

Sexual Harassment & Redressal Policy

Version:	V8
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Reviewed By:	POSH Team
Approved By:	Chief Human Resource Officer
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Version	Issue Month	Revision Description
1.0	Since Inception	First version of the Sexual Harassment & Redressal Policy
2.0	February 2024	Change in the ICC committee members
3.0	August 2024	Change in the ICC committee members
4.0	January 2025	Change in the ICC & LCC committee members
5.0	March 2025	Change in the ICC committee members
6.0	May 2025	Change in the LCC committee members
7.0	Nov 2025	Change in the ICC & LCC committee members
8.0	Feb 2026	SheBox Portal reference outlined in the policy as one of the reporting channels

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1. Introduction:

IIFL Group (which includes its group companies, subsidiaries etc. and hereinafter together referred to as “IIFL”) 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 organization. The employees have the right to work in an environment free from all forms of discrimination and conduct 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 and is committed to provide and ensure a safe, harassment free working environment to all its employees.

2. 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.

Sexual harassment results in violation of the fundamental right of a woman to equality, under Articles 14 and 15 of the Constitution of India; her right to live with dignity, under Article 21 of the Constitution; and her right to practice any profession or to carry on any occupation, trade or business in a safe environment that is free from sexual harassment. Keeping this in mind, the IIFL group of companies (henceforth referred to as ‘IIFL’) has formulated a Policy on the Prevention & Redressal of Sexual Harassment of Women Employees at the Workplace. All employees are required to be aware of this policy and to note the consequence of not complying with it.

3. Applicability:

This policy shall be applicable to all temporary/contractual/permanent employees, including trainees & apprentices, employed with any business of IIFL, at all its offices, at the workplace / at company events / at training programs of the Company.

4. Definition Of Sexual Harassment:

Sexual Harassment is a form of misconduct that undermines the integrity of the employment relationship. A broad definition of Sexual Harassment would include any physical or verbal behavior and any form of communication that has unnecessary, improper or unwelcome sexual connotations. It may consist of, but is not be limited to any of the following:

- Unwanted physical, verbal or visual sexual advances
- Requests or demands for sexual favors

- Innuendos / hints / suggestions of sexual nature
- Actual sexual assault
- Comments with sexual overtones, sex-related jokes, insults and other sexually colored remarks
- Unwelcome graphic comments about a person's body, made in their presence, or directed towards them
- Unwelcome and inappropriate inquiries about a person's sex life
- Unwelcome whistling / gestures, directed at a person or group of persons
- Touching or brushing against any part of the body
- Physical confinement of any part of the body
- Physical confinement, against one's will, and any other act that is likely to violate one's privacy
- Sexually oriented conduct, which is offensive or objectionable to the recipient, including, but not limited to, epithets, derogatory or suggestive comments, slurs and gestures, and offensive posters, cartoons, pictures, drawings, e-mail messages or sms / mms, etc
- Any other unwelcome physical, verbal or non-verbal conduct of sexual nature

Unwelcome sexual advances (either verbal or physical), requests for favors and other verbal or physical conduct of a sexual nature constitute sexual harassment when:

- Submission to such conduct is either an explicit or implicit term or condition of employment (e.g. promotion, training, timekeeping or overtime assignments)
- Submission to or rejection of the conduct is used as a basis for making employment decisions (e.g. hiring, promotion, termination)
- The conduct has the purpose or effect of interfering with an individual's work performance or creating an intimidating, hostile, or offensive work environment
- Sexual favoritism exists where a person who is in a position of authority rewards only those who respond to his / her sexual advances, whilst other deserving employees, who do not submit themselves to any sexual advances, are denied promotions, merit rating or salary increases

5. Sexual Harrassment Redressal System:

While all employee (s) /associate (s) should adhere to decent behaviour 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 Complaints Committee (ICC):

An Internal Complaints Committee (ICC) for IIFL Group was constituted on Feb 21, 2014, pursuant to the provisions of the Sexual Harassment of Women at Workplace (Prevention, Prohibition & Redressal) Act, 2013.

Below are the list of members of ICC as well Local Committee including external members for IIFL Finance only.

