

POLICY ON

PREVENTION

OF

SEXUAL HARASSMENT

Effective from: 1st June 2014

1. **INTRODUCTION**

WSFx Global Pay Limited (Formerly known as Wall Street Finance Limited) (Hereinafter referred as “WSFx”) promotes a diverse workplace where each employee receives equal opportunities for success based on merit. Employment decisions are not based on race, color, religion, national origin, ancestry, sexual orientation, gender, marital status, age, disability, veteran status or any other factor protected by law. WSFx does not tolerate any form of harassment, or behavior that has the purpose or effect of creating an intimidating, hostile or offensive work environment for another person.

The company already has a Sexual Harassment Policy in existence. The Board approved and implemented the revised policy on Prevention of Sexual Harassment which is made in accordance with “The Sexual Harassment of women at Workplace (Prevention, Prohibition and Redressal) Act, 2013” (hereinafter referred as “Act”) read with The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Rules, 2013. This policy is meant to educate the employees about what conduct constitutes Sexual Harassment and the policy which WSFx is adopting to prevent occurrence of any such event, and in the unlikely chance of such an occurrence, to enable a fair mechanism for dealing with such conduct.

2. **APPLICABILITY**

This policy is applicable on all Employees of WSFx including permanent, temporary, contract worker, probationer, trainee, apprentice and is deemed to be incorporated in the service conditions of all Employees.

“Employee” means “Employee” as defined under Section 2 (f) the Act, as reproduced hereunder:

Employee means 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.

EFFECTIVE DATE

This policy is effective from 1st June 2014 and updated latest on 24th December, 2025.

3. **WORKPLACE**

The Workplace includes:

- (i) All offices or other premises where the WSFx’s business or services supporting to the business are conducted; or.
- (ii) All WSFx related activities performed at any other site away from the WSFx’s premises; or.

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- (iii) Any place visited by the employee arising out of or during the course of employment including transportation provided by the employer for undertaking such journey.

4. **DEFINITION OF SEXUAL HARASSMENT**

Sexual Harassment would mean and include any of the following:

“Sexual Harassment” includes any one or more of the following unwelcome acts or behavior (whether directly or by implication) namely:

- physical contact and advances; or
- a demand or request for sexual favors; or
- making sexually colored remarks; or
- showing pornography; or
- 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:

- Implied or explicit promise of preferential treatment in employment; or
- Implied or explicit threat of detrimental treatment in employment; or
- Implied or explicit threat about present or future employment status; or
- Interference with work or creating an intimidating or offensive or hostile work environment; or
- Humiliating treatment likely to affect health or safety.

The following are some basic definitions for reference:

Aggrieved Woman/Employee:

- (a) 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;
- (b) in relation to dwelling place or house, a woman of any age who is employed in such a dwelling place or house;

Respondent: Means a person against whom the Complainant has made a complaint of Sexual Harassment.

Complaint: Means a voiced objection or the allegation by the Aggrieved woman or any other person (whether in writing or oral) of Sexual Harassment by the Respondent that forms the basis of an investigation under this policy.

Complainant: Means an Aggrieved woman or any other person as referred under clause no. 6.5 to 6.8

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District Officer: Means a District Magistrate or Additional District Magistrate or the Collector or Deputy Collector as may be notified by the State Government as a District Officer for every district to exercise power or discharge functions under the Act.

Employer means: The head of the organization or any person who is responsible for the management, supervision and control of the work place.

5. **INTERNAL COMPLAINTS COMMITTEE**

An Internal Complaints Committee (hereinafter called as “Committee”) has been constituted by WSFx to consider and redress Complaints of Sexual Harassment. Details of the Committee members are attached below.

Constitution of Committee

A. **Members of the Committee**

The Members of the Committee shall consist at least 4 members,

- A Presiding Officer who shall be a woman employed at a senior level at workplace from amongst the employees,
- Two members preferably committed to the cause of women or who have had experience in social work or have legal knowledge; and
- One member from amongst non-governmental organisations or associations committed to the cause of women or a person familiar with the issues relating to sexual harassment.
- At least half of the total members should be women.

