Policy on Prevention and Redressal of Sexual Harassment at Workplace

1. Introduction

HDFC Life Insurance Company Limited ("HDFC Life") as an employer is committed to creating a healthy and safe work environment that enables employees to work free from unwelcome, offensive and discriminatory behaviour. The company aims to enable employees to deliver their best at work without fear of discrimination, gender bias and sexual harassment. The **Company** recognizes the consequences of sexual harassment and that sexual harassment can subject individuals to fear, stress and anxiety. It acknowledges the strains that such harassment places on the work and family life of an individual.

This Policy extends to all employees of HDFC Life and select subsidiaries, representative office or its branches (elsewhere mentioned)– hereinafter referred to as 'Company' in this Policy

Sexual harassment at the workplace is a form of discrimination. Protection against sexual harassment and right to work with dignity are universally recognized human rights by international conventions and instruments. Therefore, in order to deal with sexual harassment at workplace the **Company** has set out Prevention and Redressal of Sexual Harassment **Policy**. This policy is inclusive and recognises the importance of self respect of every individual working or associated with the company, irrespective of their gender or sexual orientation.

The **Policy** aims to prevent/prohibit and redress any incident of sexual harassment and to enforce strong disciplinary action in face of any such occurrence. It defines sexual harassment and provides a framework to deal with complaints of sexual harassment at the workplace or related to the workplace, even if the employees are working from home and not physically present in the office.

Any form of sexual harassment whether overt or covert is therefore unacceptable and regarded as Serious misconduct as per this **Policy**. It explicitly prohibits sexual harassment at work place or off site, either during or in connection with activities related to work. The **Company** will take action consistent with its disciplinary and grievance procedures against any employee found to have breached this **Policy**. The **Company** will also take steps to comply with any specific domestic laws relating to this issue.

The **Company** is committed to ensure that sexual harassment instances and incidents are reported without fear of reprisal or retaliation. The **Company** will investigate instances / and or complaints of sexual harassment promptly and discreetly. The **Company** will initiate disciplinary action as per the

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stipulations provided in this **Policy**. This policy has been framed in accordance with the provisions of "The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013" and rules framed thereunder (hereinafter "the Act"). Accordingly, while the policy covers all the key aspects of the Act, for any further clarification reference shall always be made to the Act and the provisions of the Act shall prevail. If any aspect relating to sexual harassment not explicitly covered in this policy is provided for by the law, then the law will be applicable. In case of any conflict between the policy and the law, the law will prevail. This policy provides protection against sexual harassment at workplace and the prevention and redressal of complaints of sexual harassment and matters related to it. This policy is in line with the Sexual Harassment of Women at Workplace (Prevention, Prohibition & Redressal) Act, 2013. This **Policy** is non-statutory with respect to persons other than women. However, we are committed to provide a safe environment for every individual irrespective of their gender and sexual orientation and persons who do not fit in binary categories of woman and men (intersex) and will provide the same due process to all employees who experience sexual harassment at workplace.

It is the responsibility of all those connected with the **Company** to comply with this **Policy**.

1.1 Objectives

a) Provide a work environment free from fear, reprisal, coercion, discrimination and harassment of sexual nature.
b) Express zero tolerance for any sexual harassment at workplace through Prevention, Resolution and Deterrence of acts of sexual harassment.
c) Enable all those working, associated with and visiting the **Company** to raise their concerns and make complaints without any fear.
d) Define sexual harassment and provide a clearly stated codified redressal for any sexual harassment occurring at the workplace.
e) Conduct fair investigation and reach reasonable decisions in a timely manner.
f) Provide procedure for resolution, settlement or prosecution of complaints of sexual harassment.

1.2 Scope

The **Policy** applies to all those employed and associated with the **Company**. They can be regular, temporary, ad hoc or daily wage basis employees. They include contract workers, consultants, retainers, probationers, trainees, and apprentices or called by any other such name, who are engaged by the Company. They could be appointed either directly or through an agent including a contractor, wherein it could be with or without knowledge of the **Company**. The terms of employment could be expressed or implied. This **Policy** also applies to all vendors, contractors, customers, agents, distributors of alternate channels and suppliers who do business with the **Company** and*/* or visit the employees of the **Company**.

