

AU SMALL FINANCE BANK LIMITED

PREVENTION AND REDRESSAL AGAINST SEXUAL HARASSMENT

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PREVENTION AND REDRESSAL AGAINST SEXUAL HARASSEMENT



PREAMBLE

AU Small Finance Bank Limited is committed to creating a safe and healthy work environment that enables its employees to work without fear of prejudice, gender bias and sexual harassment.

The company also believes that all its employees have the human right to be treated with dignity. Sexual Harassment at the workplace or in the course of official duties, if involving employees of the Bank, shall be considered a grave offence, and is therefore punishable under the applicable laws.

On April 23, 2013, the Government of India has made effective a law called 'The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act 2013' on prevention of sexual harassment against female employees at the workplace.

Any person making unwelcome physical contact and explicit sexual overtures, demanding or requesting sexual favors, making sexually colored remarks or showing pornography against the will of a woman shall be guilty of the offence of Sexual Harassment and Section 354A of the Indian Penal Code 1860 prescribes punishment for this offence to imprisonment.



POLICY OWNER

HR Department and Internal Complaint Committee



APPLICABILITY

This Policy applies to all employees of AU Small Finance Bank (here on referred to as AU or Bank), including permanent management and workmen, temporary trainees, and employees on contract at their workplace or at client sites.



PURPOSE

AU is committed to providing an environment free from sexual harassment. Treating one another with respect and dignity is a core responsibility and helps maintain an inclusive workplace in which all colleagues have the opportunity to demonstrate their full potential. At AU, we do not tolerate harassment of any kind, including sexual harassment. Colleagues are expected to protect and enhance a culture of mutual appreciation and respect and to always speak and treat others in a civil, professional manner.

The objective of this policy is to eliminate sexual harassment in the workplace:

- To provide a working environment that is free from harassment of any kind and in particular, a work environment that does not tolerate 'sexual harassment'.
- To provide appropriate mechanism to deal with the problem and prevent occurrence of sexual harassment where all people respect one another's dignity, privacy and right to equality in the workplace.
- To ensure that sexual harassment is addressed in a sensitive, efficient, effective, and confidential manner.
- To ensure that victims of sexual harassment are afforded alternative remedies when they feel unable to confront the perpetrators or turn to colleagues for support.



DETAILS

- A. 'Sexual Harassment', includes but is not be limited to any one or more of the following unwelcome acts or behavior (whether directly or by implication):
 - i. Physical contact and advances;
 - ii. Demand or request for sexual favors;
 - iii. Making sexually colored remarks;
 - iv. Showing pornography;
 - v. Any other unwelcome physical, verbal, or non-verbal conduct of sexual nature;

vi. Making overt or implied promises of preferential treatment or threats of detrimental treatment, or implied or explicit threats about the colleague's present or future employment status or interference with the colleague's work or creating an intimidating/hostile/offensive work environment or humiliating treatment likely to affect the colleague's mental, physical and emotional health or safety, to compel the colleague to tolerate any one or more of the unwelcome acts or behavior specified under (i) to (v), or requiring submission to such conduct as the basis for employment decisions.

GUIDELINES

The term 'Workplace' shall include but not be limited to Bank Branch/ Bank Offices/ Bank transport, Bank-sponsored/organized off-site, training programs/ trips/ tours/ events/ seminars/ meetings/ conferences, including but not limited to overseas programs and trainings, and to any place visited by the colleague as an employee of the Bank during his/her tenure with the Bank.

Colleagues should ensure that their comments and conduct are, at all times, professionally acceptable, appropriate and, if of a personal nature, welcome. In case of uncertainty, feedback should be sought from the other colleague as to whether what they are saying or doing is welcome or from HR as to whether what they are saying or doing might be perceived as unwelcome.

Colleagues are expected to attend and complete in a timely manner, all Anti-Sexual Harassment awareness sessions and trainings provided by the Bank.

All complaints from colleagues of sexual harassment should be submitted to the Bank's Internal Complaint Committee existing at all its office and branch locations.

Any incident of sexual harassment must be reported to below region-specific email addresses with complete requisite case details as explained below.

