

Prevention, Prohibition and Redressal of Sexual Harassment at Workplace Policy

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I. Scope

The Prevention, Prohibition and Redressal of Sexual Harassment at Workplace Policy (“this Policy”) is effective **July 29th, 2025** and supersedes any previous policy or practice on employee harassment. The policy will cover the following-

1. All employees of HFCL, including regular, temporary or ad-hoc employees, probationers, apprentices and interns working with or without remuneration
2. All contract employees (directly employed or through agent) working on HFCL’s workplace
3. Customers, vendors, consultants and any others visiting HFCL’s workplace
4. Any other person as may be decided by the management

Sexual Harassment of any nature will be treated as a misconduct and unlawful as per the applicable Company policies.

This Policy provides protection against sexual harassment of women / those who identify themselves as women. Harassment is unlawful irrespective of who is involved in the behaviour. In the event that any person not protected by this Policy wishes to complain against any form of harassment including sexual harassment or sex based discriminations, he/she may complain in accordance with the Employee Grievance Redressal Policy.

Important Note: HFCL holds the sole prerogative to decide whether or not to cover an incident within the framework of this policy or provide assistance to the aggrieved as it deems fit.

II. Purpose

At Hero FinCorp Limited, it is our endeavour to promote a healthy and congenial working environment irrespective of gender, caste, creed or social class of the employees. We value every individual and are committed to protect the dignity and respect of every individual. Therefore, we have zero-tolerance for sexual harassment and any act of sexual harassment will invite serious disciplinary actions. This policy is meant to educate the employees and others about what conduct constitutes sexual harassment, the ways and means which we are adopting to prevent the occurrence of any such event, and in the unlikely chance of such occurrence, to enable a fair mechanism for dealing with such conduct.

This policy is made under the overall ambit of HFCL Code of Conduct and the Sexual Harassment of Women at Workplace (Prevention, Prohibition, Redressal) Act 2013 (“Act”). Sexual harassment of women at the workplace is unlawful and amounts to misconduct. All complaints made by aggrieved women to the Internal Complaints Committees (“ICC”) of HFCL in the manner provided herein and pursuant to the Act shall be addressed and dealt with in accordance with the law.

III. Definitions

- A. Workplace:** The workplace referred in this policy is not only restricted to office premises but also may include company vehicles, third party premises, off site meetings and office external venues or any other forum which may be defined as extended workplace by the Management & ICC. The workplace also includes the notional extended workplace during work from home and can also include cyber space and social media as well as electronic communication between persons covered under this policy which may have work-related consequences.
- B. Employer:** In relation to any department, organisation, undertaking, establishment, enterprise, institution, office, branch or unit of the appropriate Government or a local authority, the head of that department, organisation, undertaking, establishment, enterprise, institution, office, branch or unit or such other officer as the appropriate Government or the local authority, as the case may be, may by an order specify on this behalf. In relation to any workplace not covered by the aforesaid, employer means any person responsible for the management, supervision and control of the workplace.
- C. Employee:** A person employed at a workplace for any work on regular, temporary, ad hoc or daily wage basis, either directly or through an agent, including a contractor, with or, without the knowledge of the principal employer, whether for remuneration or not, or working on a voluntary basis or otherwise, whether the terms of employment are express or implied and includes a co-worker, a contract worker, probationer, trainee, apprentice or called by any other such name;
- D. Sexual Harassment:** Sexual Harassment as defined under the Sexual Harassment of Women at Workplace (Prevention, Prohibition & Redressal) Act, 2013 includes:
Any one or more of the following unwelcome acts or behaviour (whether directly or by implication) namely:
- a. physical contact or advances – or
 - b. a demand or request for sexual favours, or
 - c. Making sexually coloured remarks.
 - d. Showing pornography or
 - e. Any other unwelcome physical, verbal or non-verbal conduct of sexual nature. 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 also be sexual harassment: -
 - I. Implied or explicit promise of preferential treatment in employment;
 - II. Implied or explicit threat of detrimental treatment in employment;

- III. Implied or explicit threat about present or future employment;
- IV. Interference with work or creating an intimidating or offensive or hostile work environment; or
- V. Humiliating treatment likely to affect health or safety.