This Policy will be incorporated in the service conditions of all employees of the Company in India (including employees working from GIFT City, Gandhinagar, Gujarat, India (IFSC Branch) of its foreign subsidiary), explicitly or by inferences and will come into effect immediately. All parties

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connected with the **Company** are mandated to follow this **Policy** and work collaboratively to prevent sexual harassment.

Federal law no. 3 of 1987, The Penal Code of the United Arab Emirates (UAE) will take precedence over this Policy especially in the matters of criminal proceedings, in the following associated entities based out in Dubai, UAE:

1) HDFC International Life and Re Company Limited (incorporated in DIFC, Dubai, UAE) – (*foreign wholly owned subsidiary of HDFC Life);*
2) HDFC Life Insurance Company Limited (Representative Office, Dubai, UAE) – *(representative office of HDFC Life)*

2. Definitions

a) **Aggrieved person:** Any person (employed, associated and visiting the **Company**) who complained of sexual harassment.

b) **Respondent:** Any person (employed, associated and visiting the **Company**) against whom aggrieved person has complained.

c) **Workplace:** For the purpose of this Policy shall have the definition as per the Act and shall in particular, include but not limited to - premises, locations, establishments, enterprises, institutions, offices, branches or units established, subsidiaries which are controlled by the Company, all instances reported within the **Company** and in any place visited by the employee during the course and out of employment including transportation provided by the Company or availed for company work, for undertaking such journeys. (Since all this is happening in the context of work, it is important to realise that it is not a geographical location, but any instance where the aggrieved is in contact/familiar with employee of the organisation due to the context of work, and the incident could happen even outside of work. Eg: Incident while meeting an employee even if not organised by the company)

d) **Sexual Harassment[1]:** Includes one or more of the following unwelcome acts or behaviour (whether directly or by implication) as below:

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[1]Sexual harassment can happen both in direct and / or indirect manner. It could be asking for something in exchange (Quid Pro Quo) and / or creating a difficult, intimidating and offensive work environment (Hostile Work Environment) that interferes with the work and performance at work. It could be either before and / or after incident of sexual harassment. The behaviour may be a single incident or continuous unwelcome behaviour. \

[2]Unwelcome denotes unwanted, undesirable and uninvited behaviour that makes a person feel uncomfortable. A behaviour or a gesture while may be acceptable to one person, need not be acceptable to or comfortable for another person. The intention of the person and/or motive behind the behaviour will not be taken into account when it comes to classifying/naming behaviour as sexual harassment. Sexual harassment cannot be justified and defended from this point of view. If the person was offended, humiliated or intimidated by the behaviour of the person or even felt so, it will fall within the purview of this **Policy**. It is important how the person perceives/understands /interprets the behaviour. Impact and effect of the sexual harassment on the person is important.

I. Physical contact or advances (eg. pushing, grabbing, jostling, touching the body and / or attempts to do so).
II. Demands or requests for sexual favours (eg. unwanted sexual attention, forcing to spend time together).

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III. Sexually coloured remarks (eg. verbal sexual innuendos such as jokes, suggestions, or hints about sexual behaviour, comments about physical appearance, offensive comments, abusive language).

IV. Showing pornography (eg. Display, giving or sending of pornography in the form of pictures, books, magazines, postcards, photos, animation, sound recording, film, video, and video games done personally and/ or via documents, or by telephone, cell-phone messages, web site communication, or emails).

V. Any other physical, verbal and non-verbal behaviour that is sexual in nature (eg. Non-verbal communication such as staring, gestures of sexual nature, following the person, stalking, persistent visiting, telephoning, sending of cell-phone messages, or other invasions of personal privacy, spreading rumours about sexuality, gender and / or character of a person or offensive comments on sexual orientation, physical appearance / attributes).

In addition to the above definition, if there are following circumstances along with or apart from, it shall amount to sexual harassment (creation of hostile work environment).

