

Policy for Prevention and Redressal of Sexual Harassment at Workplace



Table of Contents

Section 1: Preamble & Purpose / Scope.....	3
Section 2: Applicability.....	3
Section 3: Definitions	3
Section 4: Types of Sexual Harassment.....	4
Section 5: Reporting	5
Section 6: Internal Committee.....	5
A. Constitution:	5
B. Duties of Internal Committee:	6
C. Complaint Mechanism:.....	6
Section 7: Enquiry Proceedings:	7
Section 8: Rules of Evidence:	9
Section 9: Issuing Interim Orders:.....	9
Section 10: Findings and Directions:.....	9
Section 11: Punitive Actions of Internal Committee.....	10
Section 12: Confidentiality:	10
Section 13: Protection against Retaliation:.....	10
Section 14: Complaints made with a Malicious Intent:	11
Section 15: Appeal:.....	11
Section 16: Other points to be considered:	11
Section 17: Department in charge	11
Section 18: Revision and abolishment.....	11
Annexure A: Format for Reporting Sexual Harassment Complaints.....	12
Annexure B: Internal Complaints Committee Members	13



Section 1: Preamble & Purpose / Scope

This policy is formulated in accordance with the provisions of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (the Act), which provides to protect against sexual harassment of women at workplace and for the prevention and redressal of complaints of sexual harassment and for matters connected therewith or incidental thereto.

Where sexual harassment occurs 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/victim in terms of support and preventive action.

The purpose of this policy is mentioned as under:

- a) To define sexual harassment;
- b) To understand what may be constituted as sexual harassment and unwanted behavior;
- c) To lay down the guidelines for reporting acts of Sexual Harassment in Workplace; and
- d) To provide the procedure for the resolution and redressal of complaints of Sexual Harassment in a time bound manner.

Section 2: Applicability

AEON Credit Service India Private Limited (ACSI / the Company), has framed this Policy, which is applicable to all the Employees irrespective of their level, rank or designation across all departments, functions, operations, units, meeting centers and branch offices of AEON Credit Service India Private Limited and is deemed to be incorporated in the service conditions of all the Employees and comes into effect forthwith.

Section 3: Definitions

For the purpose of this Policy the following definitions shall be applicable:

- a) **“Company / ACSI”** shall mean AEON Credit Service India Private Limited.
- b) **“Internal Committee”** shall mean an Internal Complaints Committee (ICC) constituted for redressal of complaints of Sexual Harassment by the affected person/victim and make recommendations for resolution to the Management Team.
- c) **“Employee”** shall mean 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) **“Management Team”** shall mean the person/s vested with the powers to take appropriate action for implementing the decision of the Internal Committee and shall consist of such officers as designated by the Company from time to time;
- e) **“Sexual Harassment”** includes any such unwelcome sexually determined acts or behavior (whether directly or by implication) by any employee irrespective of gender in any form as defined in section 4.
 - i) physical contact and advances;



- ii) a demand or request for sexual favors;
 - iii) sexually colored remarks;
 - iv) showing pornography;
 - v) 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 amount to sexual harassment: -

- i) implied or explicit promise of preferential treatment in their employment; or
 - ii) implied or explicit threat of detrimental treatment in their employment; or
 - iii) implied or explicit threat about their present or future employment status; or
 - iv) interference with their work or creating an intimidating or offensive or hostile work environment for them; or
 - v) humiliating treatment likely to affect their health or safety.
- f) **“Third Party”** means any person or persons not on the rolls of the Company but, in the course of work-related activities, interacting with the Company.
- g) **“Work Place”** shall mean any place(s) where an affected person/victim or defendant is employed or works, or visits in connection with their duties during the course of or arising out of their employment.
- h) **Respondent:** A person against whom a complaint of sexual harassment has been made by the aggrieved woman under this policy.

Section 4: Types of Sexual Harassment

Four broad instances/categories of Sexual Harassment are listed below. These are indicative and not comprehensive.

A) Physical Harassment:

- i) Physical contact and advances;
- ii) Intentional touching, pinching, grabbing, brushing against another’s body;
- iii) Sexual assault;
- iv) Eve teasing, physical confinement against one’s will;
- v) Cornering, trapping or blocking a person’s pathway;
- vi) Excessively lengthy handshakes;
- vii) Any physical conduct which is unwelcome;
- viii) Forcible physical touch or molestation.

