



Policy on Prevention and Redressal of Sexual Harassment at Workplace

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1. Introduction

IIFL Sales (hereafter 'Company') is an equal opportunity employer. It is our endeavor to create a culture of conducive, fair and harmonious environment amongst its employees and in the company. The employees have the right to work in an environment free from all forms of discrimination and conduct basis caste, creed, religion, race, region, gender, etc. which can be considered harassing, coercive, or disruptive, including sexual harassment. The Company recognizes its responsibility towards safeguarding and protecting its employees from harassment either by an internal or external source at workplace and is committed to provide and ensure a safe, harassment free working environment to all its employees.

2. Preface

Sexual harassment results in violation of the fundamental right of an equality, under Articles 14 and 15 of the Constitution of India; right to live with dignity, under Article 21 of the Constitution; and their right to practice any profession or to carry on any occupation, trade or business in a safe environment that is free from sexual harassment.

3. Objective

The Sexual Harassment of Women at Workplace (Prevention, Prohibition & Redressal) Act, 2013, aims to provide protection against sexual harassment to women, at the workplace, and prevent and redress complaints of sexual harassment and matters connected therewith and incidental thereto.

Keeping this in mind and being an equal opportunity employer, the Company has formulated a gender neutral Policy on the Prevention & Redressal of Sexual Harassment of Employees at the Workplace. All employees are required to be aware of this policy and to note the consequence of not complying with it.

4. Applicability

This policy is applicable to all persons employed at IIFL Sales, for any work, on a regular, temporary, ad-hoc or daily wage basis, either directly or through an agent, including a contractor, a coworker, a contract worker, probationer, trainee, apprentice or called by any other such name. For the purpose of this policy, all those covered by this policy are hereinafter referred to as "employee (s) / associate (s)".

5. Policy Guidelines

5.1 Constitution of committee

An Internal Committee has been constituted at the Company, where at least 50% of the members so nominated shall be women at all times.

- Minimum 3 members including presiding officer shall be present to form Quorum for conduct of the inquiry.
- One member shall be from the NGO as mentioned in The Sexual Harassment of Women at Workplace (Prevention, Prohibition & Redressal) Act, 2013.
- Presiding Officer and every member of the Committee shall be in office for a period not exceeding 3 years.

5.2 Sexual Harassment Redressal System

While all employee (s) /associate (s) should adhere to decent behavior and do not conduct themselves in the manner, as stipulated above, in the unlikely event of any employee / associate violating the same, the Redressal System is as follows:

(i) Internal Committee (IC):

An Internal Committee (IC) for the Company was constituted on 6th June 2024 pursuant to the provisions of the Law and updated to the below on 5th Jan 2026.

Member Name	Role	Contact Number	Email ID
Aarti Marwaha	Presiding Officer	9953011355	aarti.marwaha@iiflhomeloans.com
Manoj Kumar	Member	9711559503	kumar.manoj@iiflhomeloans.com
Gunjan Malik	Member	9717990775	Gunjan.malik@iiflhomeloans.com
Viji Hari	External Member	9840171717	viji@cecareus.com
S.V.Jagadeeswar Gupta P	Member- South	8328054235	svjagadeeswar.pusarla@iiflhomeloans.com
A.Hemamalini	Member – South	9962400510	ahemamalini@iiflhomeloans.com
Swetha Damavarapu	Member – South	9052122777	swetha.damavarapu@iiflhomeloans.com
Dhiraj Revaji Rathod	Member – West	9967575965	dhiraj.rathod@iiflhomeloans.com
Naina Gupta	Member – West	8859824072	naina.gupta@iiflhomeloans.com
Dhanashree Sawai	Member – West	8450905786	ghanashree.sawai@iiflhomeloans.com

(ii) How to File Complaint:

- To enable easy access to the Committee, a dedicated e-mail ID posh.hfc@iiflhomeloans.com has been set up for receiving complaints under this policy.

- A written complaint may be submitted by post by sending it to the following address:
IIFL Home Finance Ltd, Plot No. 98, Udyog Vihar, Phase IV, Gurugram, Haryana – 122015.