Hostile Work Environment[3] will include the following:

a) Direct and / or indirect promise of preferential (special) treatment in employment.

b) Direct and / or indirect threat of detrimental (harmful / damaging) treatment in employment.

c) Direct and /or indirect threat about present or future employment status or professional growth prospects.

d) Creation of conditions and situations that interfere with work or creation of an intimidating or offensive work environment.

e) Humiliating treatment likely to affect health and / or safety of the aggrieved person.

3. Complaint Mechanism

To prevent instances of sexual harassment and to receive and effectively deal with complaints pertaining to the same, **Internal Committees (IC)** have been appointed for all the four zones i.e. North (includes Central India), East, South, and West (includes Corporate & Mumbai Hub, Representative Office, Dubai, UAE and its foreign subsidiary - HDFC International Life and Re Company Limited (incorporated in DIFC, Dubai, UAE) across the country. There will be an Apex Committee (AC) at the head office over and above the ICs. The AC will supervise and monitor functioning of the zonal ICs. The detail of the committee is notified to all covered persons at the location (workplace).

Note: This article shall be read together with Article 3 below.

3.1 Composition of the Internal Committee (IC)

The Apex Committee (AC) and all ICs shall be presided by a woman employee at a senior level in the organisation or workplace and not less than half of its members shall be women.

Not less than two members from employees committed to the cause of women / having experience in social work / having legal knowledge shall be appointed with the AC and the ICs. Further, to ensure fairness and impartiality the AC and the ICs shall involve one member from non government organisation / associations committed to the cause of women / person familiar with issues relating to sexual harassment. The details of the IC and AC are available on the Company's official website.

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The committee will be responsible for:

a) Receiving complaints of sexual harassment at the workplace
b) Initiating and conducting inquiry as per the established procedure
c) Submitting findings and recommendations of inquiries
d) Coordinating with the employer in implementing appropriate action
e) Maintaining strict confidentiality throughout the process as per established guidelines
f) Submitting annual reports in the prescribed format

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2) The behaviour will be definitely held as unwelcome, if the person has made it clear that the behaviour is offensive and unwelcome. This will be pronounced where the person of the behaviour is junior and indicating that the behaviour is unwelcome to a senior would be difficult.

3) Examples: granting or denying recruitment, granting or denying promotion, threat of demotion, threat of termination or suspension, achieving or denying a privileged position such as a board member / special committee member, positive or negative performance appraisal result / career advancement, threats to spoil career, increased or decreased remuneration / bonus / allowances, issuing or denying any other form of benefit or enhancement such as travel overseas, or training, or conference attendance or such related activities.

3.2 Working of the IC

A quorum of 3 members is required to be present for the proceedings to take place. The quorum shall include the presiding officer of the IC, one member of the IC and the third party representative / NGO member.

4. Complaint Resolution

As an immediate step, the aggrieved person should attempt to indicate to the person indulging in the sexually offensive behaviour that the behaviour is unwelcomed, and specifically ask the respondent to stop the behaviour. Where the aggrieved person feels that they cannot ask the respondent to stop the offensive behaviour, or in spite of having done the same, behaviour continues, they may ask for the behaviour to be dealt with under the grievance procedure.

It is important that the aggrieved person keeps a written record of dates, times, details of the conduct and witnesses, if any. **Each complaint should at the minimum be specific with regards to following points:**

- Nature of sexual harassment
- Identity of the person/s who is/are involved in the act/s of sexual harassment
- Facts and circumstances in support of the complaint

The aggrieved person can inform and approach any member of the IC with a written complaint may file a written complaint of Sexual harassment at the workplace to the IC. The IC or the concerned HR/s of the Company, as the case may be, shall provide reasonable assistance to the Complainant to have the Complaint lodged. It shall equally be responsibility of all managers to notify a member or Presiding Officer of the IC about an incident of Sexual harassment that he/she witnesses or is brought to his/her notice by the Employee.

