

ALGOQUANT FINTECH LIMITED

**POLICY ON PREVENTION, PROHIBITION AND REDRESSAL OF
SEXUAL HARASSMENT AT WORKPLACE**

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INTRODUCTION

Algoquant Fintech Limited (herein after referred to as ‘Company’) is committed to provide a work environment that ensures every woman employee is treated with dignity and respect.

The Company is, also, committed to promote a work environment that is conducive to the professional growth of its women employees and encourages equal opportunity.

The Company will not tolerate any form of sexual harassment and is committed to take all necessary steps to ensure that its women employees are not subjected to any form of harassment.

2) SCOPE

The policy applies to all categories of employees of Algoquant Fintech Limited and Group Companies. This includes all the permanent employees (management cadre and workmen), temporary employees, trainees, employees on contract or working in part time and employees working as consultants.

The Company will not tolerate sexual harassment, if engaged in by clients or by suppliers or any other business associates. This policy comes into effect immediately.

Workplace includes:

All the Company offices or any other premises where the office work of the Company is carried out; and

Any social gathering related to office work, business or other functions where the conduct or comments may have an adverse affect on the employees working.

3) DEFINITION OF SEXUAL HARASSMENT

Sexual harassment may be one or a series of incidents involving unsolicited and unwelcome sexual advances, request for sexual favors, or any other verbal or physical conduct of sexual nature. Sexual Harassment at the workplace includes:

1. Unwelcome sexual advances (verbal, written or physical);
2. Demand or request for sexual favors;
3. Any other type of sexual-oriented conduct;
4. Verbal abuse or joking that is sex-oriented;
5. Showing pornography; and
6. Any other unwelcome physical, verbal or non-verbal conduct of sexual nature.

4) RESPONSIBILITIES REGARDING SEXUAL HARASSMENT

All the employees of the Company have a personal responsibility to ensure that their behavior is not contrary to this Policy. All the employees are hereby encouraged to maintain a work environment which is free from sexual harassment.

5) INTERNAL COMPLAINT MECHANISM

As per the - “The Sexual, Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 the Company has created “Internal Complaint Committee”. This committee has been created for time bound redressal of complaints made by the victims.

6) INTERNAL COMPLAINTS COMMITTEE

The Company has instituted a Complaints Committee for redressal of sexual harassment complaints (made by the victims) and for ensuring time bound treatment of such complaints.

Initially, and till further notice, the Complaints Committee will comprise of the following four members out of which at least two members will be women:

- (i) Presiding Officer - Women employed at senior level;
- (ii) Members - Two members from amongst the employees preferably committed to the cause of women or who have experience in social work or have legal knowledge; and
- (iii) One member from amongst non-governmental organizations (NGO) or associations committed to the cause of women.

The Complaints Committee is responsible for:

- Investigating every formal written complaint of sexual harassment;
- Taking appropriate remedial measures to respond to any substantiated allegations of sexual harassment;
- Discouraging and preventing employment-related sexual harassment;

7) REDRESSAL AND ENQUIRY PROCESS

(i) Any employee who feels to be sexually harassed directly or indirectly may make a formal complaint to the Presiding Officer of the Internal Complaints Committee constituted by the Management. The complaint shall have to be in writing and can be in form of a letter, preferably within 15 days from the date of occurrence of the alleged incident, and should be sent in a sealed envelope. Alternately, the employee can send complaint through an email. The employee is required to disclose her name, department, division and location she is working in, to enable the Presiding Officer to contact her and take the matter forward;

(ii) The Presiding Officer of the Internal Complaints Committee will proceed to determine whether the allegations (assuming them to be true only for the purpose of this determination) made in the complaint fall under the purview of Sexual Harassment, preferably within 30 days from the receipt of the complaint. In the event, the allegation does not fall under the purview of Sexual Harassment; s/he will record this finding with reasons and communicate the same to the complainant;

(iii) In the event the Presiding Officer of the Internal Complaints Committee determines that the allegations constitute an act of sexual harassment, s/he will proceed to investigate the allegation with the assistance of the Internal Complaints Committee;

(iv) If such a conduct on the part of the accused amounts to a specific offence under the law, the Company shall initiate appropriate action in accordance with law by making a complaint with the appropriate authority;

(v) The Internal Complaints Committee shall conduct such investigations in timely manner and shall submit a written report containing the findings and recommendations to the Director Corporate HRD. This should be done as soon as practically possible and, in any case, not later than 90 days from the date of receipt of the complaint. The Director - Corporate HRD, will ensure corrective action (Formal apology, Counselling, Warning Letter, Transfer, Suspension, Termination, etc.) on the recommendations of the Internal Complaints Committee and keep the complainant informed of the same; and

(vi) After the enquiry the complaint is found to be false, the Complainant shall, if deemed fit, be liable for appropriate disciplinary action by the Management.

8) CONFIDENTIALITY

To protect the interests of the victim, the accused person/s and others who may report the incident of the sexual harassment, confidentiality will be maintained throughout the investigation process and thereafter.

9) ACCESS TO THE REPORTS AND DOCUMENTS

All the records of complaints, including the minutes of the meetings, results of investigations and other relevant material will be kept confidential by the Company except wherein disclosure is required under disciplinary or other remedial processes.

10) PROTECTION TO COMPLAINANT/VICTIM

The Company is committed to ensuring that no employee who brings forward a harassment concern is subject to any form of reprisal. Any reprisal is subject to disciplinary action.

The Company will ensure that the victim or witnesses are not victimized or discriminated against while dealing with complaints of sexual harassment.

However, anyone who abuses the procedures will be subject to disciplinary action.

11) CONCLUSION

In conclusion the Company reiterates its commitment to providing its women employees a workplace free from harassment/discrimination and where every employee is treated with dignity and respect.

AQFINTTECH

CIRCULAR

01st November 2014

This is to inform you all that as per the guidelines issued under “the Sexual Harassment of Women at workplace (Prevention, Prohibition and Redressal) Act, 2013” our Company have defined a **“POLICY ON PREVENTION, PROHIBITION AND REDRESSAL OF SEXUAL HARASSMENT AT WORKPLACE.”**

This Policy is being put on display at all locations for the reference of all employees and would be put on the Company’s website as well. All employees are, hereby, requested to kindly go through the Policy and ensure that it is implemented in letter and spirit.

Along with the implementation of the Policy, an internal Complaints Committee is being constituted and the members of the same are as follows:-

Ms. Ayushi Jain	Executive	Presiding Officer
Ms. Anshika Gupta	Intern	Member
Ms. Pallavi Chauhan	Intern	Member
Mr. Pawan Tanwar	Admin	Member

Would seek your cooperation to implement the Policy and to build a work environment foundation of which is based on equality and dignity for our women colleagues.

Devansh Gupta
Managing Director