- gestures, grabbing, brushing, touching, pinching, kissing sounds.
- unwelcome demand or request subject to the condition of employment/payment of wages/increment/promotion.

## 5. Composition of Internal Committee:

In conformity with the Sexual Harassment of Woman at Workplace (Prevention, Prohibition & Redressal) Act 2013 and the Rules 13 of sexual harassment of Women at Workplace (prevention, prohibition and Redressal) Rules, 2013, an Internal Complaints Committee (ICC) has been constituted against sexual harassment in work-place. Management shall ensure that all investigations are conducted by the designated resource to ensure that prompt corrective action is taken where appropriate.

The committee shall comprise of the following members selected from the organization subject to the reappointment at the time of renewal of policy upto 3 years from the date of nomination:

Sr. No.	Name	Designation	E-Mail	Contact Details
1	Nidhi Khanna	Presiding officer	<a href="mailto:nidhi.khanna@universalfingrowth.com">nidhi.khanna@universalfingrowth.com</a>	0141-2744607/2343355
2	Kartik Ghiya	Member	<a href="mailto:support@universalfingrowth.com">support@universalfingrowth.com</a>	0141-2744607/2343355
3	Aaditya Jain	Member	<a href="mailto:hraaditya.jain@universalfingrowth.com">hraaditya.jain@universalfingrowth.com</a>	0141-2744607/2343355
4	Prateek Kaushik	Outside Member	prateek@mysolutionbox.in	7014329619

## 6. Procedure to file complaint before Internal Committee:

Any aggrieved person may make, in writing, a complaint of sexual harassment at workplace to the Internal Committee, within a period of three months from the date of incident along with the information or documents as required such as Name, Department, division, location etc.



If the Presiding Officer of the Committee determines that the allegations constitute an act of sexual harassment, she will proceed to investigate the allegation with the assistance of the Complaints Committee. In case of settlement, no further enquiry shall be conducted.

### REGISTERED OFFICE ADDRESS

84-B, Dhuleshwar Garden, Sardar Patel Marg, C-Scheme, Jaipur-302001, Rajasthan

### CONTACT DETAILS

Email Id: [info@universalfingrowth.com](mailto:info@universalfingrowth.com), Phone No. 0141-2744607/91-7357705444

CIN: U65993RJ2015PTC048146



On initiating investigation, the Committee shall send one copy of the complaint received from the aggrieved person to the respondent and may take any interim measures for purpose of justice;



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



The Committee shall make inquiry into the complaint in accordance with the principles of natural justice by giving a chance for each side to present their own case and to present their own witnesses and evidences.



The Committee shall have the right to terminate the inquiry proceedings or to give an ex-parte decision on the complaint by giving a notice of 15 days to the party concerned, if the complainant or respondent fails, without sufficient cause, to present herself or himself for three consecutive hearings convened by the Presiding Officer.



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 Complaint Committee.



Once the investigation is completed, the Internal Committee shall provide a report of its findings to the employer within a period of ten days from the date of completion of the inquiry and such report be made available to the concerned parties.



The Committee arrives at the conclusion that the allegation against the respondent has been proved, it shall recommend appropriate action to the Management to take any disciplinary action in the form of:

- ❖ Warning
- ❖ Written apology and bond of good behaviour
- ❖ Debarring from supervisory/ managerial duties

**REGISTERED OFFICE ADDRESS**

84-B, Dhuleshwar Garden, Sardar Patel Marg, C-Scheme, Jaipur-302001, Rajasthan

**CONTACT DETAILS**

Email Id: [info@universalfingrowth.com](mailto:info@universalfingrowth.com), Phone No. 0141-2744607/91-7357705444

CIN: U65993RJ2015PTC048146

- ❖ Excluding the employee from Promotion or Increment or payment of variable pay or all of the above.
- ❖ Suspension without salary
- ❖ Dismissal from the services
- ❖ Assisting the aggrieved in lodging FIR / Handing over the employee to Police
- ❖ Blacklisting of the employee
- ❖ Any other punishment as may be warranted by the case

***IF, Action for False or Malicious Complaint of False Evidence***

Where the Complaints Committee arrives at the conclusion that the allegation against the respondent is malicious or the aggrieved person or any other person making the complaint has made the complaint knowing it to be false or the aggrieved person or any other person making the complaint has produced any forged or misleading document, it may recommend to the Management, to take Disciplinary Action as per above mentioned punishments against such person initiating such malicious complaint and/or submitting false evidence.

***All concerned may be assured that the Committee and the Management will maintain the highest level of confidentiality in respect of all matters brought before it.***

\_\_\_\_\_ **\*End of Document\*** \_\_\_\_\_

**REGISTERED OFFICE ADDRESS**

84-B, Dhuleshwar Garden, Sardar Patel Marg, C-Scheme, Jaipur-302001, Rajasthan

**CONTACT DETAILS**

Email Id: [info@universalfingrowth.com](mailto:info@universalfingrowth.com), Phone No. 0141-2744607/91-7357705444

CIN: U65993RJ2015PTC048146