1. Northeast: vishakha.ne@aubank.in
2. Southwest: vishakha.sw@aubank.in
3. Central: vishakha.central@aubank.in

Each internal committee has been set up with their area of jurisdiction defined to avoid any confusion on attending the complaints marked on above mail ids. Kindly refer the policy annexure for complete understanding on area of jurisdiction.

Each written complaint must be supported with below information while raising the complaints on above email addresses:

- a) The background of complainer;
- b) The nature/ type of the harassment;
- c) The relevant dates, if possible;
- d) The names of individuals against whom the allegations of sexual harassment are being made through the complaint;
- e) Evidence of sexual harassment, if any.

INTERNAL COMPLAINT COMMITTEE

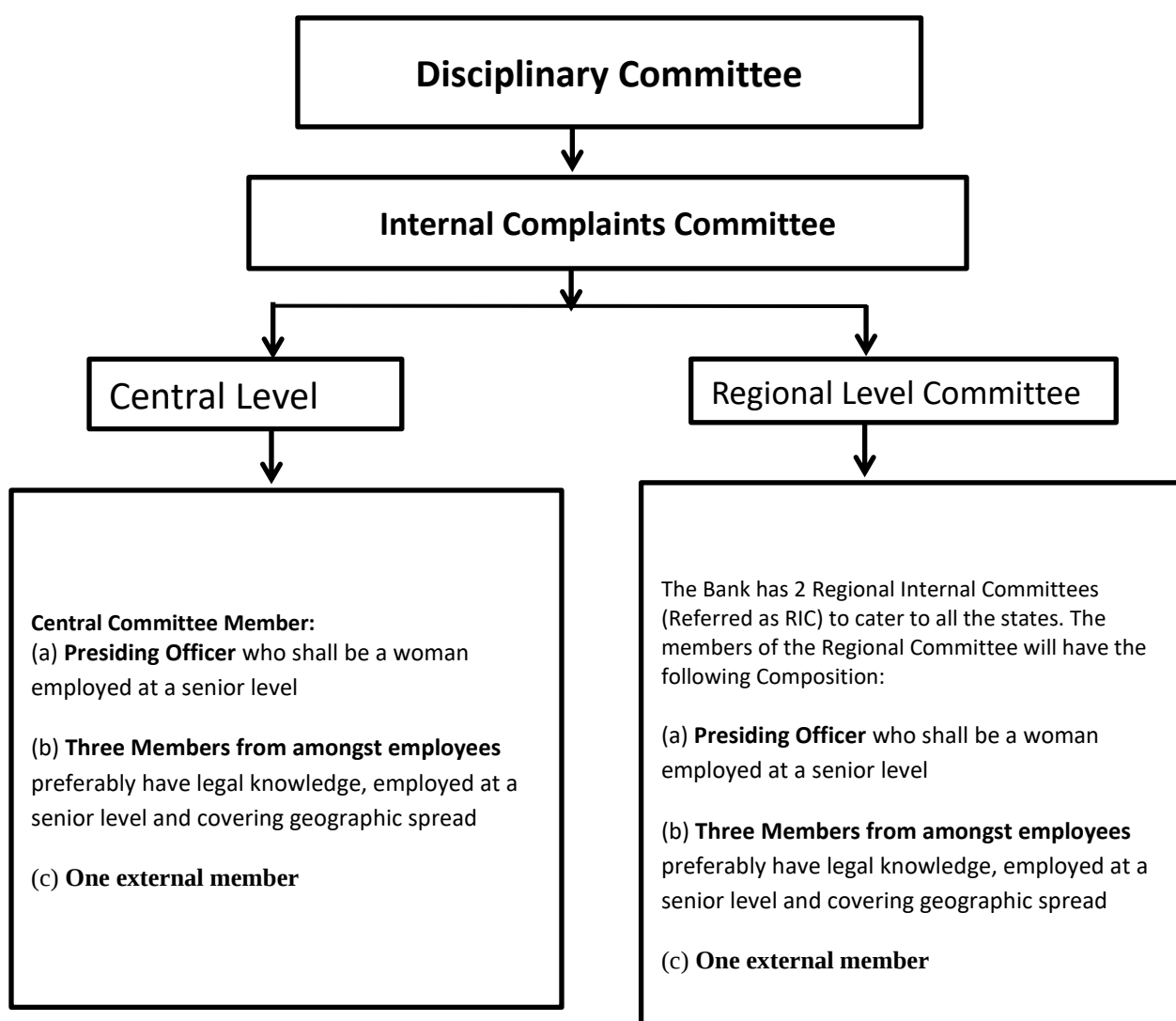
1. The Bank, in compliance with the Act, shall constitute an internal complaints committee by the name of 'INTERNAL COMPLAINT COMMITTEE AGAINST SEXUAL HARASSMENT' (the "Committee") for redressal of complaints of sexual harassment and for ensuring time bound treatment of such complaints.
2. The Committee as required by section 4 of the Act is being constituted at each administrative unit/officer situated in the main branch in every state where the Bank is carrying out its operations.
3. The Committee shall comprise of the following members (at least two members must be women):
 - a) Presiding Officer who shall be a woman employed at senior level with the Bank at the corporate office (In case a senior level woman employee is not available at a particular office, the Presiding Officer shall be nominated from other offices of the Bank).
 - b) One member from non-governmental organizations or associations committed to the cause of women or a person familiar with the issues relating to sexual harassment.
 - c) Two or more employees nominated by the Bank as members preferably committed to the cause of women or who have had experience in social work or have legal knowledge.
 - d) Any other Sr. Staff member nominated by the Bank having experience in banking industry, issues around working of women at workplace.
4. The Committee is responsible for:
 - a) Investigating every formal complaint of sexual harassment;
 - b) Taking appropriate remedial measures to respond to any substantiated allegations of sexual harassment ;
 - c) Discouraging and preventing employment-related sexual harassment;
 - d) Holding a formal meeting with the complainant to discuss the allegation of sexual harassment;
 - e) Arranging individual interviews with the relevant witnesses (if any);
 - f) Ensuring that the right of the Complainant and the witness to be accompanied by a work colleague at any meeting is duly exercised;
 - g) Establishing the facts of the complaint, obtaining statements of the parties and the witnesses and collecting documentary evidence;
 - h) Maintaining detailed records of the investigation process;
 - i) Initiating new investigation, if necessary;
 - j) Ensuring a fair investigation is being carried out
 - k) Monitoring the investigation process to ensure confidentiality as per the terms of this Policy
 - l) Passing a fair decision upon completion of the investigation.
5. The complaint should be made to the Committee, in the manner provided in the Act and the Rules made there under, within three months of incidence of sexual harassment and in case of a series of incidence of sexual harassment within three months from the date of last incidence.