(iii) Tenure of IC:

Members of the Internal Committee will hold office for a period of 3 years from the date of their nomination.

(iv) Scope of IC:

- To hear and inquire into complaints of sexual harassment
- To recommend the punitive / corrective actions to the Management

(v) Powers of IC:

For the purpose of making an inquiry the IC shall have the same powers as are vested in a civil court as per the Code of Civil Procedure, 1908 (5 of 1908) when trying a suit in respect of the following matters:

- Summoning and enforcing the attendance of any person and examining them on oath
- Summoning witnesses or documents for finding facts
- Recording the statements of all the people appearing before them and taking their signatures.

While dealing with the complaint, IC will ensure strict confidentiality, to the maximum extent possible, and all information shall be restricted to the concerned members only.

6. Complaints and Redressal Procedure

- Any aggrieved employee may make, by drafting an initial e-mail to the dedicated e-mail ID, a complaint of sexual harassment at workplace to the IC, within a period of three (03) months from the date of incident, and in case of a series of incidents, within a period of three (03) months from the date of last incident. In the alternative, the aggrieved can also reach out to an IC member or write an email to them or raise their concerns with the HRBP who shall then transfer the complaint to the IC. The Internal Committee may, for the 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 aggrieved person from filing a complaint within the said period.
- An “aggrieved person” refers to a person, of any age, whether employed or not, who alleges to have been subjected to any act of sexual harassment by the Respondent.
- If the aggrieved employee is unable to make a complaint on account of their physical or mental incapacity, death or otherwise, their legal heirs may make a complaint subject to the relevant provisions as mentioned under the Law.

6.1 Conciliation

Before initiating an inquiry and at the request of the Complainant the IC will take steps to resolve the matter through conciliation. The proceedings will be recorded in writing. No settlement for monetary compensation will be carried out. A copy of such a settlement will be provided to the employer, the complainant and the respondent. If a settlement has arrived, no further inquiry will be conducted by the Internal Committee.

6.2 Inquiry

- (i) In case no settlement is arrived at, or the settlement arrived at in conciliation is not complied with, then the matter will be inquired by the IC. The same will be communicated to the complainant and the respondent.
- (ii) The Internal Committee will conduct the inquiry following the principles of natural justice. The inquiry shall be completed within ninety (90) days from date of receipt of complaint.
- (iii) Both the complainant and respondent will be given adequate opportunity to explain their sides in the case and cross-examine the other party and their witnesses.
- (iv) The complainant or the respondent to the complaint shall not be allowed to bring any legal practitioner to represent them at any stage of the proceedings before the IC.
- (v) In the event of a failure to attend a personal hearing before the IC by the complainant or the respondent on three consecutive dates (intimated in advance), the IC shall terminate the inquiry proceedings or give an ex-parte decision. However, the IC shall serve a notice in writing to the party(ies) 15 days in advance, before such termination or the ex-parte order.
- (vi) The IC will prepare and submit the inquiry report along with its findings and recommendations to the employer within 10 days from the completion of the inquiry. A copy of the inquiry report along with the IC's recommendations is shared with the complainant and respondent.
- (vii) Employer will implement the recommended actions within 60 days from receipt of the inquiry report.
- (viii) In case the complainant communicates her desire to file a complaint with the police before, during or after the inquiry, the IC will support her to do so.

6.3 Interim Relief

During pendency of inquiry, based on the requests made by the complainant, the IC may allow interim relief which could include:

- Preventing the respondent from assessing the complainant's work performance
- Permitting paid leave to the complainant for a maximum period of 3 months, in addition to the leave that the employee is entitled to.
- Transfer the complainant/respondent to a different location.
- Other relief as may be appropriate.
- The final decision, however, is left solely at the discretion of IC.

6.4 Recommendations

After the conclusion of the inquiry, if the Respondent is found guilty of sexual harassment, the IC shall recommend punitive actions against them which may include:

- Suspension
- Termination
- Written warning
- Withholding promotion and/or increments
- Apology to be tendered by respondent
- Censure or reprimand
- Counselling
- Or any other action that the IC may see fit.

