

PREVENTION OF SEXUAL HARASSMENT

Any harassment specifically related to sexual misconduct will be addressed under the POSH policy provisions. Harassment not covered by the POSH policy and covered under GBVH policy, will fall under the Gender-Based Violence policy. If an incident qualifies under both policies, it will be addressed under the POSH policy.

OBJECTIVE

The objective of this policy is to provide protection against sexual harassment of employees at workplace. It also provides a mechanism for prevention and redressal of complaints of sexual harassment and for matters connected or incidental thereto. This policy is set up to help the organization maintain a healthy working environment that is safe and free of sexual harassment and protect the right of employees to work with dignity.

Government of India has also directed companies to lay down policy on guiding this right of every employee under Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act 2013. This policy, when applicable to women, has been written in accordance to this directive from the Govt. of India. With regard to male employees or persons from the third gender, no directive has been laid down by the Government. Hence, action in such cases will be taken as per the organizational policies. Wherever Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act 2013 is applicable, the provisions of this act will supercede the organizational policies.

Aye Finance has a “zero tolerance” approach towards sexual harassment. Thus, this policy defines Aye Finance’s position regarding employees indulging in harassing behavior and those being sexually harassed, in order to maintain a working environment free of sexual harassment in accordance with the organizational policy.

- Aye Finance’s stand is that sexual harassment is a form of misconduct that undermines the integrity of employment relationships, and the culture and image of the organization. All employees have the right to work in an environment free from all forms of discrimination and conduct which can be considered harassing, coercive, or disruptive, including sexual harassment. The policy actively advocates the right of every Aye Finance employee to work in an environment free of all forms of sexual harassment – verbal, written, physical, visual or otherwise.
- It is Aye Finance’s policy that harassment of employees on the basis of race, region, religion, colour, national origin, ancestry, handicap, medical condition, physical features, disability, marital status, age, sexual orientation and sex, including sexual harassment is unacceptable and will not be tolerated.
- The policy believes that it impacts the morale and spirit of its employees if they are discriminated on any of the above basis points covered in previous step.
- Every employee of Aye Finance is covered under this policy from the date of joining to retirement / termination / resignation including the notice period.
- The management shall provide all necessary assistance for the purpose of effective implementation of the various aspects of this policy, in the best interest of every employee.
- Where sexual harassment occurs as a result of an act or omission by any third party or outsider, the company shall take all steps necessary and reasonable to assist the affected person in terms of support and preventive action.
- In case the constituted Committee finds the degree of offence coverable under the Indian Penal Code, then this fact shall be mentioned in its report and appropriate action shall be initiated by the Management, for making a Police Complaint.
- A safety audit would be conducted on an annual basis for employees to proactively spot trends and eliminate them at an early stage.

SCOPE

The policy is applicable to all employees – permanent, temporary, contract or any other type of employment extended by the employer in all offices (including HO, RO and Branches).

This policy will also cover any instance of sexual harassment by an employee against any visitor, client, suppliers, customers or any guest associated with the company.

This policy is also applicable to all those members of organizations that Aye Finance and its employees work with, including agents, partners, vendors, consultancies and any other firm that forms a part of the Aye Finance eco system. For details, please refer guidelines in Appendix I.

APPLICABILITY

- A. "Employee" means any person on the rolls of the Company as well as persons associated with the company such as persons on deputation, contract, on probation, as apprentice, temporary, part time or working as consultants or called by any other name.

- B. Sexual Harassment would mean:
 - 1. Physical contact, force and advances
 - 2. A demand or request for sexual favors
 - 3. Making sexually colored remarks
 - 4. Showing pornography, or other offensive or derogatory pictures, cartoons, pamphlets
 - 5. Any other unwelcome physical, verbal or non-verbal conduct of sexual nature
 - 6. Actions motivated by sexual persecution; Further, the following circumstances, among other circumstances, if it occurs or is present in relation to or connected with any act or behavior of sexual harassment may amount to sexual harassment
 - a) Implied or explicit promise of preferential treatment in employment
 - b) Implied or explicit threat of detrimental treatment in employment
 - c) Implied or explicit threat about present or future employment status
 - d) Interference with work or creating an intimidating or offensive or hostile work environment for employee
 - 7. Humiliating treatment likely to affect health or safety
 - 8. Physical confinement against one's will
 - 9. Any other sexually oriented conduct which is offensive or objectionable to the recipient, and technology-based communication including social media, emails and texting any other act likely to violate one's privacy

Any form of above-mentioned or similar conduct that is unwelcome, unwanted, uninvited, unreasonable, offensive to the complainant and adversely affects the dignity of the complainant, will be termed as sexual harassment. Physical contact is not an essential factor for sexual harassment.