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In case the aggrieved person is not able to register complaint due to mental incapacity, the complaint can be registered with written consent from either of the aggrieved person either by -

a) her/his legal heir, or
b) her/his relative or friend, or
c) her/his coworker, or
d) an officer of the National Commission for Women or State Women's Commission or
e) any person who has knowledge of the incident.

In case the aggrieved person is not able to register complaint due to mental incapacity, the complaint can be registered with written consent from either by –

a) her/his legal heir, or
b) her/his relative or friend, or
c) a special educator, or
d) a qualified psychiatrist or psychologist, or
e) the guardian or authority under whose care the aggrieved person is receiving treatment or care, or
f) any person who has knowledge of the incident jointly with the aggrieved person's relative, friend, colleague, special educator, a qualified psychiatrist or psychologist, guardian or authority under whose care the aggrieved person is receiving treatment or care.

Where the aggrieved person is dead, complaint can be filed by any person who has knowledge of the incident with written consent of the legal heir of the aggrieved person.

When the Complaint is received, it will be promptly investigated in a fair and expeditious manner by the IC. In the event of a written complaint received by the IC, it shall look into the complaint within 10 working days of receipt of complaint. In case of the complaint was received by the **Management** and / or the Human Resources (HR) department / or any other person in the **Company**; it shall be immediately handed over to the IC. Irrespective of whether the aggrieved person opts to initiate criminal proceedings under the applicable laws, the IC shall be bound to initiate and conduct proceedings as laid out under this **Policy**. In case the complainant wants to register a police complaint against the respondent (Internal/External), organization would provide all the required support and assistance to the complainant. There are two important points to note:

- When the respondent is an external person (employee of our channel partners/brokers/distributors), the case would be referred to the IC of respondent's organization or to the concerned police station for further proceedings as well as associated actions would be taken up by them. The IC of HDFC Life would provide all the required support to take the complaint ahead.
- In case the respondent is a customer, agent, retainer, part time, off roll, contractual, project based employee or financial consultant, the IC of HDFC Life would conduct the proceedings.

The IC has the powers of the civil court, as per law and the decision of the IC would stand final.

4.1 Conciliation

The purpose of the IC is to resolve/redress the complaint of the aggrieved person. Hence, the first step by the IC will be to make an attempt to resolve the raised issue through mutual discussion between the aggrieved person and the respondent. The mutual discussion will be considered based on the gravity of misconduct as construed by the aggrieved person and their consent to the adopt conciliation process.

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On the request of the aggrieved person, within 30 working days after the 1st meeting, the IC after making sure that the aggrieved person is not opting for conciliation under any force / threat will take steps towards settling the matter between the aggrieved person and the respondent. This will be done through the process of separate and joint meetings. Conciliation will be completed within 50 days of initiation of the conciliation process. During the process of conciliation the IC will endeavour to resolve the matter and reach amicable resolution by means of meetings and discussions. No monetary settlement shall be made a basis of the conciliation.

The IC will record the terms of settlement acceptable to the aggrieved person and the respondent and file a closure report with the HR department to take further action as recorded in the settlement. Copies of the settlement shall be provided to the aggrieved person and the respondent. All persons involved in the conciliation will maintain the dignity and confidentiality of the persons involved. The aggrieved person will have the right to withdraw from the conciliation process by stating the reasons for withdrawal to the IC.(Withdrawal is not allowed after commencement of inquiry, as we are operating under law - respondent's credibility/image/ is at stake and they need to get an opportunity to prove their innocence)

Post the conciliation process, after the settlement is arrived, the IC will not do further enquiry on the complaint.

If the conciliation does not stop the behaviour and / or if any of the terms mentioned in the settlement are not complied with, the IC shall proceed to impose such disciplinary action as it deems fit.

4.2 Formal Complaint Resolution Procedure

The complaints committee shall make inquiry into the complaint in accordance with the principles of natural justice.

The IC shall hand over the written statement of charges to the person against whom complaint is made and give the respondent an opportunity to submit a written explanation within 7 working days of receipt of the same.

At the commencement of the inquiry the IC members shall explain to both the aggrieved person and the respondent the procedure which will be followed in the inquiry. The inquiry shall be conducted in line with the principles of natural justice.