6.5 False Complaints

If the IC arrives at the conclusion that the complainant or any other person has made allegations that are malicious or has produced forged or misleading documents/evidence, it may recommend to the employer to take action against the person for making false allegation which can be similar to the recommendations that can be made by the IC against the Respondent in case of they being found guilty.

6.6 Retaliation

Organization prohibits any form of retaliatory or discriminatory behaviors against the complainant or the witnesses.

If the IC notices that any person indulges in retaliation or discrimination against the complainant or the witness, it will recommend the employer to take strict action against the guilty. Any individual who experiences retaliation or discrimination for reporting or testifying a sexual harassment complaint should bring it to the notice of the IC.

7 Appeal Procedure

Any person aggrieved with the findings and/or recommendations of the IC as mentioned above, and/or the non-implementation of such recommendations, may prefer an Appeal to the Court or Tribunal in accordance with the applicable provisions of the POSH Act within a period of 90 days from the date of receipt of the IC's recommendations.

8 Miscellaneous

8.1 Criminal Proceedings

The Employer shall initiate an appropriate action, under the Indian Penal Code or any other law, against such conducts of sexual harassment, by making a complaint with the appropriate authority, if the same is available, so as to ensure that the victims or witnesses are not victimized or discriminated, while dealing with complaints of sexual harassment. The victims of sexual harassment should have the option to seek transfer of the perpetrator or their own transfer, in such cases.

8.2 POSH Complaints Involving Exited Complainants

Exit of the complainant from the organisation shall not, by itself, invalidate a POSH complaint. The Internal Committee (IC) shall retain jurisdiction over complaints concerning incidents arising during the complainant's association with the organisation.

Where a complainant exits during the pendency of a complaint or inquiry, the IC shall make reasonable and documented efforts (ordinarily up to three attempts) to contact the complainant and seek participation.

In the event of continued non-responsiveness, the IC may:

- proceed with the inquiry based on available records and evidence; or
- close the complaint through a reasoned order, recording the efforts made and reasons for infeasibility of continuation.

Such closure shall be procedural in nature and shall not be construed as a finding on the merits of the complaint.

8.3 Annual reports

The IC Committee must make an Annual Report to the Audit Committee of the Company on the complaints received and actions taken for them.

8.4 Awareness

Awareness initiatives should be undertaken to inform employees about their rights, when faced with sexual harassment. In particular, they should be prominently notified of the policy / guidelines, in a suitable manner.

8.5 Record Retention

All records (complaints, evidence, inquiry proceedings, reports, actions taken) shall be securely retained by the IC/HR for a period of at least three (3) years or longer if required by law/policy, with strict confidentiality. (Internal)

9 Glossary

9.1 Sexual Harassment

As per Section 2(n) and Section 3(2) of the POSH Act, sexual harassment includes any one or more of the following unwelcome acts or behavior (whether directly or indirectly):

- Physical contact and advances
- A demand or request for sexual favors
- Making sexually coloured remarks
- Showing pornography
- Any other unwelcome physical, verbal or non-verbal conduct of sexual nature, including via electronic means (email, chat tools, social media, messages).

Circumstances, among other things, that may amount to sexual harassment include: implied or explicit promise of preferential treatment; threat of detrimental treatment; threat about present or future employment status; interference with work or creating an intimidating/hostile environment; and humiliating treatment likely to affect health or safety.

9.2 Workplace

Workplace includes any place visited by the employee arising out of or during the course of employment including offices, client locations, conferences, trainings, meetings, employer-provided transport, communication media provided by the employer, employer-sponsored events, employer-provided accommodation, remote working locations (including home), and social events involving employees. The list is illustrative and not exhaustive.

9.3 Aggrieved Person

A person of any age, irrespective of the employment status, who alleges to have been subjected to any act of sexual harassment by the Respondent.

9.4 Respondent

A person against whom the aggrieved person has made a complaint of sexual harassment.

9.5 Employee

Any person employed at the workplace, including those on contractual, temporary, ad-hoc, daily-wage basis, trainees and apprentices.

9.6 Employer

Employer refers to any person responsible for the management, supervision, and control of the workplace. At IIFL HFL, this primarily means the MD & CEO, and in cases where the allegation involves the MD & CEO, the term shall include the Board of Directors.

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