Victims of sexual harassment

- Can be of any gender (male, female or person from the third gender)
- Can be of the same sex as the harasser

A Harasser can be a manager, co-worker, client, customer or peer.

Sexual harassment includes (but is not limited to):

- Verbal Harassment
 - 1. Crude, demeaning, offensive language
 - 2. Discussing sexual activities and offensive content

3. Sharing lewd comments or jokes
 4. Phrases, comments that hurt the sentiments of a community, group or ethnic background
- Physical Harassment
 1. Standing close or brushing up against another person
 2. Patting, embracing, pinching, hugging or stroking
 - Psychological Harassment
 1. Insistence to wear particular attire; commenting on physical attributes; stalking, ogling
 2. Proposal for physical intimacy (quid-pro-quo)
 - Visual Harassment
 1. Display of sexually visual material such as pinups, cartoons.
 2. Sending e-mails, SMS, WhatsApp messages, with sexually colored remarks/jokes, etc.

Sexual harassment may be committed in any work or training environment which includes but is not limited to the following scenarios:

- In or outside the office building or training site
- At the office or training-related social functions
- In the course of work assignments outside the office
- At work-related conferences, studies or training sessions
- During work-related travel

INTERNAL COMMITTEE

The Managing Director formulates the complaint redressal committee (named "Internal Committee") and the same is advised to the Board. The committee is constituted for a period of three years to address all complaints of Sexual Harassment filed by employees. Complaints by guests or vendors against employees that arise at the work place will also be redressed the committee. The committee is responsible for providing resolution, settlement or prosecution in response to the complaint received.

14.1 QUORUM OF THE COMMITTEE

The permanent members of the Committee include:

- The Presiding Officer (PO) who shall be a woman employed at a senior level from amongst the employees on the rolls of Aye Finance (If senior woman officer is not available, the PO can be nominated from the highest work level at which women officers are employed)
- Members from the employees committed to the cause or have legal knowledge.
- One member from non-governmental organizations (NGO) or associations committed to the cause of women or a person familiar with the issues relating to sexual harassment.

The 4 zonal POSH committees consist of following Committee Members:

North:

Presiding Officer - Mrs. Sheena Sakhuja, Deputy Vice President 2 – Corporate Communications
 Member - Mrs. Rekha Deobhakta, Assistant Vice President 2 - General Management
 Member - NGO worker or Lawyer*
 Member - Nancy Gupta, Vice President 1 - Credit
 Member - Mr. Ankur Sharma, Head - HR
 Member – Mr. Arnav Chatterjee - Deputy Vice President 1 -HR
 Member – Mrs. Tripti Pandey, Assistant Vice President 2 – Finance & Legal

East:

- Presiding Officer - Mrs. Sheena Sakhuja
- Member - Mrs. Tripti Pandey, Assistant Vice President 2 – Finance & Legal
- Member - Mrs. Rekha Deobhakta, Assistant Vice President 2 - General Management
- Member - NGO worker or Lawyer*
- Member – Ranjan Jha, Circle Business Head – East
- Member - Ankur Sharma, Head – HR
- Member - Mr. Arnav Chatterjee - Deputy Vice President 1 -HR

West:

- Presiding Officer - Mrs. Sheena Sakhuja
- Member - Mrs. Tripti Pandey, Assistant Vice President 2 – Finance & Legal
- Member - Mrs. Rekha Deobhakta, Assistant Vice President 2 - General Management
- Member - NGO worker or Lawyer*
- Member – Jai Shankar Pandey, Zonal Business Head – West
- Member - Ankur Sharma, Head – HR
- Member - Mr. Arnav Chatterjee - Deputy Vice President 1 -HR