B) Verbal Harassment:

- i) A demand or request for sexual favors either explicitly or implicitly in return for employment, increment, promotion, evaluation of a person towards any activity;
- ii) Sexually colored remarks;
- iii) Making sexually suggestive or off-color comments; threats; slurs; sexual propositions, kissing sounds, etc.;
- iv) Sexual jokes or teasing: misogynist humor; sexually colored gender specific jokes;
- v) Comments about how someone looks, especially about parts of the body;
- vi) Catcalls, whistles and forms of address like “honey”, “sweetheart”, etc.;
- vii) Jokes, phone calls causing or likely to cause awkwardness or embarrassment;
- viii) Gender based insults or sexist remarks;



- ix) Unwelcome sexual overtone in any manner such as over telephone (obnoxious telephone calls) and the like;
- x) If anybody makes intrusive enquiries into the private lives of employees or persistently asking that individual out.

C) Gestural Harassment:

- i) Leering or staring at another's body;
- ii) Sexually suggestive gesturing.

D) Written/Graphic Harassment:

- i) Showing pornography;
- ii) Display of pornographic material with an Employee as the target;
- iii) Written material that is sexual in nature such as letters/emails/SMS or notes containing any sexual content;
- iv) Displaying sexually visual material such as pinups, cartoons, graffiti, computer programs, catalogues of sexual nature.
- v) Any harassment via social media or virtual platforms including official or unofficial emails and messaging services.

Section 5: Reporting

If a person is being sexually harassed, they should:

- a) Tell the accused that their behavior is unwelcome and ask them to stop;
- b) Keep a record of incidents (dates, times, locations, possible witness, what happened, victim's response). It is not mandatory to have a record of events to file a complaint, but a record can strengthen the victim's case and help the victim remember the details over time, in case the complaint is not filed immediately;
- c) File a formal complaint as soon as possible in accordance with the terms of the Policy.

Section 6: Internal Committee

The Internal Committee of ACSI should be the first point of contact for all Sexual Harassment complaints.

A. Constitution:

- i) Internal Committee shall be constituted at all administrative units or offices.
- ii) The Internal Committee shall consist of not less than four members;
- iii) Not less than half of its members shall be women;
- iv) Regional Internal Committee shall have at least one local member.
- v) The Internal Committee shall be headed by a women employed at senior level who shall be its Presiding Officer;
- vi) To prevent the possibility of any undue pressure or influence from senior levels, the Internal Committee shall involve a third party, either non-governmental organization (NGO) or other body who is familiar with the issue of sexual harassment and complies with the requirement as mentioned in the Act;
- vii) The Presiding Officer and every Member of the Internal Committee shall hold office for such period, not exceeding three years, from the date of their nomination as may be specified by the employer.



- viii) Removal or addition of an Internal Committee member takes place:
Where the Presiding Officer or any Member of the Internal Committee, —
- (a) Violates Section 16 of the Act or breaches confidentiality; or
 - (b) has been convicted for an offence or an inquiry into an offence under any law pending against them; or
 - (c) has been found guilty in any disciplinary proceedings or disciplinary proceeding is pending against them; or
 - (d) has abused their position as to render continuance in office prejudicial to the public interest, such Presiding Officer or Member, as the case may be, shall be removed from the Committee and the vacancy so created or any casual vacancy shall be filled by fresh nomination in accordance with the provisions of the Act.
- ix) For the purpose of making an inquiry under section 11, sub-section (1) of Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, the Internal Committee, as the case may be, shall have the same powers as are vested in a civil court under the Code of Civil Procedure, 1908(5 of 1908) when trying a suit in respect of the following matters, namely: --
- (a) summoning and enforcing the attendance of any person and examining them on oath;
 - (b) requiring the discovery and production of documents: and
 - (c) any other matter which may be prescribed.
- x) The details of the Internal Committee members and their contact details for all administrative units and offices is provided in Annexure B.

B. Duties of Internal Committee:

The Internal Committee shall have the following duties:

- i) To promote and facilitate measures taken by Company for the prevention and redressal of complaints of Sexual Harassment and for sensitization regarding the same;
- ii) To carry out an enquiry into complaints of Sexual Harassment referred to it or brought to its notice; and
- iii) To ensure that affected persons/victims, or witnesses are not victimized or discriminated against while dealing with complaints of Sexual Harassment.