The Internal Committee shall have the right to terminate the inquiry proceedings or to give an *ex-parte* decision on the complaint, if the complainant or respondent fails, without sufficient cause/time to present themselves for 3 (three) consecutive hearings convened by the IC. Such decision can be taken by the IC by giving notice of 15 days in advance. The IC will make every effort to complete the inquiry within a period of 90 (ninety) days of receipt of complaint by the IC.

The parties shall not be allowed to bring any legal practitioner to represent them in their case at any stage of the proceedings before the Complaints Committee.

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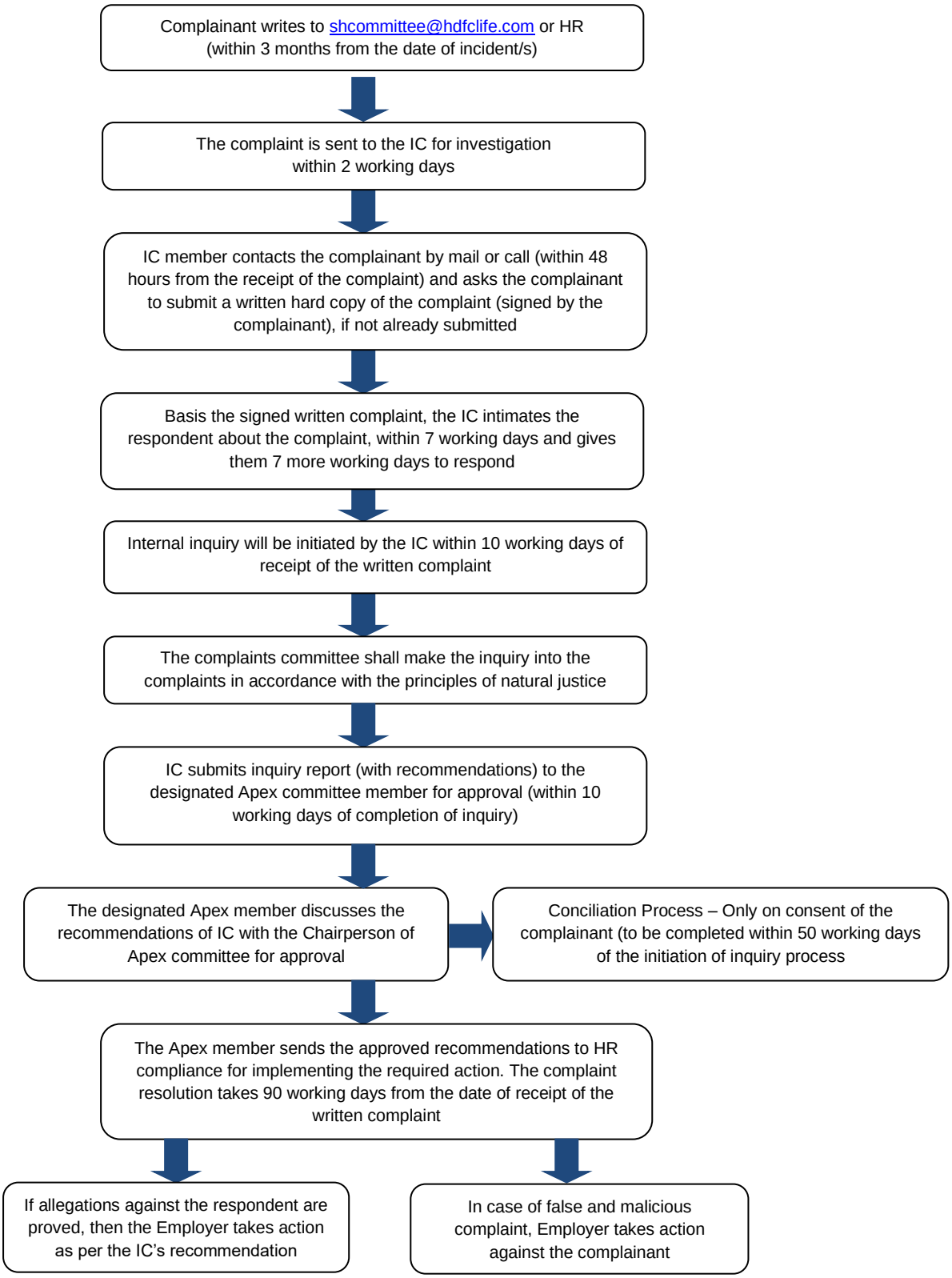
4.2.1 Steps of the complaint resolution process