South:

- Presiding Officer - Mrs. Sheena Sakhuja
- Member - Mrs. Tripti Pandey, Assistant Vice President 2 – Finance & Legal
- Member - Mrs. Rekha Deobhakta, Assistant Vice President 2 - General Management
- Member - NGO worker or Lawyer*
- Member – Raju Krishna Shinde, Zonal Business Head – South
- Member - Ankur Sharma, Head – HR
- Member – Mr. Arnav Chatterjee - Deputy Vice President 1 -HR

*Ms. Gurjeet Kaur from Youthreach NGO has been appointed as the committee member.

The committee should have minimum 50% participation from women.

Aggrieved persons can register their complaint at SafeWorkplace@Ayefin.com.

PROCESS FOR FILING A COMPLAINT

Submission of Complaint

- An employee who feels he / she has been directly or indirectly sexually harassed, can submit a written complaint to the Internal Committee providing complete details of the incidence, preferably within a period of 3 months from the date of incident and in the case of a series of incidents within 3 months from the date of last incident. The complaint can either be sent through an email to Presiding Officer or sent in a sealed envelope addressed to the Presiding Officer or shared with any of the Committee members.
- Provided, the Internal Committee may for 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 employee from filing a complaint within the said period.
- The complainant must ensure that the complaint contains all the material and relevant details concerning the alleged sexual harassment including the names of the contravener (Respondent) in the format provided in Appendix II, while it is being taken up by the Internal Committee for investigation.

Proceedings of the Internal Committee

- A. After the complaint is received as above, the Internal Committee will investigate the case as per rules laid down for the purpose.
- B. The Committee may before initiating an inquiry and at the request of the Complainant, take steps to settle the matter between the Complainant and the Respondent through conciliation. However, no monetary settlement shall be made as a basis of conciliation.
- C. The inquiry as mentioned at step 1 above shall be concluded within a period of 90 ninety days from the date on which the complaint was received by the Committee.
- D. The Committee will do the required checks. Final report and recommendations would be presented for action to the Management Council/MD to determine whether the complaint made by the complainant falls under the purview of sexual harassment, within 10 days of complaint received. This could involve:
 - i. Holding a meeting with the complainant to hear and record the statements – The complainant can also submit various proofs, like any documentary material to support the complaint.
 - ii. Meeting the person against whom the complaint has been made – The Respondent may be called for a deposition before the Committee and the committee may also call for discovery and production of documents and an opportunity will be given to him/her to give an explanation, where after, the final report shall be made.
- E. The Committee will make its determination on the further course of action which could be either of the following:
 - i. In the event where the complaints do not fall under the purview of sexual harassment or the complaint does not mean an offence of sexual harassment, the same would be dropped and the Committee would record the finding and share the same with both the parties.
 - ii. In case the complaint is found to be false and the motive is established to be malicious, the complainant shall, if deemed fit by the Committee, be liable for disciplinary action by the Management. However, such malicious intent on part of the Complainant shall be established after an inquiry in accordance with the procedure prescribed, before any action is recommended.
 - iii. In case the Committee arrives at the conclusion that the allegation against the Respondent has been proved, it shall recommend to the Management Council that action for sexual harassment as misconduct in accordance with the service rules as may be prescribed, be taken against the Respondent which may range from a warning to transfer including dismissal as per the Disciplinary procedure of the Company (Explained in next section).
- F. Management Council will direct appropriate action in accordance with the recommendation proposed by the Committee. This decision in the matter will be final and binding.
- G. When the investigation is completed, the Complainant and the Respondent will be informed of the outcome of that investigation. In the event of the Respondent/ Complainant seeking or requiring counselling intervention thereafter, the Management shall provide for the same.

The Internal Committee shall conduct such investigations in a timely manner and shall submit a written report containing the findings and recommendations to the Managing Director, within 30 days from the date of receipt of the complaint. The Managing Director & the Presiding Officer of the Internal Committee will ensure corrective action on the recommendations of the Committee and keep the complainant informed of the same.