Provided that, in case, any of the members of the Committee is the victim/respondent of an act of Sexual Harassment, then in such a case, the concerned member shall not participate as a member in the Committee Meetings and if required, the Committee shall be reconstituted.

B. **Tenure and Fees to the Members**

The Presiding Officer and every Member of the Committee shall hold office for such period, not exceeding three years, from the date of their nomination as may be specified by the employer. The Member appointed from amongst the non-governmental organizations or associations shall be paid such fees or allowances for holding the proceedings of the Internal Committee, by the employer, as may be prescribed.

6. **COMPLAINT FILING PROCESS**

- 6.1. Any Complainant may make Complaint of Sexual Harassment at Workplace to Committee within period of 3 months from date of incident and in case of series of incidents within a period of 3 months from date of last incident.
- 6.2. The Complainant may send the Complaint by writing a letter or email to the Committee. Provided that where such Complaint cannot be made in writing,

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the Presiding Officer or any member of the Committee shall render all reasonable assistance to the Complainant for making the Complaint in writing.

- 6.3. The Aggrieved woman may also contact her Reporting Manager and/or HR Manager for any support that may be required for filing the Complaint.
- 6.4. The time limit of 3 months can be extended by committee if it is satisfied that the circumstances were such which prevented the Complainant from filing of Complaint within the said period of 3 months.
- 6.5. Where an Aggrieved woman is unable to file Complaint on account of her physical incapacity a Complaint may be filed by:
 - a. Relative or friend; or
 - b. Co-worker; or
 - c. An officer of National commission for women or state women commission; or
 - d. Any person who has knowledge of the incident, with the written consent of the Aggrieved Employee; or
- 6.6. Where an Aggrieved Woman is unable to file Complaint on account of her mental incapacity a Complaint may be filed by:
 - a. Relative or friend; or
 - b. A special educator; or
 - c. A qualified psychiatrist or psychologist
 - d. The guardian or authority under whose care she is receiving treatment or care; or
 - e. Any person who has knowledge of the incident jointly with her relative or friend or a special educator or psychologist or authority under whose care she is receiving treatment or care; or
- 6.7. Where the Aggrieved Woman, for any other reason, is unable to make Complaint, any other person who has knowledge of the incident, with the written consent of the Aggrieved Employee can make Complaint on her behalf.
- 6.8. Where the Aggrieved Woman is dead, a Complaint may be filed by the legal heir or any person who has knowledge of incident with the written consent of her legal heir.

7. CONCILIATION

A person who experiences Sexual Harassment may prefer to resolve the issue through Conciliation. However, this is not a pre-condition and completely the prerogative of the aggrieved woman. The option of going to the Committee at any point is always available and in some cases highly desirable as the Committee is the only competent authority within the Company to formally investigate and

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recommend action on such issues. However, if settlement is arrived at through conciliation, no further inquiry shall be conducted by the Committee.

- 7.1. The committee may at the request of the Aggrieved Woman take steps to settle the matter between Aggrieved Woman and the Respondent through conciliation. However, no monetary settlement shall be made as basis of conciliation.
- 7.2. In case of settlement through conciliation, the committee shall record the settlement and forward the same to the HR Department of the Company to take necessary action as per the settlement. Copies of the settlement shall also be provided to Aggrieved Woman and Respondent.
- 7.3. In the event, Aggrieved Woman reports to the Committee that any terms and conditions of settlement arrived has not been complied by the Respondent, the Committee shall proceed to make inquiry as per the procedure prescribed in this policy or forward the Complaint to local police.