The following is an indicative list of conduct that could be considered sexual harassment:

- Turning work discussions to sexual topics, asking personal questions about sex life, sexual preferences, comments about sexual orientation or interest, marital life, partners etc.
- sexual advances or propositions
- Pestering for dates or receiving sexual suggestions or invitations
- Offering employment benefits in exchange for sexual favours
- Leering or eve-teasing
- Making sexual gestures or displaying sexually suggestive objects or pictures, cartoons, calendars or posters
- Making or using derogatory comments, comments about a person's body or dress, slurs, epithets or sexually suggestive jokes
- Written communications of a sexual nature distributed in hard copy or via a computer network, suggestive or obscene letters, notes or invitations
- Physical conduct such as touching, assault, impeding or blocking movements - Being kissed or hugged
- Making or threatening retaliation after a negative response to sexual advances or for reporting or threatening to report sexual harassment
- Sexually tinted remarks, including compliments on the attractiveness or body, clothes or makeup of the person, whistling, staring, sexually slanted and obscene jokes, jokes causing or likely to cause awkwardness or embarrassment
- Gender-biased insults and/or sexist remarks
- Displaying pornographic or other sexually offensive or derogatory material
- invitations for dates
- touch or assault or molestation
- All of the above apply to online communication as well, whether it is on meeting platforms, email or communication apps such as WhatsApp, Telegram or internal chat apps

Important Note: It is the impact or effect of the behaviour of the recipient and not the intent of the offender that is critical in an assessment of such issues/cases.

What Does Not Amount to Sexual Harassment:

If the interactions between the individuals are consensual, welcome, appreciated and/or reciprocated and within professional norms and the Code of Conduct, it does not amount to

sexual harassment. Any welcome behaviour that is based on mutual attraction, respect and/or friendship is not sexual harassment.

However, HFCL requires that any romantic relationships between co-workers, who are in any manner in senior/subordinate to each other in the HFCL Workplace, should be voluntarily disclosed at the first possible instance to their concerned HP representative. The onus of such disclosure shall lie upon the person who is professionally senior amongst the persons in the relationship. All such disclosures shall be held in the strictest of confidence and shall only be disclosed to the ICC for the purposes of an ongoing inquiry, if and when called upon. In the absence of disclosure, all such relationships may be considered as conflict of interest and where a complaint is made alleging that the relationship was entered into under duress, the same may be presumed.

- E. Aggrieved Woman:** In relation to a workplace, a woman, of any age whether employed or not, who alleges to have been subjected to any act of sexual harassment by the respondent.
- F. Respondent:** Person against whom the aggrieved woman has made a complaint.
- G. Special Educator:** A person trained in communication with people with special needs in a way that addresses their individual differences and needs.
- H. Internal Committee:** An independent Committee named 'Internal Complaints Committee' (ICC) has been formed under Section 4 of the Act to ensure prevention and redressal of all sexual harassment complaints.
 - 1. A Presiding Officer who shall be a woman employed at a senior level at workplace from amongst the employees. Provided that in case a senior level woman employee is not available, the Presiding Officer shall be nominated from other offices or administrative units of the workplace referred to in sub- section.
Provided further that in case the other offices or administrative units of the workplace do not have a senior level woman employee, the Presiding Officer shall be nominated from any other workplace of the same employer or other department or organization.
 - 2. Not less than two Members from amongst employees preferably committed to the cause of women or who have had experience in social work or have legal knowledge.
 - 3. One member from amongst non-governmental organisation or associations committed to the cause of women or a person familiar with the issues relating to sexual harassment.

Not less than 50 percent of the members shall be women.

All other Compliances relating to ICC shall be done by officials as authorised by the Board for adhering to Labour laws compliances and all other HP related compliances.