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Determination of the penalties on the respondent shall be based on the followings:

a) Mental trauma, pain, suffering and emotional distress caused to the aggrieved person

b) Loss in career opportunity due to incident of sexual harassment

c) Medical expenses incurred by the aggrieved person for physical and psychiatric treatment

4.2.2 Interim Recommendations by the IC

During the course of the inquiry the IC for that period may recommend to the Management on its own and / or at the written request of the aggrieved person:

(i) Transfer either the aggrieved person or the respondent,
(ii) Suspension of the respondent/witness or any other party involved from work,
(iii) Grant leave to the aggrieved person (this leave would be in addition to the one is they are already entitled
(iv) Restrain the respondent from reporting on the work performance or confidential report of the aggrieved person and assign the same to another officer
(v) Restrain the transfer of the aggrieved person to any other place if she does not opt for such transfer
(vi) Issue a restraint order to warn the respondent that any attempt on his part, or by person(s) acting on his behalf, to contact or influence, or intimidate, or exert pressure on the complainant or witnesses may prove prejudicial to his case
(vii) Person charged with sexual harassment to be kept away from work/ or sent on transfer till the time such enquiry is completed to avoid tampering of documents, pressure on the witnesses and the aggrieved person.

4.2.3 Final recommendation by the IC

IC on charges proved against the respondent shall make following recommendations to the Management:

1. Initiate disciplinary action against the respondent in accordance with the **Policy**.
2. Deduction of any sum from salary or wages of the respondent as it may consider appropriate to be paid to the aggrieved person. In case deduction from salary / wages is not possible due to absence or cessation from employment, respondent can be directed to pay the amount directly to the aggrieved person.
3. The financial status of the respondent and the feasibility to pay in lump sum or instalments shall be taken into account.

4.3 Implementation of IC's recommendations

The **Management** shall act upon the final recommendations of the IC within a maximum 60 days of its receipt.

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In all situations, behaviour of respondent/s, witnesses and the complainant/s will be strictly monitored by the IC and / or by the HR department during and post enquiry phase and appropriate action can be recommended by the IC depending upon the severity of the misconduct / non-cooperation in the inquiry process.

The above disciplinary mechanism would be used judiciously to ensure fair and healthy working environment within the organisation and keep up the morale of the employees.

5. Disciplinary Action

The disciplinary action shall be recommended by the IC and will be imposed by the management based on severity of harassment and its impact on the aggrieved person. It could be either one or combined actions as given below:

a) Verbal Warning
b) Verbal Apology
c) Written Apology
d) Written Caution
e) Written Warning
f) Warning and taking a written bond of good conduct
g) Reprimand or censure
h) Debarring from supervisory duties
i) Withhold promotion till such period mentioned
j) Withholding or stoppage or delay of pay rise or increments of pay till such period mentioned
k) Termination from service
l) Undergo counselling session
m) Transfer to any other company/business location
n) Perform Community service
o) Compel the respondent to pay a reasonable amount of compensation to the complainant as per Section 13(3)(ii) of the Act. Deduction of a sum from salary / wages /adjust full and final settlement of the respondent as it may considered appropriate by the IC to be paid to the aggrieved person. In case deduction from salary / wages is not possible due to absence or cessation from employment, respondent can be directed to pay the amount to the aggrieved person.
p) Demotion
q) Dismissal with forfeiture of Gratuity, etc
r) IC can recommend support to take criminal action against the accused
s) Where an outsider is the perpetrator, in addition to assisting the aggrieved person to initiate action under the applicable laws, the **Management** shall also pass and implement necessary orders restricting the perpetrator's entry into the premises and forewarn them of criminal/legal action in case any trauma or threat is caused to the aggrieved person. When the respondent is a customer, agent, retainer, part time, off roll, contractual, project based employee or financial consultant of the organization, the IC can recommend any of one or a combination of more than one of the below mentioned alternatives:
    I. Assistance by the organization to the complainant to register a police complaint.
    II. The complainant would not deal with that customer, agent, retainer, part time, off roll, contractual, project based employee or financial consultant again in the future
    III. The company to end business relationship with the customer, agent, retainer, part time, off roll, contractual, project based employee or financial consultant