C. Complaint Mechanism:

1) Through Internal Committee:

- i) An affected person/victim may prefer a complaint before the Internal Committee within 3 months from the date of incident and in case of continuing incidents, within 3 months from the date of last incident as per the format prescribed under **Annexure A** at wecare@aeoncredit.co.in or email id of any member of the Internal Committee or any person designated by the Company to receive complaints. Alternatively, a victim/affected person can also send their complaint as per the said format at the following address:
Sexual Harassment Internal Committee,
AEON Credit Service India Private Limited,
TF-A-01, 3rd Floor, A Wing, Art Guild House,
Phoenix Marketcity, LBS Marg, Kurla (West),
Mumbai – 400 070.
- ii) In case of death of an aggrieved Employee the complaint may be filed by their legal heir/ representative;



- iii) The complaint shall be addressed to the Internal Committee and shall contain all the material and relevant details concerning the alleged Sexual Harassment including the names of the contravener and the complainant.
- iv) The complaint can be lodged at the email id/address provided under sub-clause (i) above or with any member of the Internal Committee or any person designated to receive complaints;
- v) Complaints should be made in writing. In case of verbal/oral/any complaint in other languages, it shall be duty of the Presiding Officer to assist the complainant in drafting a written complaint and signature from them with date has to be obtained.
- vi) Where the conduct of Sexual Harassment amounts to a specific offence under the or under any other law, it shall be the duty of member of the Internal Committee who receives such a complaint to immediately inform the complainant of their right to initiate criminal proceedings against the accused and shall assist the victim to take an appropriate action in accordance with law;
- vii) The Internal Committee will endorse the complaint received by it and keep the contents confidential except to use the same for discreet investigations.

II) Through SHe-Box Portal

- i) Registration on SHe-Box Portal: Complainants can now register the complaint on to <https://shebox.wcd.gov.in/privateComplaint>. Upon successful registration, complainants will be granted access to the portal to file their complaints.
- ii) Login to the Portal: Once registered, complainants will use their credentials to log in to the SHe-Box portal.
- iii) Complaint Submission: After logging in, the portal will prompt the complainant to provide detailed information about the incident(s), including the nature of the complaint, the individuals involved, and any evidence or documentation available.
- iv) Review and Confirmation: The complainant will have the opportunity to review the information provided before submitting. Once confirmed, click "Submit" to complete the filing process.
- v) Acknowledgment of Complaint: Upon submission, the complainant will receive an automatic acknowledgment confirming receipt of their complaint and information regarding the next steps.
- vi) Follow-Up and Status Updates: Complainants can track the complaint on the SHe-Box portal about the status of their complaint, including any further required actions or investigations.
- vii) After the complaint is filed by the complaint on SHe-Box portal, the Nodal Officer (Presiding Officer of the Internal Committee) will be notified by the government.

Section 7: Enquiry Proceedings:

- i) On receipt of the complaint, the Presiding Officer of the Internal Committee shall from the date of receipt of the complaint or as soon as reasonably possible, call a meeting of the Internal Committee to meet the affected person/victim who has made the complaint and record their statement made at such a meeting;
- ii) The Internal Committee shall hear the affected and record their allegations. The affected person/victim may also submit any corroborative material with documentary proof, oral or written material, etc., to substantiate their complaint. If the affected



person/victim does not wish to depose personally due to embarrassment of narration of event, an IC member, women officer for lady employees involved and a male officer for male employees involved, shall meet and record the statement;

- iii) After the meeting with the affected person/victim, and on satisfaction of the existence of a prima facie case of Sexual Harassment, the Internal Committee shall call for a meeting **within the next 7 working** days or as soon as reasonably possible;
- iv) Thereafter, the person against whom a complaint is made shall be called for a meeting before the Internal Committee and an opportunity will be permitted to them to offer an explanation.
- v) Conciliation:
 - a) Before initiating an inquiry and at the request of the Complainant, the IC may take steps to settle the matter between them and the respondent through conciliation, provided that no monetary settlement shall be made a basis of conciliation.
 - b) If a settlement has been arrived at, the IC needs to record the settlement and forward the same to the employer/ the Company to take action as specified in the recommendation.
 - c) The IC needs to provide the copies of the settlement, as recorded, to the Complainant and the respondent.
 - d) Where a settlement has been arrived at, no further inquiry needs to be conducted by the IC.
- vi) However, in the event;
 - a) Where no conciliation is requested for by the Complainant, or
 - b) no settlement has been arrived at between the parties, and/or
 - c) if the Complainant informs the IC that any term or condition of the Settlement arrived at earlier has not been complied with, then, the IC, in the above situations, needs to proceed to inquire into the complaint.