8. INQUIRY INTO COMPLAINT

- 8.1. Where a Complaint has been made by Complainant, the Committee shall immediately proceed with the inquiry and communicate the same to the Complainant. The Complainant and the Respondent shall be explained guidelines, adopted by the Company, for better understanding of their rights and the procedure.
- 8.2. The Complainant shall submit written complaint alongwith supporting documents including the details of the incident, name/s of the Respondent and witnesses. The Complaint should include the details of the Aggrieved Woman such as name, address, contact number, department etc.
- 8.3. The Committee shall forward a copy of Complaint received to the Respondent, within 7 working days of receipt of the same.
- 8.4. The Respondent shall file his reply to the Complaint along with his list of documents, names and addresses of witnesses, within period of 10 working days from date of receipt of the Complaint from the Committee.
- 8.5. The Committee shall make inquiry as per principle of Natural Justice.
- 8.6. For the purpose of making an inquiry, the Committee shall have the same powers as are vested in a civil court under the Code of Civil Procedure, 1908, when trying a suit in respect of the following:
 - a. summoning and enforcing the attendance of any person and examining him on oath;
 - b. requiring the discovery and production of documents.

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9. INTERIM RELIEF

During pendency of an inquiry, on a written request made by Aggrieved Woman, the Committee may recommend to the HR Department to:

- 9.1. Transfer the Aggrieved Woman or the Respondent to any other Workplace; or
- 9.2. Grant leave to the Aggrieved Woman upto period of 3 months (The leave granted shall be in addition to leave, the Aggrieved Woman is otherwise entitled to); or
- 9.3. Restrain the Respondent from reporting on the work performance of the Aggrieved Woman or writing his/her confidential report and assign the same to another reporting manager;
- 9.4. Grant such other relief to the Aggrieved Woman as may be appropriate.
- 9.5. The HR Department shall implement the recommendation(s) and send the report of implementation to the Committee.

10. REPORTING OF FINDINGS

- 10.1. On completion of inquiry, the Committee shall provide report of its findings to the HR Department of the employer within 10 days of completion of inquiry and such report shall also be made available to Complainant and Respondent.
- 10.2. Where Committee arrives at a conclusion that allegation against Respondent has not been proved, it shall recommend that no action is required to be taken in the matter.
- 10.3. Where Committee arrives at a conclusion that allegation against Respondent has been proved, it shall recommend to the HR Department of the employer:
 - a. to take action for Sexual Harassment as a misconduct in accordance with Company policies. A list of possible disciplinary actions that can arise out of the recommendations of the committee are attached as **Annexure – A**;
 - b. deduction of such sums from salary of the Respondent as it may consider appropriate to be paid to Aggrieved Woman or her legal heirs. The Committee can also direct Respondent to pay such sum where it is not possible to make deductions from salary of Respondent due to his being absent from duty or cessation of employment.
 - c. in case the Respondent fails to pay the sum referred to in clause (b) above, the Committee may forward the order for recovery of the sum as an arrear of land revenue to the concerned District Officer.
- 10.4. The Committee shall complete the “Inquiry” within reasonable period but not beyond ninety days from date of reporting of incident.

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- 10.5. The HR Department of the employer will direct and implement appropriate action in accordance with the recommendation proposed by the Committee within 60 days from date of its receipt.
- 10.6. The Committee shall in each calendar year prepare an annual report providing the following details:
- a. number of Complaints of Sexual Harassment received in the year;
 - b. number of complaints disposed off during the year;
 - c. number of cases pending for more than 90 days;
 - d. number of workshops or awareness programme against Sexual Harassment carried out;
 - e. nature of action taken by WSFX.

The Committee shall submit the annual report to the Board of Directors and the District Officer.

11. PROTECTION AGAINST RETALIATION

Employees are encouraged to express freely, responsibly and in an orderly way opinions and feelings about any problem or Complaint of Sexual Harassment. Retaliation against persons who report or provide information about Sexual Harassment or behavior that might constitute Sexual Harassment is strictly prohibited. Any violation of this provision shall result in appropriate disciplinary action.