- H. If the Complainant is not satisfied with the outcome of the proceedings before the Committee, the Complainant may prefer an appeal to the Court or tribunal prescribed under The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act and Rules in case of women employees. Other aggrieved employees can escalate complaint to the Management Council.
- I. Where such conduct, on the part of the accused, amounts to a specific offence under the law, the Company shall initiate appropriate action in accordance with law by logging a complaint with the appropriate authority.

CORRECTIVE ACTION

After investigation, the Managing Director and the Committee can suggest one or more of the following Corrective actions:

- a. Formal apology
- b. Counselling
- c. Written warning to the committer – A copy of this will be maintained in employee's file.
- d. Change of work assignment or transfer
- e. Suspension or termination of the employee found guilty of offence
- f. Legal Action

If it is proven that the person raising the complaint raised a fake complaint, the above-mentioned corrective action may be taken on the person raising the fake complaint.

CONFIDENTIALITY

The contents of the complaint, identity and address, inquiry, and any other information pertaining to the inquiry and conciliation proceedings recommendations and / or the action, if any, taken against the Complainant, Respondent and witnesses shall not be published, communicated or made known to the public, press and media and other employees by the Complainant, Committee, witnesses and other people involved in resolving the matter, except where disclosure is required under disciplinary or other remedial processes.

REPORTING AND RECORD-KEEPING

The complaints relating to sexual harassment are to be reported annually to the concerned government department. A report is maintained for the complaints and is advised to the Head of HR and the Managing Director annually.

RESPONSIBILITY OF SUPERVISORS

- It must be remembered that, all employees of this Company, particularly those in a supervisory or management capacity, are expected to become familiar with the contents of this policy and to abide by the requirements it establishes.

- Each supervisor is responsible for maintaining the workplace free of sexual harassment. This is accomplished by promoting a professional environment and by dealing with sexual harassment as with all other forms of employee misconduct.
- Each supervisor must educate his/ her respective team members about the said aspect of harassment and simultaneously warn of the repercussions.

RETALIATION PROHIBITED

The Company will permit no employment-based retaliation against anyone who brings a complaint of sexual harassment or who speaks as a witness in the investigation of a complaint of sexual harassment. This policy shall be governed by The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act and Rules as and when it comes into force and such other amendments thereto. If the provisions or any provision of this policy is found to be incomplete, ambiguous, invalid, illegal or otherwise unenforceable, not inclusive and or not in line with The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act and Rules, the same shall not affect the other provisions hereof or the whole of this policy, but such provision shall be deemed modified to the extent necessary to render such provision enforceable.

APPENDIX I

- The definition of sexual harassment as outlined in the main Policy draft in Applicability section stands.
- The Aye Finance employee complaining of sexual harassment shall complain to the Committee as outlined.
- The Aye Finance management decision shall be final on the complaint.
- All clauses in the policy document shall be valid in the investigation of the third party / agency / consultancy / partner, as the Aye Finance employee continues to be protected by the policy at all times. Communication of this policy, with all its appendices is compulsory to all third parties, consultancies / agencies and partners of Aye Finance

APPENDIX II

Format for complaint

Name of Complainant:

Employee Id:

Department:

Branch:

Date of Complaint: -----

Name of Respondent:

Department (if applicable):

Branch (if applicable):

Description of Complaint:

Any evidence/ material provided at the time of complaint:

PREVENTION OF GENDER-BASED VIOLENCE AND HARASSMENT AT WORK POLICY

The prevention of gender-based violence and harassment policy aims to recognize and assess the risks of workplace-based violence and harassment to all genders. It also aims to establish clear guidelines for employees and customers to report incidents of violence and harassment. This policy is to be referred in conjunction with Company's POSH policy. In case this policy leads to a conflict with terms mentioned in the Company's POSH policy, terms mentioned in the POSH policy will supersede this policy.

INTRODUCTION

The Company recognizes that in all organizations, there is a risk of gender-based violence and harassment.(GBVH) The company acknowledges the risks of multiple and intersecting forms of discrimination, and that gender-based violence and harassment disproportionately affects women and girls, and LGBTQ+.