The IC shall from the completion of any mediation process, and whose progress or conclusions are found not acceptable to either the complainant or the respondent, proceed to conduct a full enquiry into the allegation of sexual harassment and complete the enquiry within 90 days from the date of receipt of the complaint.

vii) The enquiry procedure would be as follows:

- a) The Internal Committee shall prepare and issue a formal written complaint containing definite and distinct articles of charge, which shall include:
 - 1. A statement of the imputations of misconduct or misbehavior in support of each article of charge, which shall contain a statement of all relevant facts including any admission or confession made by the defendant.
 - 2. A list of documents by which, and a list of witnesses by whom, the articles of charge are proposed to be sustained.
- b) The Internal Committee shall arrange to deliver the written complaint to the defendant and shall require the defendant to submit an explanation within ten working days from the receipt of the charge-sheet, a written statement of their defense and supporting documents and witnesses, if any;
- c) All documents tendered to the Internal Committee shall be taken on record by it



- and given an exhibit number;
- d) At the commencement of the enquiry proceedings the Internal Committee shall explain the procedure which will be followed in the enquiry, to both the complainant and defendant;
- e) Firstly, the evidence and witnesses of the affected person/victim shall be recorded. After the completion of the evidence and examinations, the evidence of the defendant and their witnesses shall be recorded. Sufficient opportunity shall be given to examine all witnesses notified by both the parties.
- f) The Internal Committee shall ensure that every reasonable opportunity is extended to the affected person/victim and the defendant, for putting forward and defending their respective cases.
- g) The venue of the enquiry shall be decided by the Internal Committee.
- h) The Internal Committee shall complete the enquiry within reasonable period but not beyond 90 days and communicate its findings and its recommendations for necessary action to the Management Team.
- i) The report of the Internal Committee shall be treated as an enquiry report on the basis of which appropriate disciplinary action shall be taken by the Management Team as per the findings and recommendations of the Internal Committee.
- j) On the completion of the enquiry, the IC will submit a written report to the Company within a period of 10 days from the date of completion of the enquiry and made available to the concerned parties.

Section 8: Rules of Evidence:

In conducting an enquiry, the Internal Committee:

- i) shall be sensitive to the covert, private and insidious nature of Sexual Harassment and shall take into account that often the affected person/victim may not be able to lead direct or corroborative evidence;
- ii) shall not permit any evidence or examination based on the aggrieved person's character, personal life, conduct, personal and sexual history;
- iii) shall take note of the respective socio-economic positions of the parties, their hierarchy in the Company and other power differences while appreciating the evidence;
- iv) shall disallow any questions desired to be put by the defendant to the aggrieved person which it feels are derogatory, irrelevant or slanderous to the affected person/victim;
- v) Can allow the affected person/victim to give their answers to questions of a sensitive nature in writing immediately in the enquiry proceedings during cross examination.

Section 9: Issuing Interim Orders:

The Internal Committee if so required may issue appropriate Interim orders from time to time recommending the Management Team to issue orders as may be necessary to ensure the safety of the victim or witnesses.

Section 10: Findings and Directions:

On the completion of an enquiry by the Internal Committee, the Internal Committee may recommend a detailed and reasoned order, which may include:



- i) Recommendation to the Management Team on appropriate disciplinary action as per the Disciplinary Policy /terms of employment, commensurate with the gravity of the offence of which the person has been found guilty of;
- ii) Recommendation to the Management Team on steps necessary and reasonable to assist the affected person/victim in terms of support and preventive action where Sexual Harassment has occurred as a result of an act or omission by any Third Party or outsider.
- iii) Recommending to the Management Team appropriate disciplinary action against the person making the complaint, in case the complaint registered is found to be false or was made with a malicious intention.
- iv) Dismissing the complaint.

Section 11: Punitive Actions of Internal Committee

As per Section 19(b) and Section 19(h) read with section 13(3) of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and depending upon the severity of the incident and as may be recommended by the Internal Committee, the Company shall take appropriate actions, which may include but shall not be limited to:

- i. Any one or more of the following disciplinary actions:
 - a) Submission of a written apology; or
 - b) Undergoing a counselling session or carrying out community service; or
 - c) Issuing a written warning, reprimand or censure; or
 - d) Withholding of promotion, pay rise or increment; or
 - e) Terminate the employment
 - f) Community Service
- ii. Deduction from the salary or wages of the accused such sum as it may be considered appropriate to be paid to the aggrieved person or to their legal heirs; and / or
- iii. Appropriate action under the Indian Penal Code, 1860 / BNS Act 2023.

Section 12: Confidentiality:

- i) Information generated in the course of informal reviews and formal investigations necessary for enforcing this Policy will be given the full extent of confidentiality to Employee personnel records. Any person who, without authorization, reveals such information will be subject to disciplinary action.
- ii) The sharing of the content of the complaints will be on a “need to know” basis only. It is understood that sexual harassment is an issue of highly sensitive nature and therefore strict confidentiality will be maintained by the affected person/victim (the Complainant), defendant, witnesses, the Internal Complaints Committee members and the Management Team.