HFCL shall at all times, notify via the intranet/display of notices, names of the members who constitute the ICC, along with their contact numbers and email addresses. Any changes in the membership of the ICCs shall be duly notified. In the event that the merits of a particular case require additional caution or consideration, in the interest of a fair, objective and unbiased inquiry, HFCL may appoint “Special Members” to replace any or all of the members appointed to the Committees as above. Any such change in membership, or special appointments, shall be duly notified to the concerned parties in advance.

The Presiding Officer and every Member of the ICC shall hold Office for such period, not exceeding three years, from the date of their nomination as may be specified by the Board, which can be renewed as approved from the board from time to time to ensure the constitution of ICC(s) in accordance with the provisions of law.

IV. Reporting Sexual Harassment

All employees of the Organization have a responsibility to prevent or deter the commission of acts of sexual harassment in the workplace. Management and employees shall play a role in creating and maintaining a working environment in which sexual harassment is unacceptable. They shall ensure that their conduct does not cause offense to others and they shall discourage unacceptable behaviour on the part of others. Any employee who is the recipient of any unwelcome sexual behaviour as described by this policy or knows of the occurrence of such harassment to anyone else, is expected to report the same at the earliest.

A complaint must be submitted in writing to safeworkplace@herofincorp.com or to any member of the ICC (**refer Annexure: A**) in the specified format (**refer Annexure: B**). A complaint must be submitted within three months from the occurrence of the act of sexual harassment and in case of series of incidents, within a period of three months from the date of last incident. The ICC may extend the time limit for an additional period of three months, provided sufficient cause is recorded in writing explaining why the complainant could not file the complaint within the original time frame. In case the employee communicates verbally to his/her Team manager, HP Manager, or any other employee about any incident/s, they are encouraged to forward the complaint in writing to the ICC or email to safeworkplace@herofincorp.com.

In case of Incapacity, the complaint may be filed by her relative/friend/co- worker/any person who has the knowledge of the incident with the consent of her relative or friend can file the complaint.

In case of mental incapacity, the relative/friend/qualified psychiatrist or psychologist /any person who has the knowledge of the incident with the consent of her relative or friend can file the complaint.

Anonymous complaints are generally discouraged as details of people involved are essential to the formal investigation process.

V. Interim Measures During the Pendency of Inquiry

If the respondent is direct supervisor of the complainant, or person influencing the career growth of the complainant, the reporting structure will be changed till the time the inquiry is not completed. To ensure an unbiased inquiry, parties may also be placed on leave or any other relief to the aggrieved woman as deemed appropriate by the ICC.

VI. Resolution Process

The ICC, may, before initiating an inquiry and at the request of the aggrieved woman, take steps to settle the matter between her and the respondent through conciliation provided that no monetary settlement shall be made as a basis of conciliation.

The ICC shall provide the copies of the settlement as recorded, to the aggrieved woman and the respondent & no inquiry shall be conducted by the ICC.

In cases where a settlement is reached through conciliation, the ICC shall forward it to the Employer.

If settlement is not arrived through conciliation, the ICC will proceed with an inquiry. Inquiry shall be conducted in accordance with this Policy and the process provided herein which, for the purposes of Section 11 of the Act, are akin to the service rules applicable to all inquiry proceedings under the Act.

Upon initiation of inquiry, the complaint received shall be shared with the person complained against who shall be given 5 working days to respond to the same his/her explanation, names of witnesses and evidence, if any. The inquiry will be done promptly, thoroughly and with utmost confidentiality as practically possible. Meetings may be conducted through video conference, call or in person. Rules of natural justice shall be followed by the ICC, however, the parties shall not be allowed to be represented by a legal practitioner in the proceedings. Examination, cross examination and reexamination of the parties and witnesses shall be through written questions and the ICC shall take utmost care to avoid adversarial style of proceedings which may cause hostility between colleagues and impact the work environment. Confidentiality shall be maintained at all times. All submissions whether verbal or in writing made to the ICC will be treated to be made on oath. Upon completion of the inquiry, the ICC shall submit a report of its findings to the employer within 10 days of completion of the inquiry and such report shall also be made available to the concerned parties, as the case may be. The Company shall act upon the recommendation of the ICC within 60 days from the date of receipt of the report/recommendation.