12. APPEAL

Any person aggrieved from recommendations made by the Committee or non implementation of recommendations can prefer an appeal within a period of 90 days from the recommendations to appellate authority in accordance with the act.

13. CONFIDENTIALITY

The Company understands that it is difficult for the victim to come forward with a Complaint of Sexual Harassment and recognizes the victim's interest in keeping the matter confidential.

All information received shall be kept strictly confidential. The contents of the Complaint, the identity and address of the Complainant/Victim, Respondent and witness, any information relating to conciliation and inquiry proceedings, recommendation of committee and the action taken by management under this policy shall be kept strictly confidential and shall not be published communicated or made known to the public, press and media in any manner. However, information regarding the justice secured to any victim of Sexual Harassment under the Act without disclosing the identity can be disseminated, where required by any law.

Any person (including witnesses) who breaches confidentiality shall be subject to possible disciplinary action as provided under Annexure-A as determined by the Committee.

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14. ACCESS TO REPORTS AND DOCUMENTS

The Committee shall keep complete and accurate documentation of the Complaint, its investigation and the resolution thereof. The incident would be documented in both the Aggrieved Woman and the Respondent files with the full report of the committee. All records of Complaints, including contents of meetings, results of investigations and other relevant material will be kept confidential by the Company except where disclosure is required under disciplinary or other remedial processes.

15. PUNISHMENT FOR FALSE OR MALICIOUS COMPLAINT AND FALSE EVIDENCE

This policy has been evolved as a tool to ensure that in the interest of justice and fair play and for providing a forum to approach in the event of instances of Sexual Harassment. However, if on investigation it is revealed that the Complaint was made with a malicious intent or Complainant or the person making the Complaint has made the Complaint knowing it to be false or has produced any forged or misleading documents or with motive of maligning the concerned individual / tarnishing his/her image in the company or to settle personal/professional scores, possible disciplinary action will be taken against the Complainant as provided under Annexure-A as determined by the Committee.

However, a mere inability to substantiate a Complaint or provide adequate proof need not attract action against the Complainant.

16. DISSEMINATION OF THE POLICY

A copy of this Policy shall be given to all Employees and to all new recruits and they shall sign a statement acknowledging that they have received, read, understood and will abide by the Policy.

WSFX shall display at all times at any conspicuous place in the work place the penal consequence of Sexual Harassment and the order constituting the Committee and organize workshops and awareness programs at regular intervals for sensitizing the employees with the provisions of the Act and orientation programmes for the members of the Committee.

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ANNEXURE – A

POSSIBLE DISCIPLINARY ACTIONS ARISING OUT OF THE RECOMMENDATIONS OF THE COMMITTEE

- (1) A letter of warning that will be placed in the personal file of the harasser;
- (2) Immediate transfer or suspension without pay or both;
- (3) Fine equivalent to 2-4 months' salary that can be credited to a fund created to be utilized for the welfare of the Employees;
- (4) Withholding of increment with or without cumulative effect;
- (5) Reduction in rank/ Withholding of Promotion;
- (6) Termination/dismissal from the services of the Company;
- (7) Written Apology;
- (8) Undergoing a Counseling session or carrying out community service;
- (9) Filing a Complaint before the relevant police station/Court; &
- (10) Any other action that the Disciplinary Authority may deem fit.

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CURRENT INTERNAL COMPLIANT COMMITTEE (ICC)

Name	Designation	Committee Role	Contact Details
Ms. Pooja Mishra	Chief Financial Officer	Presiding officer	pooja.mishra@wsfxglobalpay.com
Ms. Vani Visrodia	Business Head Corporate Sales	Member	vani@wsfxglobalpay.com
Mr. Praveen Koppikar	Principal Officer	Member	praveen.koppikar@wsfxglobalpay.com
Mr. Nakul Grover	Legal Consultant	External Member	nakulgrv@gmail.com

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