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t) Any other punishment that IC may deem appropriate at that time.

6. Appeals

In case any decision by the IC is not acceptable to the aggrieved person and / or respondent, they shall be given an opportunity to represent their case to the IC in-writing or in-person.

The decision arrived at thereafter by the IC shall be final and binding to both and shall be implemented by HR. They could further appeal to a court or tribunal as per the law within a period of 90 days.

7. False and Malicious Complaints

The **Company** is strongly opposed to misuse of this **Policy**. Therefore both aggrieved person and the respondent must be prepared to go through a fair process of inquiry by the Complaints Committee.

In case IC comes to a conclusion that complaint is found to be done and supported with malicious intent by the aggrieved person and witnesses respectively, done and supported knowing that it is false or if the aggrieved person and / or witnesses produced forged or misleading document/ s, the IC will recommend suitable action to the **Management** to prevent recurrence so that others are deterred from raising complaints in bad faith. The aggrieved person and / or witnesses will be liable for appropriate disciplinary action by the **Management**.

However mere inability to substantiate a complaint or provide adequate proof will not mean that the complaint is false. Malicious intent on the part of the complainant and witnesses shall be established after an enquiry by the **Management** as per the code of conduct of the **Company** before any action is recommended against them.

8. No Retaliation

There is zero tolerance to retaliation against the aggrieved person and all others who report such serious misconduct. Any act of retaliation should be reported to the **Management**. Appropriate steps will be taken to ensure that retaliation will not be done against any complainant or person who, in good faith, has participated in or provided information pertaining to incident/s of sexual harassment, regardless of whether the complaint was upheld. Individuals engaging in retaliatory conduct will be subject to disciplinary action by the **Management**.

9. Confidentiality

Publication, communication or information to public and media in any manner about contents of the complaint, identity and addresses of the aggrieved person, respondent and witnesses, information related to conciliation or enquiry proceedings, recommendations by the IC, and action taken by the employer shall not be done and shall
be treated as confidential. Information may be disseminated regarding justice to aggrieved persons under this **Policy** without disclosing name, address, identity, or any other particulars leading to identification of the persons involved.

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The company shall take appropriate disciplinary actions on any person who violates the confidentiality obligation under this policy.

10. Legal Compliance

The IC shall in each calendar year prepare, is such format as may be prescribed, an Annual Report and submit the same to the District Officer (as defined in the Act). The report shall have the following details:

a) number of complaints of Sexual harassment received in the year;
b) number of complaints disposed of during the year;
c) number of cases pending for more than 90 days;
d) number of workshops or awareness program against Sexual Harassment carried out;
e) nature of action taken by the employer or District Officer.

11. Conclusion

It shall be a constant effort of the **Company** to prevent sexual harassment and create conducive work environment. In case of any sexual harassment incident/s, the complainant should immediately raise a complaint and write an email to the shcommittee@hdfclife.com or the HR Personnel. The **Company** with its zero tolerance **Policy** is committed to the redressal of sexual harassment complaints. The **Company** strictly adheres to the implementation of the objectives of this **Policy**, and the procedures laid down herein, including the training and awareness of all employees. The sexual harassment **Policy** is subject to modifications periodically as per the changing times, needs of the organization and/or change in law.

11. Effective Date:

The latest version of this policy with the changes as per the revision history is effective from **06th July 2026** and supersedes all prior guidelines on the subject matter.

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