Those found guilty will be subjected to appropriate disciplinary action. The disciplinary action that shall be commensurate with the nature of the gravity of the offence, shall include but not limited to,

1. Counselling
2. Warning (verbal or written)
3. Written apology from offender,
4. Bond of good behaviour
5. Transfer
6. Debarring from supervisory duties
7. Denial of employee benefits like increments/promotion/salary correction etc.
8. Cancellation of specific work Assignment
9. Suspension
10. Separation (non-stigmatic)
11. Dismissal

VII. Protection Against Retaliation

Retaliation is a serious violation of this policy and any person found to have retaliated against an individual for reporting harassment will be subject to appropriate disciplinary procedures.

If anyone feels that he/she is experiencing retaliation of the nature of intimidation, pressure to withdraw the case or threats for reporting, testifying or otherwise participating in the proceedings, should report the matter to the ICC.

As with complaints of harassment, this too will be treated as a misconduct and HFCL will take appropriate action to prevent/rectify the retaliation.

Retaliation will be treated as seriously as an alleged case of harassment and will apply even if the original complaint is not proven.

VIII. Appeals and Alternate Legal Remedies

For the inquiries conducted under the POSH Act 2013, any party wishing to make an appeal from the decision/findings/recommendations of the ICC may do so in writing to the Chief Human Potential Officer (CHPO) / MD & CEO of the Company. All appeals should be submitted within 90 days of the inquiry report being issued.

IX. Malafide/Malicious Complaint

Post inquiry into the complaint, if it is prima facie found that the complaint raised may be with malafide intent, a separate inquiry will be conducted by unrelated members into the same. The company can take the same disciplinary action as stated above against a person found guilty of such malafide complaint. Lack of evidence to support complaint does not indicate a malafide intention.

X. Aggrieved Person/Witnesses/Supporters Not to be Penalized

If a complaint of harassment is dismissed by the ICC under this policy, and proved that it was not made with any malicious intent, no action whatsoever may be taken in regard to the same against the aggrieved person/witnesses/supporters.

If during the course of an inquiry, it is found that witnesses/ supporters have lied under oath or placed falsified documents to mislead the inquiry, the same may be treated as misconduct and disciplinary actions may be recommended where necessary.

XI. Confidentiality

HFCL will exercise utmost care in ensuring confidentiality of the process, protection of the victim/harassed and treat the entire process with dignity & merit it deserves. Breaches of confidentiality which are found to have taken place may result in the same disciplinary actions as stated above.

XII. Consensual Romantic/Sexual Relationships

HFCL discourages romantic/sexual relationships between a member of management or other supervisory employee and his or her staff (an employee who reports directly or indirectly to that person), because such relationships tend to create compromising conflicts of interest at work.

It is therefore in the best interest of all concerned, that if there is such relationship, the involved parties notify management so the reporting chain can be changed to encase no direct or indirect reporting relationship.

XIII. General Guidelines

All employees at HFCL have a responsibility in contributing to a mature and respectful work environment. With this view, HFCL shall undertake all reasonable measures to educate its employees on the provisions of the Act and organise regular training and sensitisation sessions about the policy among its employees. The coverage and frequency of these sessions will be as decided by HFCL HP Department.

All employees are personally responsible for their actions and must ensure that their behaviour does not constitute sexual harassment whether it happens deliberately or otherwise.

HFCL reserves the right to modify and amend the provisions of this Policy, to comply with applicable legal requirements, internal policies, or with a view to fine tune or alter the provisions of this Policy to the extent deemed necessary by HFCL from time to time.

This Policy shall be applicable and will be in addition to and not in derogation of the provisions of any other policy and service rules for the time being in force within the organisation

Through various training and awareness sessions HFCL will make employees aware of their roles and responsibilities in implementation of this policy.

XIV. Annual Reporting

Annual report summarizing complaints and redressal of Sexual harassment shall be prepared by designated person and submitted to respective authorities. The return shall also include the cases received from persons identifying as women.