Section 13: Protection against Retaliation:

Regardless of the outcome of the complaint made in good faith, the affected person/victim lodging the complaint and any person providing information or any witness, will be protected from any form of retaliation. While dealing with complaints of Sexual Harassment, the Internal Committee shall ensure that the affected person/victim or the witness are not victimized or discriminated against by the accused. Any unwarranted pressures, retaliatory or any other type of unethical behavior from the accused against the affected person/victim while the

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investigation is in progress should be reported by the affected person/victim to the Internal Committee as soon as possible. Disciplinary action will be recommended by the Internal Committee to the Management Team against any such complaints.

Section 14: Complaints made with a Malicious Intent:

The Policy has been evolved as a tool to ensure that in the interest of justice and fair play, Employees have a forum to approach in the event of instances of Sexual Harassment. However, if upon investigation the Complaint is found to be frivolous or false or it is revealed that the complaint was made with a malicious intent and with the motive of maligning the concerned individual/tarnishing their image and to settle personal/professional scores, appropriate disciplinary action will be taken against the complainant. The persons who are victims of such frivolous or false Sexual Harassment complaints may, in addition to the above, seek legal remedies as may be provided under the various laws for the time being in force.

Section 15: Appeal:

Any party not satisfied or further aggrieved by the implementation or non-implementation of recommendations made, may appeal to the appellate authority in accordance with the Act, within 90 days of the recommendations being communicated.

Section 16: Other points to be considered:

- (i) The Management Team will execute an appropriate action in accordance with the recommendation proposed by the Internal Committee;
- (ii) The Management Team shall provide all necessary assistance for the purpose of ensuring full, effective and speedy implementation of this Policy;

Section 17: Department in charge

The Department in charge of handling this policy shall be HR & Administration Department.

Section 18: Revision and abolishment

Revision and abolishment of this policy shall be planned and proposed by the HR & Administration Department.

Revision and abolishment of this policy requires an appropriate resolution to that effect passed at a Board of Director' Meeting. The organization shall review this policy annually or as and when required pursuant to the changes in laws/business environment or strategy or developments of Policy of Policy control.



Annexure A: Format for Reporting Sexual Harassment Complaints

To,

The Sexual Harassment Internal Committee

AEON Credit Service India Private Limited, TF-

A-14, 3rd Floor,

A Wing, Art Guild House,

Phoenix Market city, LBS

Marg, Kurla (West),

Mumbai – 400 070.

Sexual Harassment details:

[You may attach additional sheets if necessary to provide the details]

a. Person/people involved in Sexual Harassment:

[Please provide the name(s), designation, location(s), and relationship with you
(e.g. supervisor, colleague, etc.)]

b. Critical incidents and factual data:

Please describe the
incident/s:

Your response to the incident/s:

c. Other material and relevant details:

[Please provide date/s, place/s of the incident/s, witnesses, if any, details of text
messages, emails, if any, etc.]

Name of the person(s) reporting: _____

Date: _____

Location: _____

Department: _____

Contact Information: _____

(mention official e-mail id, cell no., _____

contact no, office address) _____

Signature: _____

Place: _____



Annexure B: Internal Committee Members

The Presiding Officer: Ms. Sushama Dinesh Desai

Complaint Email ID: wecare@aeoncredit.co.in

Committee Members:

Sr. No.	Committee Members	Email ID	Contact No.
1	Ms. Sushama Dinesh Desai	sushama_desai@aeoncredit.co.in	7738216075
2	Mr. Joyjeet Amal Dasgupta	joyjeet_dasgupta@aeoncredit.co.in	8108163109
3	Mr. Amit Koyande	amit_koyande@aeoncredit.co.in	9987912343
4	Ms. Vaishali Suyog Parab	vaishali_sawant@aeoncredit.co.in	9773537128
5	Ms. Sushma Manish Rana	sushma_rana@aeoncredit.co.in	9004456805
6	Dr. Medha Shetye	medha@LexiPOSH.com	9869253508

Members for complaints related to the respective locations:

Sr. No.	Committee Members	Email ID	Contact No.
1	Mr. Rajender Kumar Sharma	rajender_sharma@aeoncredit.co.in	9810903174
2	Mr. Balu R S	balu_rs@aeoncredit.co.in	9544854445

The Committee Members from other Branches shall form part of the members of the IC. They shall be included in the proceedings in the event that an incident arises pertaining to the location where they are operative. It is clarified that the members shall be invited to be a part of the IC only if the incident/complaint pertains to any staff operative at the said locations or the incident takes place at the said locations.

Management members

The Managing Director & Executive Directors will be the management members for the POSH Committee.