6. Reporting Mechanism: This committee shall send its report to disciplinary committee of the Bank and disciplinary committee shall in turn submit its report to the Board and this shall annually be disclosed in Directors'/annual report of the Bank.

REDRESSAL PROCESS

- Colleagues who believe they have been victims of sexual harassment should report the incident(s), in writing, immediately to any member of the Committee, but not later than three months from the date of incident and in case of series of incident, within three months from the date of last incident date. (Delay in reporting makes it more difficult to establish the facts of a case and may contribute to the repetition of offensive behaviour). Email can also be sent at vishaka@aubank.in
- An initial discussion between the complainant and the complaint-receiving official is desirable and shall be encouraged and will be kept confidential to the extent allowed by law. The Committee shall maintain strict confidentiality while proceeding with the matter, in the interest of the aggrieved.
- A meeting between the Committee members shall be held appropriately and as soon as possible, wherein the complaint shall be heard and investigated by the members.
- The complainant can also submit any corroborative material with a documentary proof, if any, to substantiate his/her complaint.
- In the event, the complaint does not fall under the purview of 'sexual harassment' the committee shall drop the case under this head and may take up the issue as per the guidelines of Bank's Code of Conduct.
- The committee shall maintain the documentation and endorse the complaint received.
- The committee may before initiating an inquiry take steps to settle the matter through conciliation. Once the settlement is arrived, no further inquiry shall be conducted by the Internal Committee.
- The committee may conduct the inquiry in the manner as prescribed under the law.
- The committee shall give recommendation towards appropriate action within 90 days of Complaint received, unless there are exceptional circumstances.
- The complainant /and also the person against whom the complaint has been made shall be called separately for an inquiry and he or she would be given an opportunity to present his or her case before the committee members.
- In case the person, against whom allegations have been made is held guilty, suitable disciplinary action would be taken. However, if the complainant is found to have made false allegations, the concerned is liable for equally suitable disciplinary action.
- The bank shall seek legal course of action if any incident constitutes a criminal offence. In case any employee chooses to proceed with legal action against the offending employee either civil or criminal on his or her own, then the committee shall be entitled to start its internal inquiry/investigation suo-moto and recommend appropriate action.