This policy is intended to set out Company's guidelines for recognizing and assessing the risks of workplace violence and harassment based on gender and incrementally align with GBVH Emerging Good Practice for the Private Sector¹. It also addresses ways to report incidents of potential or actual incidents of workplace-based violence and harassment based on gender.

SCOPE

This Policy applies to all Company Employees as well as the Company's agents, guests, customers, vendors, and other third parties. This policy applies to conduct in the workplace and in any work-related settings outside the workplace, such as during business trips, tours and company-sponsored or authorized social events and other functions. This policy applies to the Company in India and its employees travelling worldwide, except where compliance with this Policy would cause an operating unit or divisions to violate any country-specific law.

DEFINITIONS

In this policy the following terms have the following meanings:

Bystander is a person who is present at/a witness of an incident of violence or harassment but does not take part. A Bystander approach is used to promote victim empathy and notions of how the workplace community is responsible for preventing sexual harassment. An empowered bystander is somebody who observes an act of violence, discrimination or other unacceptable or offensive behaviour and takes action (e.g., speak out against violence and harassment; intervene to support a colleague being targeted; talking privately to a colleague exhibiting this behaviour).

Impacted individuals may include the target/victim/affected individual as well as witnesses and persons who intervene in situations involving inappropriate behaviour and possible violence and harassment.

Report refers to formal and/or informal reporting unless otherwise specified.

¹ [Addressing-gender-based-violence-and-harrassment.pdf](#)

Sexual Harassment would mean:

- Physical contact, force and advances
- A demand or request for sexual favors
- Making sexually colored remarks
- Showing pornography, or other offensive or derogatory pictures, cartoons, pamphlets
- Any other unwelcome physical, verbal or non-verbal conduct of sexual nature
- Actions motivated by sexual persecution; Further, the following circumstances, among other circumstances, if it occurs or is present in relation to or connected with any act or behavior of sexual harassment may amount to sexual harassment
- Implied or explicit promise of preferential treatment in employment
- Implied or explicit threat of detrimental treatment in employment
- Implied or explicit threat about present or future employment status
- Interference with work or creating an intimidating or offensive or hostile work environment for employee
- Humiliating treatment likely to affect health or safety
- Physical confinement against one's will
- Any other sexually oriented conduct which is offensive or objectionable to the recipient, and technology-based communication including social media, emails and texting any other act likely to violate one's privacy

Any form of above-mentioned or similar conduct that is unwelcome, unwanted, uninvited, unreasonable, offensive to the complainant and adversely affects the dignity of the complainant, will be termed as sexual harassment. Physical contact is not an essential factor for sexual harassment.

Victims of sexual harassment

- Can be of any gender (male, female or person from the third gender)
- Can be of the same sex as the harasser

A Harasser can be a manager, co-worker, client, customer or peer.

Sexual harassment includes (but is not limited to):

- Verbal Harassment
 5. *Crude, demeaning, offensive language*
 6. *Discussing sexual activities and offensive content*
 7. *Sharing lewd comments or jokes*
 8. *Phrases, comments that hurt the sentiments of a community, group or ethnic background*
- Physical Harassment
 3. *Standing close or brushing up against another person*
 4. *Patting, embracing, pinching, hugging or stroking*
- Psychological Harassment
 3. *Insistence to wear particular attire; commenting on physical attributes; stalking, ogling*
 4. *Proposal for physical intimacy (quid-pro-quo)*
- Visual Harassment
 3. *Display of sexually visual material such as pinups, cartoons.*
 4. *Sending e-mails, SMS, WhatsApp messages, with sexually colored remarks/jokes, etc.*

Sexual harassment may be committed in any work or training environment which includes but is not limited to the following scenarios:

- In or outside the office building or training site

- At the office or training-related social functions
- In the course of work assignments outside the office
- At work-related conferences, studies or training sessions
- During work-related travel

Target/victim/affected individual is the person or persons in the workplace or in connection with work towards whom the conduct constituting possible harassment and violence is directed.

Offender/alleged offender is the person or persons in the workplace or in connection with work whose conduct constitutes harassment and violence, if established under applicable policies.