Name	Role	Committee	Email ID	Contact No
Kirti Timmanagoudar	Presiding Officer	ICC	kirti1@iifl.com	8879004010
Pushpak Hegde	Member	ICC	pushpak.hegde@iifl.com	8976839681
Akshata Samip Prabhu	Member	ICC	Akshata.prabhu@iifl.com	9967492860
Sourav Mishra	Member	ICC	sourav.mishra@iifl.com	9920285887
Viji Hari	External Member	ICC	-	-
Vasundhara Vedula	External Member	ICC	-	-

This ICC will cater to all IIFL locations.

(II) Local Complaints Committee (LCC):

Name	Role	Zone	Email ID	Contact No
Amlan Jyoti Chatterjee	Member	East	amlan.chatterjee@iifl.com	9831384489
Vishakha Goenka	Member	East	vishakha.goenka@iifl.com	8017634788
Neha Pandey	Member	North 1	neha.pandey3@iifl.com	8887882689
Manish Tiwari	Member	North 2 & west 2	manish.tiwari7@iifl.com	9887430194
Shahid Alam	Member	West 1	shahid.alam@iifl.com	9599181861
Sravanthi Chandamalla	Member	South 1	sravanthi.ch@iifl.com	9321705404
Anil Chowdary	Member	South 1	anil.chowdary@iifl.com	7400264918
Janani	Member	South 2	janani.b@iifl.com	8438173940
William Bhaskar	Member	South 2	william.r@iifl.com	9176632907
Ravi HN	Member	South 3	ravi.hn@iifl.com	9964422686
Priyank Vijayvargiy	Member	Central	priyank.vijayvargiy@iifl.com	9904903437
Anmol Jodha	Member	Central	anmol.jodha@iifl.com	9725264750

(a) E-mail Facility:

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

(b) Tenure of ICC & LCC:

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

(c) Scope of ICC & LCC:

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

While dealing with the complaint, ICC 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

- (i)** Any aggrieved person may make, by drafting an initial e-mail to the dedicated e-mail ID, a complaint of sexual harassment at workplace to the ICC, 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.
- (ii)** In addition to the internal reporting mechanism stated above, an aggrieved person may also register a complaint through the SHe-Box (Sexual Harassment electronic Box) Portal, a Government of India–mandated centralized online platform for reporting complaints of sexual harassment at the workplace.
- (iii)** An “aggrieved person” refers to a person, of any age, at all IIFL locations, whether employed or not, who alleges to have been subjected to any act of sexual harassment by the Respondent.
- (iv)** If the aggrieved person is unable to make a complaint on account of her physical or mental incapacity, death or otherwise, her legal heirs may make a complaint, as per the Sexual Harassment of Women at Workplace (Prevention, Prohibition & Redressal) Act.
- (v)** ICC may, before initiating an inquiry at the request of the aggrieved person, take steps to settle the matter between her and the Respondent. Where a settlement is arrived, no further inquiry shall be conducted by the ICC.
- (vi)** ICC must hold separate meetings with the aggrieved person and the alleged harasser to record and investigate the statements given by them. In addition, ICC can call for any witness / documents / records etc., as are relevant to the case, during the inquiry.
- (vii)** The meetings with the Complainant and the alleged harasser will be held by the ICC or an investigator, as decided by the ICC, at the most convenient IIFL location.
- (viii)** In case the Internal Committee arrives at a conclusion that the allegations against the respondent are true, it shall make recommendations to the employer and, accordingly, necessary action will be taken against the alleged harasser.

- (ix)** If a false complaint has been filed and the investigation has proved that the motivation of the Complainant was purely to defame the alleged harasser, disciplinary action will be taken against the Complainant, similar to the action described in Clause (vii) of this Policy.
- (x)** If the findings of the investigation into the allegation of sexual harassment reveal harassing behavior, the harasser will be subjected to disciplinary action, as per IIFL employee Code of Conduct. This includes:
- Transfer from the present locations / Department / Positions;
 - Demotion;
 - Withholding of salary, incentives, bonus or any other remuneration;
 - Suspension from services;
 - Termination of services;

The Grievance Committee shall recommend action, as suitable to the case, to the Head–Human Resource who will decide on the next course of actions, accordingly.

- (xi)** If in the opinion of the Committee, the complaint is blatantly false or misrepresented, or has been ill-motivated, the Committee would recommend the initiation of a suitable disciplinary action against the Complainant