The Annual Report shall have the following information:

1. Number of complaints of sexual harassment received in the year;
2. Number of complaints disposed off during the year;
3. Number of cases pending for more than 90 days;
4. Number of workshops or awareness programme against sexual harassment carried out;
5. Nature of action taken by the employer or District Officer

The said report as well as all documents regarding Sexual Harassment complaints shall be kept in the safe custody of the ICC.

Annexure: A

Member List of Internal Committee (s) across all locations as on 29 th July '2025			
Committee Member Name	Designation	Contact No.	Email ID
Ms. Ritu Sharma	Presiding Officer	8527596810	ritu.sharma@herofincorp.com
Mr. Shivendra Suman	Member	9867785405	shivendra.suman@herofincorp.com
Ms. Puja Wig Vachher	Member	9810369749	puja.vachher@herofincorp.com
Ms. Monica Arora	Member	8527099662	monica.arora@herofincorp.com
Ms. Suramyan Dixit	Member	8527554138	surayman.dixit@herofincorp.com
Ms. Ankur Agarwal	Member	8527554138	ankur.agarwal1@herofincorp.com
Ms. Paarul Agarwal	Member	9818960361	paarul.agarwall@herofincorp.com
ADV. Devika Singh	External Member	9818960361	devika.singh@cohereconsultants.com
AVD. Shivkami Ramachandran	External Member	8800664777	shivakami@cohereconsultants.com
Ms. Sairekha Suresh, Lawyer	External Member	8904447004	sairekha@cohereconsultants.com

Annexure: B

FORM FOR COMPLAINT

Date:

Name, designation & location of victim(s)/aggrieved:

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Name, designation & location of respondents:

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Complaint:

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Signature:

Contact No/Mail ID:

Human Potential
**HFCL - HR – PL15- Prevention, Prohibition and
Redressal of Sexual Harassment at Workplace Policy**

Sr. No.	Version	Date	Change	Section	Updated By	Approved By
1	2.0	1-Apr-17	Initial Draft	All	Ritu Sharma – Lead-Human Resources	MD & CEO & Board of Directors
2	2.1	1-Nov-17	Change in ICC- Due to Separation of Employee	Change in ICC(Internal Complaint Committee)	Ritu Sharma – Lead-Human Resources	MD & CEO & Board of Directors
3	2.2	1-Jan-19	Change in ICC- Due to Separation of Employee	Change in ICC(Internal Complaint Committee)	Ritu Sharma – Lead - Human Resources	MD & CEO & Board of Directors
4	2.3	25-May-20	Amendments due change in Act & change in work environment (WFH)	Definitions & Resolution Process	Ritu Sharma – Lead - Human Resources	MD & CEO & Board of Directors
5	2.4	21-Oct-20	Amendments due change in Act & change in work environment (WFH)	Resolution Process	Ritu Sharma – Lead - Human Resources	MD & CEO & Board of Directors
6	2.5	1-Oct-21	Change in email id	Reporting of Sexual Harassment	Ritu Sharma – Head HR Operations & Off Roll Management	MD & CEO & Board of Directors
7	2.6	14-Oct-22	Change in ICC List	Annexure A	Ritu Sharma – Head HR Operations & Off Roll Management	MD & CEO & Board of Directors
8	2.7	1-Mar-23	Change in ICC List	Annexure A	Ritu Sharma – Head HR Operations & Off Roll Management	MD & CEO & Board of Directors
9	2.8	5-Feb-24	Amendment in clause – Internal Compliant Committee	Annexure A	Ritu Sharma – Head HR Operations & Off Roll Management	MD & CEO & Board of Directors

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Redressal of Sexual Harassment at Workplace Policy**

11	2.9	29-Jul2025	Amendments in Scope, Purpose, Reporting Sexual Harassment, Interim Measures during the Pendency of Inquiry Resolution process, Appeals and Alternate Legal Remedies and Annual Reporting	Clause I, II, IV, V, VI, VIII and XIV, Annexure -A	Ritu Sharma – Head - People Operations & Emp. Experience - Human Potential	Board of Directors
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