- The Bank shall ensure that the career interests of the complainant are not adversely affected by virtue of the individual having drawn attention to such an offence.
- In case the Function Head/ Department Head/ Branch Head or any other employee is aware of incidents of 'sexual harassment', then they can put up the complaint before the committee and action can be precipitated accordingly by the committee
- The committee would communicate recommendations to the Management within 10 days of completion of inquiry. Management may act upon the recommendations within 30 days of its receipt.



Note: Ms. Aanchal Kapoor being external member shall be members at all levels. These committees are formed to facilitate the investigation at the regional level:

1. The Delhi based committee will look into all cases from North and East.

2. The Mumbai based committee will look into all cases from South and West.

Each of the above committees will have adequate representation from the respective geographies.

All the new appointments/ change in appointments in the regional level committee (Except the external member) will be done by Chief of Human Resources

The Regional Committee will work under the guidance of the Central level committee. In case of any disputes at regional level, the Central committee's decision shall be final.

Any aggrieved employee can write directly at vishaka@aubank.in if there is inordinate delay in inquiry or the employees is not satisfied with the outcome of proceedings.

DISCIPLINARY ACTION:

- Sexual harassment will not be tolerated at AU. If the outcome of the investigation by the committee, upon any allegation of 'sexual harassment' shows that harassing behaviour has taken place, the harasser will be subject to disciplinary action up to and including termination of employment besides other actions as may be provided under the relevant laws.
- In case any such conduct amounts to a specific offence under the Indian Penal Code or under any other law, the bank may initiate appropriate action in accordance with law by making complaint to the appropriate authority.

APPEAL:

A staff who is not satisfied with the decision of the ICC may raise an appeal with the Appellate Authority, by writing an email to MD & CEO of the Bank.

CONFIDENTIALITY:

The contents of the complaint, the identity and addresses of the aggrieved employee, respondent and witnesses, any information relating to conciliation and inquiry proceedings, recommendations of the committee and the action taken by AU shall not be published, communicated, or made known to the public, press and media in any manner. All complaints / grievances of sexual harassment will be taken seriously, will be held in strict confidence, and will be investigated promptly in an impartial manner. For the purpose of completing the investigation, key witnesses or other stakeholders may be required to be taken into confidence at the strict discretion of the committee.

DISCLAIMER

While this policy has been made as informative as possible and structured to ensure quick and easy interpretation by all employees, you are encouraged to reach out to your concerned HR Business Partner if you must seek clarity on any aspect related to this policy. As and when there's an amendment to this policy, the updated policy document will be shared by the HR department through the appropriate channel of communication.

In case of any ambiguity related to understanding of this policy, the final interpretation by the management and the HR Head will be considered as applicable.

Annexures

Jurisdiction of Internal Committee (IC) & Regional Level Committee (RLC) for Prevention and Redressal of Sexual Harassment at Workplace

States	Jurisdiction
Rajasthan	Central
Gujarat	Central
Madhya Pradesh	Central
Chhattisgarh	Central
Total	

States	Jurisdiction
Maharashtra	South & West
Karnataka	South & West
Telangana	South & West
Tamil Nadu	South & West
Goa	South & West
Andhra Pradesh	South & West
Kerala	South & West
Total	
Grand Total	

States	Jurisdiction
Haryana	North & East
Punjab	North & East
Delhi	North & East
Uttar Pradesh	North & East
Himachal Pradesh	North & East
West Bengal	North & East
Chandigarh	North & East
Jammu & Kashmir	North & East
Assam	North & East
Bihar	North & East
Jharkhand	North & East
Odisha	North & East
Uttarakhand	North & East
Total	