Violence and harassment in the world of work refers to a range of unacceptable behaviours and practices, or threats thereof, whether a single occurrence or repeated, that aim at, result in, or are likely to result in physical, psychological, sexual or economic harm, and includes gender-based violence and harassment. Gender-based violence and harassment, including sexual harassment, means violence and harassment directed at persons because of their sex or gender or affecting persons of a particular sex or gender disproportionately.

Employees include all full-time/part-time employees including but not limited to independent contractors and consultants who provide services to the Company.

Workplace means any land, premises, or location in or for which an employee works.

Workplace violence means:

- a) the exercise of physical force by a person against an Employee/agent/guest/customer/vendor, and other third parties, in a workplace, that causes or could cause physical injury.
- b) an attempt to exercise physical force against persons specified in (a), in a workplace, that could cause physical injury.
- c) a statement or behaviour that it is reasonable to interpret as a threat to exercise physical force, in a workplace, that could cause physical injury.

Workplace harassment means engaging in a course of vexatious comment or conduct that is known or ought reasonably to be known to be unwelcome. Harassment also includes discriminatory, abusive, or offensive verbal, visual, or physical conduct directed at a person due to their gender, gender identity or sexual orientation. Examples of behaviours that may be considered harassment include, but are not limited to, direct or indirect comments, actions, or tactics such as verbal or psychological abuse used to harm an individual or an attempt to harm an individual. Harassment or bullying can involve repeated incidents or can be one single incident.

EMPLOYEES' RIGHTS AND RESPONSIBILITIES

Employees are entitled to work in a safe environment free from workplace violence and workplace harassment.

Employees are responsible for working together in a professional manner and resolving issues in a non-

violent manner.

Formal reports of possible violence and harassment may be made by persons who consider that they were the targets/victims/affected individuals or by persons who have direct knowledge of possible violence and harassment or by any third-party. Formal reports may be made anonymously and may not be subject to deadlines.

Targets/victims/affected individuals may prefer and are encouraged to discuss their situation with a confidential informal resource, such as [e.g., confidential provider of advice/assistance] who can assist the targets/victims/affected individuals by explaining the applicable legal framework and the options available under a company's policies and practices and indicate resources available for support purposes.

Employees who observe or become aware of inappropriate behaviour or a situation of possible violence and harassment should, with training, ideally be able to support the affected individual with unbiased listening, information and referrals; confidentially report the incident to Internal Committee, or through the complaint helpline/email address and take other actions that could help mitigate hostility in the environment or harm to individuals.

Employees should cooperate in the investigation of a violent or harassing incident. Anyone who gives evidence or information in an investigation or is involved in the process, must keep this information confidential, except when it is necessary to deal effectively with the issue. Appropriate steps will be taken to ensure the safety of the Employees in the workplace. Employees shall complete prevention of violence or harassment at work training required of them by the Company.

ROLES AND RESPONSIBILITIES

Management must ensure, as much as reasonably possible, that no Employees are subjected to workplace violence or harassment.

Targets/victims/affected individuals who believe they may have been subject to inappropriate behaviour or instances of possible violence and harassment may raise this with their supervisor or other Employees in their workplace if the situation allows, and they feel comfortable doing so. Any manager approached by a target/victim/affected individual shall inform that person that confidential advice, assistance, and information about the options available under the company's legal framework to address such possible conduct may be obtained from office that provides confidential advice/assistance and support such as welfare officer, staff counsellor, helpline, or other trusted point of contact.

Management will not disclose the name of a complainant or the circumstances of the complaint to anyone except where disclosure is: (i) necessary to investigate the complaint; (ii) required to take corrective action; or (iii) required by law.

Management will ensure that all Employees are aware of the risks of workplace violence and harassment and are properly trained and equipped to protect themselves. Company will provide awareness training once a year. Company will display information to raise awareness with Internal Committee or

designated persons at prominent places across its offices. It will also include this in customer communication.

Management and Internal Committee members will undergo regular training on prevention of violence and harassment at workplace, including on raising awareness about the issue within the workforce, communicating commitments to supporting employees, spotting, and acting on warning signs, building trust, and providing confidential, non-judgmental listening, workplace supports and referrals.

POLICY

All Employees are prohibited from engaging in violence or harassment as defined in this Policy and are expected to report all incidents of violence or harassment at the workplace.

All Employees are prohibited from any unwelcome conduct of a sexual nature that might reasonably be expected or be perceived to cause offense or humiliation, when such conduct interferes with work, is made a condition of employment, or creates an intimidating, hostile, unsafe or offensive work environment.

In the event that an Employee is subjected to actual or threatened harassment or violence in the workplace, the Employee can report their complaints through following channels:

- Email ID: customer.care@ayefin.com
- Customer Care Number: 01244802300
- Internal Ombudsman
- Consumer App

Management must inform the target/victim/affected individual that the information will be handled as confidentially as possible, but that it must be disclosed to the extent necessary to conduct an appropriate investigation. Management must act promptly and decisively to investigate and stop any known or suspected violence or harassment that occurs within their unit. Management must not ignore or otherwise condone any act of violence or harassment.

Agents, guests, customers, vendors, and other non-Employees are also prohibited from engaging in violence or harassment as defined in this Policy. Employees may refuse to work with any non-Employees who engages in violence or harassment. Any non-Employees who, in the sole opinion of the Company, violate this Policy, may be barred from the Company's premises and the Company may seek to terminate its relationship with the offender.

Any Employee who is determined to have engaged in violence or harassment will be subject to appropriate disciplinary action, up to and including suspension without pay and/or termination of employment. Records of all disciplinary action will be retained in the Employee's personnel file. In addition, the offender may be required to participate in appropriate training or counselling.

Complaints may be written or verbal and may be made in person, by email, by telephone, to a company hotline, or other means and can be made anonymously. Every complaint will be investigated² and resolved as expeditiously as possible, having regard to such things as the nature of the complaint,

² To the extent possible when complaints are anonymous for need of any additional information.

the number of witnesses and whether the investigation should be conducted internally or externally. Where the conduct complained of is extremely serious nature, or where the conduct is alleged to have been made by senior management, an external and independent investigation will be preferred. In the event that there were witnesses to the complained about behavior, witnesses will be interviewed. Every effort will be made to prevent disclosure of confidential and/or sensitive information, while at the same time ensuring that each incident is carefully and completely investigated. In particular, any party interviewed during an investigation will be reminded in writing prior to their interview of the need to keep the investigation and their evidence confidential, as well as the fact that retaliation is strictly prohibited.

The target/victim/affected individual as well as the alleged offender will be provided with updates from time to time through the investigation process. Both parties will be advised in writing of the results of the investigation as well as next steps, at the conclusion of the investigation.

Implement a survivor-centred approach. Work with survivors, witnesses and whistleblowers to identify and implement safety measures in line with their wishes for their safety, Inform survivors, witnesses and whistleblowers of available support services and enable access to professional support in line with their wishes. Respect the wishes of survivors in relation to the investigation and reporting to the authorities and seek expert advice in complex situations. Ensure that survivors are treated equally, and their experience is not unfairly dismissed.

The Company will not tolerate any retaliation against Employees who makes a good faith report of violence or harassment under this Policy or anyone providing information on a good faith basis as part of any related investigation, even if after the investigation no violence or harassment is found to have occurred. Any Employees who subject other Employees to such retaliation may be subject to disciplinary action. Likewise, a known or proven false accusation of violence or harassment will not be tolerated and any individual who makes a false accusation may be subject to disciplinary action, up to and including termination.

In the event of harassment or violence against Employees, the Company will inform the Employees about all available support during and after the complaints process.

The target/victim/affected individual has the right to be accompanied by a staff member or other third party in accordance with the company's policy during the formal or informal processes provided such person is reasonably available for the provision of support to the target/victim/affected individual.

The Company will provide training to all Internal compliant committee members, managerial and supervisory Employees with respect to understanding GBVH guidelines and how to handle complaints.

This Policy does not affect the rights of Employees to pursue complaints under the relevant laws of the appropriate jurisdiction.

Note: Under the POSH (Prevention of Sexual Harassment) policy, any harassment specifically related to sexual misconduct will be addressed according to its provisions. Harassment not covered by the POSH policy will fall under the Gender-Based Violence policy, If harassment type falls under both policy, it will be addressed under the POSH policy.

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